

# SAFEGUARDS

SGS CONSUMER TESTING SERVICES

HARDLINES

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## NEW TOYS DIRECTIVE – SPOTLIGHT ON: AGE GRADING

On 18 June, 2009, New EU Toy Directive 2009/48/EC was published in Official Journal of the EU. The New Directive will come into force on the 21<sup>st</sup> of July 2011. There is an exception for chemical requirements that will come into force after the 20<sup>th</sup> of July 2013



Accurate age grading is essential for the safe use of toys. Children develop physical and mental abilities when growing older. The New Directive requires that the minimum and maximum ages of users are visible at the point of sale (on the packaging). Defining the appropriate

age is directly linked to specific age related toy requirements (e.g. specific warnings are required, prohibition of small parts for toys intended for use by children under 3 years). The New Directive acknowledges that children under 3 years are especially at risk because of their mouthing behaviour and their limited physical and mental maturation. Consequently, the Directive sets out particular *stringent provisions for toys intended for children under 3 years*. Therefore, it is important to know the correct age grading of toys so as to comply with applicable toy safety requirements. Please note that the New Directive age requirements are not limited to 3 years only, but are open to other age group limitations where needed.

There are 3 guidance documents that can assist in appropriate age grading:

### 1- CEN REPORT CR 14379: 2002 CLASSIFICATION OF TOYS - GUIDELINE

CEN/TC 52 Classification of Toys Guideline is a document that provides guidelines for matching toy characteristics to children's ages.

The guideline helps understanding the different stages of development of children:

For example, for children of 0 – 18 months: They become capable of "lifting their head and upper torso by themselves", "grabbing and manipulating toys" and "simple motory movements". For children of 18 – 36 months: Their muscular control increases and they improve on their ability to balance, their ability to speak and move affects ability to fantasize.

The SGS logo consists of the letters 'SGS' in a bold, sans-serif font. A vertical orange line is positioned to the right of the letters, and a horizontal orange line is positioned below the letters, forming an L-shape around the text.

Different kinds of toys have been divided into several categories (A – X) and users can refer to different functions and characteristics of toy to determine whether the toy is suitable for children under 36 months or not. Take a doll as an example, if a doll has a lot of accessories, articulated limbs and arms; then according to category H stated in the guideline, this doll is suitable for children older than 36 months.

The CEN guide can be purchased at standardisation body organisations like BSI, AFNOR, DIN etc.

As age grading may be complex the CEN guidelines may not provide sufficient information. In that case the more elaborate CPSC Age determination guidelines can be used.

## 2 - CPSC AGE GRADING DETERMINATION GUIDELINES

The CPSC Guidance document is available at: <http://www.cpsc.gov/businfo/adg.pdf>

The comprehensive CPSC Guidance document is an US document developed by the CPSC. It provides help on performing age determinations for toys.

The Guidance details children's abilities ranging from birth to 12 years of age. As development steps until 2 years of age are large, the details are given per 3 months. The older the children get, the larger the age intervals become.

The guidance identifies 21 toy subcategories and presents

information in both narrative and chart form.

An example is given below for dolls and stuffed toys ranging from birth through 3 months:

### DOLLS & STUFFED TOYS (general)

Dolls and stuffed toys can be appropriate for children of all ages. They often become a child's first sensory objects. Older infants and toddlers sometimes become attached to dolls and stuffed toys to feel a sense of security or to show affection. Such attachment may last through preschool and into the elementary years. As cognitive abilities increase, dolls, action figures, and stuffed toys, serve an important symbolic function in helping children learn to pretend and role-play. Older children collect their favorite dolls, action figures, or stuffed toys. One should place primary emphasis or importance on the following characteristics when determining the age appropriateness of dolls & stuffed toys:

- Level of Realism/Detail
- Cause & Effect
- Size of Parts
- Licensing
- Color/Contrast

### Birth Through 3 Months

Infants this age mostly enjoy sensing and feeling objects. They lack fine-motor control, so dolls and stuffed toys that are very lightweight (½ to 2 ounces) and have an easy-to-grip size—for example, with limbs ¼ inch thick and lengths of 4 to 8 inches—are appropriate. They are more appealing when they have a soft, felt-like texture like plush toys, have

highly contrasting colors (for example, black and white) or basic contrasting patterns and faces, or have rich vibrant colors. Because they are mouthing most objects, dolls and stuffed toys for these children are easily cleanable with no hair or fur, no removable clothing or accessories, and no projecting parts like eyes or snouts. Clothing and moving eyes are not particularly appealing to this age group, and stuffed animals have facial features that are sewn. Dolls and stuffed toys with very basic one-piece construction are appropriate, and should be sturdy enough not to break or pull apart.

### 3—EU GUIDANCE DOCUMENT NR 11 ON THE CLASSIFICATION OF TOYS INTENDED FOR CHILDREN UNDER 3 YEARS

The EU commission expert group on toys has published a guidance on the classification of toys intended for children under or above the age of 36 months. The approach focuses on 3 categories of toys: Jigsaw puzzles, dolls, soft and stuffed toys. The guidance document is available on the EU commission website: [http://ec.europa.eu/enterprise/sectors/toys/documents/guidance/index\\_en.htm](http://ec.europa.eu/enterprise/sectors/toys/documents/guidance/index_en.htm)



Below some examples are given regarding dolls and soft and stuffed toys.

### **Dolls**

Determining factors used to confirm the suitability of the products for children under 3 years old are:

- simple design;
- flexible, soft, smooth, cuddly products which resemble babies or little children;
- simple actions which make the doll move, cry or talk;
- with little or no interaction.



For dolls not intended for children under 3 years old, the category refers to dolls with which children do not identify themselves as “dad”, “mum”, “big brother”, “big sister”.

Examples include:

- traditional dolls which are completely rigid;
- fashion dolls.

### **Soft and Stuffed Toys**

Soft toys, by their nature, are cuddly toys due to their light, soft, spongy and smooth qualities. Very young infants have indeed a natural instinct to cuddle or be cuddled. They encourage basic playing, not requiring any special learning. In nearly all cases, soft toys should be suitable for children under 3 years old.

Examples of soft toys which should be considered as intended for children under 3 years old (provided the products are classified as toys):

- actual soft toys and musical soft toys;
- door decorations;
- height gauges for children’s bedrooms which, when filled, are the shape of a soft toy;
- purses;
- backpacks, particular reference is made to these two cases because of the risk of choking caused by the cords and straps;
- sleeping bags;
- animal-shaped cushion covers;
- animal-shaped hot-water-bottle covers.

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