

UK INTERPRETATIONS GROUP

INTERPRETATION GROUP # 035	REQUEST FOR INTERPRETATION/METHODS	
Standards: EN 71-1 Edition: 2005+ A6 EN 71-3 Edition: 1994	Clause No. 3.25 Clause heading: Packaging	Date of Request: 6/1/09
	Clause No. 1 Clause heading: Scope	Source: Bureau Veritas CPS (UK) Ltd
Keywords: Packaging, play function		
Question: When is the packaging material in which a toy is sold subject to the requirements of EN 71-1 clauses 4 & 5, EN 71-2 clause 4.1, and EN 71-3 or when is it subject only to the requirements of EN 71-1 clause 6 ?		
Proposer's Comments for an answer : EN 71-1 clause 3.25 defines "packaging" as material accompanying the toy when purchased but having no intended play function. EN 71-3 clause 1 states that packaging materials are not included unless they form part of the toy or have intended play value. <u>Scenarios :</u> <ol style="list-style-type: none"> 1. Jig-saw puzzle supplied in a box which has the picture on the lid. Proposal : the box is clearly part of the toy and should be tested to EN 71-1 clauses 4 and 5, EN 71-2 clause 4.1 and EN 71-3. 2. A toy is supplied in a flimsy plastic bag which is very likely to be discarded as soon as the toy is removed from it. Proposal : the plastic bag is not to be tested to EN 71-1 clauses 4 and 5, EN 71-2 clause 4.1 or to EN 71-3. It is tested to EN 71-1 clause 6 only. 3. A toy is supplied in a robust plastic bag, often with press-studs, which is very likely to be retained for future storage of the product (but in itself has no intended play function). A pack of fibre-tip pens supplied in a plastic tray would be a further example (see image below). The plastic tray is very likely to be retained, at least for a limited period. Test or not test ? <u>Comments :</u> If the group takes the view that the packaging in scenario 3 is not tested because it has no intended play function, what are the consequences if the packaging, which is accessible to the child, releases small parts, or contains very high levels of lead or restricted phthalates, for example ?		
Interpretation Group Comments/Action:		
Status: Forward to BSI: Interpretation Methods Amendment No Further Action		
<p style="color: red;">Puzzle pictures on packaging were considered by the majority of the group as play value and would be tested as a toy.</p>		

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7.10.09 – It was agreed that the packaging must be used as an integral part of the play activity and not just at the start (to unpack) and end (to repack) the toy. To be discussed with Andy Welch (KL)

19.7.2010 After discussion with Equitoy this has been confirmed as a minor issue. Refer to EU Packaging Guidance no.12 published 25/5/2010 for further reference. Closed.



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<p>6 0988/09</p>	<p>United Kingdom</p>	<p>Category: Toys Product: Floor puzzle - Princess Hopscotch - Cinderella</p> <p>Brand: Disney Store Type/number of model: 411076602829</p> <p>Description: Pink floor puzzle mat for use as hopscotch game. Has picture of Cinderella on the cover, a certificate like paper which has the instructions in several languages. Packaging age graded 3+. Size: 30cm x 30cm x 10cm. Materials; puzzle mat made from EVA, bag made from clear plastic.</p> <p>Country of origin: China</p> 	<p>Chemical</p> <p>The product poses a chemical risk because the bag in which the puzzle is sold contains 30% by weight of bis (2-ethylhexyl) phthalate (DEHP) which is prohibited in toys according to the REACH regulation.</p>	<p>Voluntary withdrawal from the market.</p>
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