

Symbols on Toys in the UK and EEA

Brief guide

Record of Amendments			
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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.

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Background

Toys are subject to various regional and national legislation in the UK and EEA and are also marked with several symbols. This guide looks at those symbols pointing out what is commonly used, which are mandatory, and which are used on a voluntary basis.

This guide does not have an exhaustive list of symbols. It is reflective of current knowledge of common practice.

An annex on international markings is also included as the symbols are often found on toys in the EU market.

Markings

There are several symbols and markings that are required by law. Some are added on a voluntary basis or as an optional way to meet legal requirements.

The following is a summary of markings you might typically find on toys.

Toy safety regulations and standards

The Toy Safety Directive (2009/48/EC), the UK Toy Safety Regulations 2011 and associated standards, require a series of symbols.

Marking	Notes
 <p>CE Marking</p>	<p>The CE mark is required on packaging but may be placed on the product. It is commonly placed on both packaging and products to avoid issues with market surveillance</p>
 <p>UKCA Marking</p>	<p>The UKCA mark is required on packaging but may be placed on the product. Similar to CE marking, it will possibly be placed on both packaging and products to avoid issues with market surveillance</p>
 <p>Age warning symbol</p>	<p>Not all products require age warnings, but many do. The symbol is intended to be used as a replacement for the words “not suitable for children under the age of three”. The symbol does not replace the other elements of the warning such as the signal word (i.e. Warning) or the hazard notification (e.g. strangulation hazard).</p>

Packaging

European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste applies to all consumer product packaging and has requirements which effect product marking. There are national regulations and voluntary schemes that are widely used too

Marking	Notes
 <p data-bbox="320 680 467 712">Green point</p>	<p>Although not a requirement of the directive and a privately owned symbol, the “Green Dot” is commonly used to show that the brand owner or importer of the packaged product has paid a levy to the national compliance system to support recycling.</p> <p>Its use is in mandatory in Cyprus and Spain</p> <p>Its use is prohibited in France as a sign or marking that may cause confusion regarding the rule for sorting (see Triman below). This new requirement applies from 1st January 2021.</p> <p>Note licensee fees for Green Dot may be applicable in several countries.</p>
 <p data-bbox="320 943 467 1010">PET Material ID</p>	<p>Not mandated by the EU packaging regulation, it is best practice to identify materials in order to ensure efficient recycling. Some packaging may comprise several materials.</p> <p>Its use is mandatory in Italy. This new requirement applies from September 2020.</p> <p>Draft law makes it mandatory in Portugal as well.</p>
 <p data-bbox="347 1279 440 1310">Triman</p>	<p>The Triman symbol is a requirement in France. It applies to all household packaging aside from glass covered by an extended producer responsibility requirement, as well as paper commercial catalogues. The symbol should be accompanied with waste sorting instructions for consumers. The requirement, in force since 2015, allows for the symbol and instructions to be on a website rather than a product itself.</p> <p>There are proposals to amend the regulation to require the symbol to be on the product/packaging itself and to extend it to all materials that are subject to an EPR (including products).</p>
 <p data-bbox="212 1615 576 1646">On Pack Recycling Lable (OPRL)</p>	<p>The British Retail Consortium and the Waste and Resources Action Programme (WRAP), have developed “The On-Pack Recycling Label” scheme.</p> <p>These labels are a voluntary UK initiative, and are in widespread use in the grocery trade. 15% of Toy and Hobby companies now use the label.</p> <p>NOTE: BTHA members can obtain a discount on the regular administrative charge.</p>

The rise of national requirements for packaging markings has caused some concern. The requirements in France, now conflict with requirements in Spain and Cyprus. There are also requirements for sorting instructions in Italy (applying Summer 2021) and Portugal that are very similar to the requirements in France. The EU commission has been urged to get a grip on this trend before it presents a significant barrier to the functioning of the internal market.

Waste electrical regulation

Directive 2012/19/EU of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (WEEE) contains requirements for marking electrical products.

Directive 2006/66/EC of the European Parliament and of the Council of 6 September 2006 on batteries and accumulators and waste batteries and accumulators, also contains requirements for the marking of batteries.

Marking	Notes
  WEEE directive labelling	Indicates that products are not to be put in the domestic waste. Should be on the product but usually repeated on the packaging.
 Battery Directive labelling	Indicates that batteries are not to be put in the domestic waste. Should be on the battery but usually repeated on the packaging and must be on pack in the case of small batteries.

Single use plastics

The Single-Use Plastic Directive (EU) 2019/9042, includes a requirement that four groups of products are labelled to inform consumers the presence of plastic in the products, on inappropriate waste disposal means and the negative impact of littering. Not necessarily a requirement for toys but perhaps for products that are also produced by toy manufacturers

Marking	Notes
	The symbols are specified in Implementing Regulation (EU) 2020/21511. There are symbols for sanitary products, wet wipes, tobacco products and beverage cups (the symbol shown is for beverage cups made partly of plastic).

CLP hazard pictograms

The Classification, Labelling and Packaging (CLP) Regulation ((EC) No 1272/2008) is based on the United Nations' Globally Harmonised System (GHS) and gives rules for marking chemical substances and mixtures in the EU. Mixtures in toys are mostly not classified but in some cases meet the criteria for classification and so must show certain hazard phrases and pictograms. There are many possible pictograms but below are some that might appear on toys

Marking	Notes
 Exclamation mark	Used when mixtures may cause respiratory irritation, drowsiness or dizziness or an allergic skin reaction. Also used for eye and skin irritants and when a mixture is harmful if swallowed.
 Health hazard	Used with CMR and suspected CMR substances as well as with serious asthma and breathing irritants

Other markings

The following are other markings that might be required for a typical toy

Marking	Notes
 Lion Mark	The Lion Mark is a symbol used by BTHA members. It was developed in 1988 to perform a function not covered by the CE Mark, namely, to act as a recognisable consumer symbol denoting safety and quality.
 Age recommendation	Not a requirement but frequently voluntarily used as a mechanism for ensuring the product is suitable for the user. Often the age grade will be written out as well as included in a symbol. Image shown is an example, the information can come in any format
 Hand wash	Wash/care markings. A series of symbols used to communicate washing instructions. Often used on the label of soft filled and fabric toys. Image shown is an example, many symbols are available to communicate washing information.

Conclusions

There are an increasing number of symbols required on toys in the EEA. Increasing amounts of national legislation and voluntary schemes will make the tasks of compliance harder, especially when retailer demands, or market expectation make the markings a de facto mandatory requirement. Looking beyond the EEA there are even more marks to consider as shown in Annex 1.

Annex 1 – international markings

The following is a selection of symbols used in other markets around the world. THIS LIST IS NOT EXHAUSTIVE. The symbols are based upon current knowledge and information provided by members.

Marking	Notes
 <p data-bbox="316 622 472 654">GCC Marking</p>	<p data-bbox="608 495 1362 595">The GCC or Gulf Conformity mark is a requirement of technical regulations in Gulf Cooperation Council member countries. Its use is similar to that of the CE mark</p>
 <p data-bbox="336 853 451 884">EAC mark</p>	<p data-bbox="608 719 1299 819">The EAC or Eurasian Conformity mark is a requirement of technical regulations in Eurasian customs union member countries. Its use is similar to that of the CE mark</p>
 <p data-bbox="336 1077 451 1108">FCC mark</p>	<p data-bbox="608 909 1390 1077">The FCC logo or the FCC mark is a voluntary mark employed on electronic products including toys, on the US market. It indicates that the electromagnetic radiation from the device is below the limits specified by the Federal Communications Commission and the manufacturer has followed certain authorization procedures.</p>
 <p data-bbox="225 1301 568 1332">China compulsory certificate</p>	<p data-bbox="608 1167 1390 1267">The China Compulsory Certificate mark, commonly known as a CCC Mark, is a compulsory safety mark for many products on the Chinese market, including toys.</p>
 <p data-bbox="248 1525 539 1556">KC certification marking</p>	<p data-bbox="608 1379 1390 1514">The KC (Korea Certification) mark signifies compliance with Korea's product safety requirements for electrical and electronic equipment and is issued by Korea-based certification bodies that have been approved by the Korea Standards Association</p>

