

Hygiene & Textile Toys.

Toys Safety Directive 2009/48/EC Annex II, Part V, Point 2

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Record of Amendments

Version	Date	Amendment	Section/page affected
1	24/08/15	Newly published	
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LEGAL NOTICE

This document contains guidance only.

It is intended to explain obligations and how to fulfil them. However readers are reminded that the text of the original regulation, directive or standard is the only authentic legal reference and that the information in this document does not constitute legal advice.

The British Toy and Hobby Association does not accept any liability with regard to the contents of this document.

1. Introduction

Article 18 of the new Toy Safety Directive 2009/48/EC introduces the concept of hygiene as part of a toys safety assessment:

Annex II gives particular safety requirements and part V is related to hygiene:

"Toys must be designed and manufactured in such a way as to meet hygiene and cleanliness requirements in order to avoid any risk of infection, sickness or contamination."

"A toy intended for use by children under 36 months must be designed and manufactured in such a way that it can be cleaned. A textile toy shall, to this end, be washable, except if it contains a mechanism that may be damaged if soak washed. The toy shall fulfill the safety requirements also after having been cleaned in accordance with this point and the manufacturer's instructions."

This document gives guidance on point 2 of Annex V.

2. Overview

The Directive specifies that a textile toy intended for children under 36 months must be washable (unless it contains a mechanism that may be damaged by soak washing) and still comply with the Essential Safety Requirements after washing.

It also details the washing approach as part of compliance testing and in the absence of any set standard (or manufacturers' instructions) provides parameters for wash testing.

3. Textile Toys for Children Under 36 Months

"Textile toys" are defined by the current Commission guidance document* as:

"Toys entirely made of textile with exception for materials inside the toy and minor features or decorations sewed/adhered to the outside (e.g. eyes and nose)."

"Mechanism" is defined by the current Commission guidance document* as:

"A component or multiple interconnected components that are designed to deliver at least one additional function to the textile toy such as light, sound, retention of form, movement...."

No test parameters for a soak wash are given. However the Commission guidance document states: *"Soak washing means immersing the toy in water or other liquid; this handling does not necessarily imply machine washing, it can be hand wash."*

The Directive also states that the toy must meet the safety requirements (article 18) after having been cleaned as required by the Directive and the manufacturer's instructions.

* http://ec.europa.eu/enterprise/sectors/toys/documents/guidance/index_en.htm

4. Textile Toys for Children Under 36 Months: Manufacturers Cleaning Instructions

EN71-1, section 5 contains an informative note which duplicates the text of Directive 2009/48/EC. In addition, it also states: “The manufacturer should, if applicable, provide instructions on how the toy has to be cleaned.”

It must be stressed however that the provision of cleaning instructions is neither a requirement of the Directive nor EN71-1 and so any cleaning instruction given is at the discretion of the manufacturer.

Nevertheless it is recommended that all textile toys intended for children under 36 months be accompanied by or labelled with cleaning instructions.

If cleaning instructions are provided the specified method must not jeopardise compliance to the essential safety requirements after application.

The specified cleaning instructions must also be effective in order to avoid any risk of infection, sickness or contamination.

If the manufacturer details a cleaning instruction which does not include immersion the toy must still meet the Essential Safety Requirements of the Directive after at least a soak wash (unless the toy contains a mechanism that would be damaged by a soak wash).

I.E. the Toy should still conform to EN71-1, EN71-2, EN71-3 etc., after at least a soak wash.

The following table illustrates how the Directive requirements apply to toys with differing cleaning instructions:

Examples of manufacturers cleaning instructions	The toy must meet the essential safety requirements of the Directive after performing:
No instruction	Soak wash (unless toy contains mechanism that would be damaged)
“Surface wash only”	
“Soak wash only” *	Soak wash
“Hand wash only” *	Soak wash
Machine wash *	Machine wash

(*Note: It is assumed that if the manufacturer provides these wash instructions then the toy has no mechanism that would be damaged by a soak wash)

There is no recognised international standard for a “soak wash”.