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## JUVENILE PRODUCTS (1/2)

### INTERNATIONAL SAFETY STANDARDS & REGULATIONS SUMMARY

REQUIREMENT	USA	EUROPE	CANADA	AUSTRALIA	INTERNATIONAL	CHINA	BRAZIL
<b>TRANSPORT</b>							
Wheeled child conveyances/ carriages and strollers	• ASTM F833/16 CFR 1227	• EN 1888-1 and -2 • TS 17876 • EN 1888-3	• SOR 2023-101	• AS 2088/CPN No.8	• CPSA 001 (JN) • ISO 31110 • NOM 133/2-SCFI (MX)	• GB 14748, China Compulsory Certification (CCC) required	• NBR 14389 / Ordinance 167/2021
Rain covers	–	• NF S54-043	–	–	–	–	–
Baby carriers and slings	• ASTM F2236/16CFR1226 • ASTM F2549/16CFR1230 • ASTM F2907/16CFR1228	• EN 13209-1 • EN 13209-2 • TR 16512 • UNI 11736 (IT)	–	–	–	• GB T40227 Baby carrier with hipseat • GB T35270 • SN/T 5435-2022 (For soft carriers)	–
Child seats for cycles and bicycle trailers	• ASTM F1625	• EN 14344 • EN 15918	–	–	–	–	–
Child restraint systems (car seats), hand-held infant carriers	• 49 CFR 571.213 • ASTM F2050/16 CFR 1225	• I-SIZE UNR129 • EN 12790-1 • EN 12790-2	• SOR/2016-191	• AS/NZS 1754	–	• GB 27887, China Compulsory Certification (CCC) required	• ABNT NBR 14400/ FMVSS nº 213/ ECE nº R129 and Inmetro ordinance 246/2021
<b>SLEEPING</b>							
Cots and folding cots/non-full-size and full-size baby cribs	• ASTM F1169/16 CFR 1219 • ASTM F406/16 CFR 1220 • ASTM F2710	• EN 716-1 • EN 716-2	• SOR/2016-152	• AS/NZS 2172/CPN No. 6 • AS/NZS 2195/CPN No. 4	• ISO 7175-1 • ISO 7175-2	• GB 28007-2024 • GB/T 43000-2023	• NBR 15860-1 and 2/ Ordinance 143
Cribs and cradles/bassinets	• ASTM F2194/16 CFR 1218	• EN 1130	• SOR/2016-152	• AS/NZS 4385	–	• GB 30004 • QB/T 5659-2021	• Inmetro Ordinance 143/2021 • NBR 16067-1 and 2 • NBR 15860-1 and 2
Bedside sleepers	• ASTM F2906/16 CFR 1222	• EN 1130	• SOR/2016-152	–	–	• GB 28007-2024 • GB 30004	–
Infant sleep products	• 16 CFR 1236 • Inclined sleepers - Ban - 16 CFR 1310						
Junior beds/toddler beds/rest beds	• ASTM F1821/16 CFR 1217	• BS 8509 • NF D60-300-4 • NFS 54-045	–	–	–	• GB 28007-2024	–
Carrycots (and stands) and Moses baskets (bassinets)	• ASTM F2194/16 CFR 1218/ 16 CFR 1225	• EN 1466	• SOR/2016-152		–	–	–
Crib mattresses	• ASTM F2933/16 CFR 1241	• EN 16890 • BS 18700	–	• AS/NZS 8811.1	• ISO 23767	• GB 28007-2024 • QB/T 5590	• NBR 13579-1 and 2 • NBR 15413-1 and 2 • Ordinance 35/2021 and 75/2021
Children's sleep bags	• CPAI 75	• EN 16781	–	–	–	–	–
Cot bumpers	• 16 CFR 1309 – Ban	• EN 16780	–	–	–	–	–
Bunk beds	• ASTM F1427/16 CFR 1213/16 CFR 1513	• EN 747-1 • EN 747-2			• ISO 9098-1 and 2	• GB 28007-2024	
Duvets for children and duvet covers		• EN 16779-1 and -2					
<b>SITTING</b>							
High chairs	• ASTM F404/16 CFR 1231	• EN 14988	–	• AS/NZS 4684	• ISO 9221-1 • ISO 9221-2	• GB 28007-2024	• NBR 15991-1 and 2 • Ordinance 168/2021
Children's chairs and stools	• ASTM F2613/16 CFR 1232	• EN 17191	–	–	–	• GB 28007-2024	–
Portable hook-on chairs / table mounted chairs	• ASTM F1235/16 CFR 1233	• EN 1272	–	–	–	• GB 28007-2024	• NBR 15991-1 and 2 • Ordinance 168/2021
Infant floor seats	• ASTM F3317	–	–	–	–	• GB 28007-2024	–

Table 1

## JUVENILE PRODUCTS (2/2)

### INTERNATIONAL SAFETY STANDARDS & REGULATIONS SUMMARY

REQUIREMENT	USA	EUROPE	CANADA	AUSTRALIA	INTERNATIONAL	CHINA	BRAZIL
<b>SITTING (CONTINUED)</b>							
Booster seats	• ASTM F2640/16 CFR 1237	• EN 16120	–	–	–	–	–
Reclined cradles/infant bouncer seats/infant/toddler rockers	• ASTM F2167/16 CFR 1229 • ASTM F3084/16 CFR 1240	• EN12790-1 • EN12790-2	–	–	–	• GB/T 42804	–
Bean bag chairs	• ASTM F1912	• EN 17191					
<b>CLEANING</b>							
Changing units and changing pads Commercial changing units	• ASTM F2388/16 CFR 1235 • ASTM F2285	• EN 12221-1 and 2 • PrEN 12221 (draft)	–	–	–	–	–
Dressers, storage furniture units	• ASTM F2057/16 CFR 1261	• EN 14749	–	–	–	–	–
Bathing aids for babies, bath seats, bathtubs, infant bathtubs	• ASTM F1967/16 CFR 1215 • ASTM F2670/16 CFR 1234 • ASTM F3343	• EN 17022 • EN 17072	–	–	–	• GB/T 42802	–
Bath thermometers		• NF S54-042	–	–	–	–	–
<b>EARLY LEARNING</b>							
Baby walking frames/infant walkers	• ASTM F977/16 CFR 1216	• EN 1273	• CCPSA Schedule 2 Item 3: prohibited	–		• GB 14749, China Compulsory Certification (CCC) required	• Inmetro Ordinance 129/2021 • NBR 16311
Baby bouncers (EU)	–	• EN 14036	–	–	–	–	–
Baby swings	• ASTM F2088/16 CFR 1223	• EN 16232	–	–	–	• GB/T 42804	–
Stationary activity centers	• ASTM F2012/16 CFR 1238	–	–	–	–	–	–
Toy chests	• ASTM F963	–	–	–	–	–	–
Tables for children	–	• NF D60-300-1 • NF D60-300-3 • FIRA-FRQG, C001 & C003	–	–	–	• GB 28007	–
<b>PHYSICAL PROTECTION</b>							
Playpen/play yards/expandable enclosures	• ASTM F406/16 CFR 1221	• EN 12227	• SOR/2018-186	–	–	• GB 29281	–
Safety gates/expansion gates	• ASTM F1004/16 CFR 1239	• EN 1930	• SOR/2016-179	–	–	–	–
Bed guard/ portable bed rails	• ASTM F2085/16 CFR 1224	• BS 7972	–	–	–	• GB/T 5866	–
Harnesses and reins	–	• EN13210-1 • EN13210-2	–	–	–	• GB 23159 • GB/T 35448	–
Locking devices for windows and balcony doors		• EN 16281				• GB/T 42805	–
Child safety locks and latches, locking devices for cupboards and drawers	ASTM F3492	• EN 16948	–	–	–	• GB/T 42805	–
Finger protection devices for doors	–	• EN 16654	–	–	–	• GB/T 42805	–
<b>FEEDING &amp; ACCESSORIES</b>							
Soothers/pacifiers	• ASTM F963/16 CFR 1511	• EN 1400	• SOR/2016-184 • CCPSA Schedule 2 item 4: prohibited	• AS/NZS 2432	–	• GB 28482	• NBR 10334 • INMETRO Ordinance 301/2021 • INMETRO Ordinance 908/2024
Drinking equipment/baby bottles	–	• EN14350	–	–	–	• GB 38995 Infant feeding bottles and teats	• NBR 13793 • ANVISA RDC 51, RDC 52 and RDC 326 for plastics • ANVISA RDC 20/07 for metals • ANVISA RDC 27/96 for ceramic and glass parts • INMETRO Ordinance 216/2021 • INMETRO Ordinance 908/2024
Cutlery and feeding utensils	–	• EN 14372	–	–	–	• GB/T 42806	• ANVISA RDC 51, RDC 52 and RDC 326 for plastics • ANVISA RDC 854/24 for metals • ANVISA RDC 27/96 for ceramic and glass parts
Soothe holders	–	• EN 12586	–	–	–	–	• NBR 15260
<b>GENERAL</b>	–	CEN/TR 13387	–	–	–	–	–

Table 1

## JUVENILE PRODUCTS (1/2)

### INTERNATIONAL CHEMICAL REQUIREMENTS

The success of a business depends on having quality products. Products for children, including juvenile products, are among the most highly regulated consumer products in today's marketplace. The need to manufacture juvenile products that meet modern-day global regulatory and industrial standards is undoubtedly competitive and of paramount importance.

The use of chemical substances plays an important role in determining the unique features and distinct characteristics in the manufacture of juvenile products. Children are especially vulnerable, so parents and care givers always want to be confident that the chemical substances in juvenile products that they purchase conform to destination-market requirements.

#### EUROPEAN UNION

Juvenile products destined for the European Union (EU) are obliged to comply with EU and specific member state legislation. The most prominent of these are:

- I. Directive 2006/66/EC / Regulation (EU) 2023/1542 (Batteries)
- II. Regulations (EC) 1935/2004 (Food Contact Materials and Articles), (EU) 10/2011 (Plastics) and (EU) 2018/213 (BPA in Coatings and Varnishes)
- III. Directive 2001/95/EC / Regulation (EU) 2023/988 (General Product Safety)
- IV. Regulation (EU) 2019/1021 (Persistent Organic Pollutants, POP Recast)
- V. Quality EN standards for specific juvenile products (Table 2)
- VI. Regulation (EC) 1907/2006 (Registration, Evaluation, Authorisation and Restriction of Chemicals, REACH)
  - a. Annex XVII of REACH (Restricted Chemicals)
  - b. Substances of Very High Concern (SVHCs) on Candidate List – also for Directive 2008/98/EC (Waste Framework Directive, WFD)
- VII. Directive 2011/65/EU (RoHS Recast)

Representative chemical requirements and standards for juvenile products destined for the EU are in Tables 2 and 3.

EUROPEAN STANDARDS (REPRESENTATIVE EXAMPLES)		
ITEM	STANDARD	STANDARD NAME
1	EN 12586	Child use and care articles. Soother holders. Safety requirements and test methods
2	EN 1400	Child use and care articles. Soothers for babies and young children. Safety requirements and test methods
3	EN 14350	Child care articles. Drinking equipment. Safety requirements and test methods
4	EN 14372	Child use and care articles. Cutlery and feeding utensils. Safety requirements and tests
5	CEN/TR 13387-2	Child care articles. General safety guidelines – Chemical hazards
6	PrEN 17826 (draft)	Child care articles. Chemical hazards. Requirements

Table 2

EUROPEAN UNION AND MEMBER STATE REQUIREMENTS (REPRESENTATIVE EXAMPLES)			
ITEM	CITATION	SUBSTANCE	SCOPE
1	Regulation (EU) 2019/1021 (POP Recast)	Polybrominated diphenyl ethers: Tetra-, penta-, hexa-, hepta-, and deca-BDE	Consumer products
2	Regulation (EU) 2019/1021 (POP Recast)	Perfluorosulfonic acid (PFOS) and its derivatives	Consumer products
3	Regulation (EU) 2019/1021 (POP Recast)	Hexabromocyclododecane (HBCDD)	Consumer products
4	Regulation (EU) 2019/1021 (POP Recast)	Pentachlorophenol (PCP), its salts and esters	Consumer products
5	Regulation (EU) 2019/1021 (POP Recast)	Short-chain chlorinated paraffins (SCCPs)	Consumer products
6	Regulation (EU) 2019/1021 (POP Recast)	Perfluorooctanoic acid (PFOA), its salts and PFOA-related substances	Consumer products
7	<ul style="list-style-type: none"> <li>REACH</li> <li>Directive 2009/98/EC (Waste Framework Directive, WFD)</li> </ul>	Substances of very high concern (SVHCs) on Candidate List	<ul style="list-style-type: none"> <li>Consumer products</li> <li>Articles (WFD)</li> </ul>
8	REACH Annex XVII (Entry 20)	Organotins: <ul style="list-style-type: none"> <li>Tri-substituted-organotins</li> <li>Dibutyltins (DBT)</li> <li>Diocetylins (DOT)</li> </ul>	<ul style="list-style-type: none"> <li>Articles (Tri-substituted)</li> <li>Mixtures and articles (DBT)</li> <li>Certain articles (DOT)</li> </ul>
9	REACH Annex XVII (Entry 23)	Cadmium	<ul style="list-style-type: none"> <li>Certain plastics</li> <li>Paint on painted articles</li> <li>Metal jewelry</li> </ul>
10	REACH Annex XVII (Entry 43)	Azo dyes	Textile and leather articles which may come into direct and prolonged contact with human skin or oral cavity
11	REACH Annex XVII (Entry 47)	Chromium (VI) compounds	Articles containing leather parts coming into contact with skin
12	REACH Annex XVII (Entry 50)	Polycyclic aromatic hydrocarbons (PAHs)	Rubber or plastic components in articles for the general public if these come into direct and prolonged or short-term repetitive contact with the human skin or the oral cavity under normal or reasonably foreseeable conditions of use
13	REACH Annex XVII (Entry 51)	BBP, DBP, DEHP and DIBP	<ul style="list-style-type: none"> <li>Toys and childcare articles</li> <li>Articles</li> </ul>
14	REACH Annex XVII (Entry 52)	DIDP, DINP and DNOP	Toys and childcare articles which can be placed in the mouth by children
15	REACH Annex XVII (Entry 61)	Dimethyl fumarate (DMFu)	Articles
16	REACH Annex XVII (Entry 63)	Lead	<ul style="list-style-type: none"> <li>Jewelry</li> <li>Articles for the general public or accessible parts thereof which may be placed in the mouth by children</li> </ul>
17	REACH Annex XVII (Entry 68)	C <sub>9</sub> -C <sub>14</sub> Perfluorocarboxylic acids, (PFCAs), their salts and C <sub>9</sub> -C <sub>14</sub> PFCA-related substances	Mixtures and articles
18	REACH Annex XVII (Entry 72)	Appendix 12 – CMR category 1A or 1B substances	<ul style="list-style-type: none"> <li>Clothing and related accessories</li> <li>Textiles other than clothing which, under normal or reasonably foreseeable condition of use, come into contact with the human skin to an extent similar to clothing</li> <li>Footwear</li> </ul>
19	REACH Annex XVII (Entry 77)	Formaldehyde and formaldehyde-releasing substances	Articles, including furniture and wood-based articles
20	Austrian National Gazette II 327/2011	Bisphenol A (BPA)	Soothers and teethers
21	Danish Order No. 947 of 20 June, 2020	Phthalates	Toys and childcare articles for children aged 0-3 years
22	French Act 2010-729 of 24 December, 2012	BPA	Baby bottles
23	French Act 2012-1442 of 24 December, 2012	BPA	<ul style="list-style-type: none"> <li>Food contact materials and articles</li> <li>Soothers and teethers</li> </ul>
24	German Committee on Product Safety (AfPS GS 2019.01 PAK, April 2020)	Polycyclic aromatic hydrocarbons (PAHs)	Articles

Table 3

## JUVENILE PRODUCTS (2/2)

### INTERNATIONAL CHEMICAL REQUIREMENTS

#### USA

Juvenile products destined for the US are required to meet applicable federal, state, city and local government laws. Under the Consumer Product Safety Improvement Act of 2008 (CPSIA), juvenile products are obligated to comply with each of the following applicable safety rules:

- Phthalates (toys and childcare articles)
- Total lead content
  - Accessible substrates
  - Paint and similar surface coating materials
- Consumer Product Safety Commission (CPSC, durable infant and nursery products)
- CPSC-accepted third-party testing and component part testing
- Federal Hazardous Substances Act (FHSA)
- Manufacturer or importer to issue a Children's Product Certificate (CPC) based on point IV above
- Product registration card (durable infant and nursery products)
- Periodic testing to ensure ongoing compliance
- Tracking label permanently affixed to product and its packaging, if practicable

Representative examples of chemical requirements for juvenile products destined for the US are in Table 4.

#### OTHER INTERNATIONAL LEGISLATION AND STANDARDS (REPRESENTATIVE EXAMPLES)

- Australian Competition and Consumer Commission (ACCC)
- Australian Industrial Chemicals Environment Management (Register) Instrument 2022 (InChEMS Register)
- Canada Consumer Product Safety Act (CCPSA)
  - Consumer products containing lead regulations (SOR/2018-83)
  - Infant feeding bottle nipples regulations (SOR/2016-180)
  - Pacifiers regulations (SOR/2016-184)
  - Phthalates regulations (SOR/2016-188)
  - Heavy metals - section 23 of the toys regulations (SOR/2011-17)
  - Regulations amending Schedule 2 to the CCPSA (TCEP) (SOR/2014-79)
  - Surface coating materials regulations (SOR/2016-193 amended by SOR/2022-122)
  - Formaldehyde emissions from composite wood regulations (SOR/2021-148)
- China GB standards e.g.
  - GB/T 39498 Guidelines for the use and control of key chemical substances in consumer products
- Korea Quality Management and Safety Control of Industrial Products Act
  - Childcare articles (formaldehyde)
  - Children's products (lead, cadmium, nickel release, phthalates)
- Swiss Chemical Risk Reduction Ordinance (ORRChem)

US FEDERAL, STATE AND COUNTY LEGISLATION (REPRESENTATIVE EXAMPLES)			
ITEM	CITATION	SUBSTANCE	SCOPE
1	Federal <ul style="list-style-type: none"> <li>US Public Law 110 - 314, (Consumer Product Safety Improvement Act of 2008 (CPSIA))</li> </ul>	Lead content	<ul style="list-style-type: none"> <li>Paint on children's products</li> <li>Substrates (children's products)</li> </ul>
2	Federal <ul style="list-style-type: none"> <li>16 CFR 1307 'Prohibition of Children's Toys and Child Care Articles Containing Specified Phthalates'</li> </ul>	Phthalates <sup>1</sup>	Toys and childcare articles
3	Federal <ul style="list-style-type: none"> <li>Toxic Substances Control Act Title VI (TSCA Title VI - Formaldehyde Standards for Composite Wood Products)</li> </ul>	Formaldehyde emission	Products containing HWPW-CC, HWPW-VC, PB, MDF and thin MDF
4	State and City laws <ul style="list-style-type: none"> <li>Anchorage (Alaska), California, Hawaii, Illinois, Maine, Maryland, Massachusetts, Michigan, Nevada, Minnesota, New Hampshire, New York, Oregon, Rhode Island, San Francisco, Vermont, Washington and Washington DC</li> </ul>	Flame retardants	Scope of products, flame retardants and requirements are specific to each jurisdiction
5	State, City and County laws <ul style="list-style-type: none"> <li>California, Chicago, Connecticut, Delaware, Illinois, Maine, Maryland, Massachusetts, Minnesota, Multnomah County (Oregon), Nevada, New York, Vermont, Washington, Washington DC and Wisconsin</li> </ul>	Bisphenol A (BPA)	Scope of products and requirements is jurisdiction dependent
6	State laws <ul style="list-style-type: none"> <li>California, Colorado, Connecticut, Maine, Minnesota, New Hampshire and Vermont</li> </ul>	PFAS	<ul style="list-style-type: none"> <li>Children's products (Connecticut)</li> <li>Juvenile products</li> </ul>
7	California Airborne Toxic Control Measure (ATCM) for Formaldehyde Emissions from Composite Wood	Formaldehyde emission	Products containing HWPW-CC, HWPW-VC, PB, MDF and thin-MDF <sup>2</sup>
8	California Health and Safety Code - Division 104. Environmental Health, Part 3. Product Safety, Chapter 11. Phthalates in Products for Young Children	Phthalates <sup>4</sup>	Toys and childcare articles
9	California Proposition 65 (Prop 65)	Prop 65 chemicals	Products, including packaging materials
10	Maine <ul style="list-style-type: none"> <li>Title 38, Chapter 16-D, Toxic Chemicals in Children's Products</li> </ul>	Priority chemicals	<ul style="list-style-type: none"> <li>Scope of children's products<sup>3</sup> are dependent on priority chemical</li> </ul>
11	Oregon <ul style="list-style-type: none"> <li>Chapter 431, Public Health Programs and Activities: 'Toxic Free Kids Act'</li> </ul>	High-priority chemicals of concern for children's health (HPCCCHs)	<ul style="list-style-type: none"> <li>Children's products</li> </ul>
12	New York <ul style="list-style-type: none"> <li>Environmental Conservation Law Article 37 Title 9 'Toxic Chemicals in Children's Products'</li> </ul>	<ul style="list-style-type: none"> <li>Chemicals of Concern</li> <li>High Priority Chemicals</li> </ul>	<ul style="list-style-type: none"> <li>Children's products</li> </ul>
13	New York Suffolk County <ul style="list-style-type: none"> <li>Chapter 704: Retail Sales; Article VI: Children's Products Containing Cadmium § 704 - 40 to § 704 - 47</li> </ul>	Cadmium	<ul style="list-style-type: none"> <li>Children's products</li> </ul>
14	Vermont <ul style="list-style-type: none"> <li>18 V.S.A Chapter 38A 'Chemicals of High Concern to Children'</li> </ul>	Chemicals of high concern to children (CHCCs)	<ul style="list-style-type: none"> <li>Children's products</li> </ul>
15	Washington <ul style="list-style-type: none"> <li>RCW Chapter 70.240 'Children's Safe Products Act'</li> </ul>	<ul style="list-style-type: none"> <li>Chemicals of high concern to children (CHCCs)</li> <li>Lead, cadmium<sup>4</sup> and phthalates</li> </ul>	<ul style="list-style-type: none"> <li>Children's products</li> </ul>
16	Illinois Lead Poisoning Prevention Act (LPPA)	Lead content	<ul style="list-style-type: none"> <li>Toys containing paint</li> <li>Childcare articles</li> </ul>

Table 4

(1) Phthalates (BBP, DBP, DEHP, DCHP, DHEXP (DnHP), DIBP, DINP and DPENP)

(2) Hardwood plywood composite core (HWPW-CC), hardwood plywood veneer Core (HWPW-VC), particleboard (PB), medium density fiberboard (MDF)

(3) Children's product' means a consumer product intended for, made for or marketed for use by children under 12 years of age, such as baby products, car seats, clothing, personal care products and toys, and any consumer product containing a chemical of high concern that when used or disposed of will likely to result in a child under 12 years of age or a fetus being exposed to that chemical

(4) Phthalates (BBP, DBP, DEHP, DIDP, DINP and DNOP)

## APPLICABLE REQUIREMENTS ON CERTAIN ELEMENTS (HEAVY METALS)

	USA		EUROPE						CANADA	AUSTRALIA
STANDARD	CPSC (CPSIA)	ASTM F963	Juvenile product standards referencing to the latest version of EN 71-3 <sup>1</sup>	Juvenile product standards referencing to 8 elements under EN 71-3 <sup>2</sup>	EN 1400:2013+A2: 2018 Soothers	EN 12586 Soother holders	EN 14372 (Cutlery and feeding utensils)	EN 14350	CCPSA Toys Regulations (SOR/2011-17)	AS/NZS ISO 8124 Part 3
LEAD IN SUBSTRATES	100 T	–	–	–	–	–	–	–	90 T <sup>3</sup>	–
MATERIAL	Coatings	Toy materials other than modelling clay	Scraped-off toy materials (Category III) <sup>4</sup>	Toy materials other than modelling clay <sup>2</sup>	All materials (see standard)	All materials (see standard)	All materials for EN 14372 (see standard)	All materials	Stickers, films or other similar materials that can be removed, or surface coating materials	Toy materials other than modelling clay and finger paints
REQUIREMENT	mg/kg (ppm)	mg/kg (ppm)	mg/kg (ppm)	mg/kg (ppm)	mg/kg (ppm)	mg/kg (ppm)	mg/kg (ppm)	mg/kg (ppm)	mg/kg (ppm)	mg/kg (ppm)
Antimony (Sb)	–	60	560	60	60	60	15	120	1,000	60
Arsenic (As)	–	25	47	25	5.0	25	10	10	1,000	25
Barium (Ba)	–	1,000	18,750	1,000	2,000	1,000	100	4,000	1,000	1,000
Cadmium (Cd)	–	75	17	75	1.8	75	20	3.6	1,000	75
Chromium (Cr)	–	60	–	60	–	60	10	–	–	60
Chromium (III)	–	–	460	–	50	–	–	100	–	–
Chromium (VI)	–	–	0.053	–	0.001*	–	–	0.002*	–	–
Lead (Pb)	90 T	90 T/90	23	90	2.5	90	25	5.0	90 T	90
Mercury (Hg)	–	60	94	60	10	60	10	20	10 T	60
Selenium (Se)	–	500	460	500	50	500	100	100	1,000	500
Aluminum (Al)	–	–	28,130	–	1,430	–	–	6,000	–	–
Boron (B)	–	–	15,000	–	1,600	–	–	3,200	–	–
Cobalt (Co)	–	–	130	–	14	–	–	28	–	–
Copper (Cu)	–	–	7,700	–	830	–	–	1,660	–	–
Manganese (Mn)	–	–	15,000	–	300	–	–	600	–	–
Nickel (Ni)	–	–	930	–	28	–	–	56	–	–
Strontium (Sr)	–	–	56,000	–	6,000	–	–	12,000	–	–
Tin (Sn)	–	–	180,000	–	20,000	–	–	40,000	–	–
Organic tin	–	–	12	–	1.3	–	–	2.5	–	–
Zinc (Zn)	–	–	46,000	–	5,000	–	–	10,000	–	–

Table 5

Unless indicated with T (total content), all requirements are soluble content

\* Sample is considered 'Passed' if the Cr (VI) level measured is below the Limit of Quantification (LOQ) of the valid version of EN 71-3

<sup>1</sup>Fully applicable to cots and folding cots, carrycots, cribs and cradles, mattresses for cots and cribs

<sup>2</sup>Still applicable to soother holders, playpens, changing units, safety barriers, baby carriers, baby walkers, reclined cradles, harness and resins, bouncer seats

<sup>3</sup>Canada Consumer Product Safety Act (CCPSA), Consumer Products Containing Lead Regulation (CPCLR, SOR/2018-83) - products that are brought into contact with the user's mouth during normal use, products for use in learning or play by children under 14 years of age, clothing or clothing accessories for children under

14 years of age, books or similar printed products for children under 14 years of age and childcare articles that are designed and intended to facilitate sleep, hygiene, carrying or transportation of a child under 4 years of age

<sup>4</sup>Category III toy materials: solid toy materials with or without a coating which can be ingested as a result of biting, tooth scraping, sucking or licking (e.g. ceramics, glass, metals and alloys, polymers, surface coatings, textiles, wood and other materials such as bone, leather, natural sponge and paper/card)



DRAFT PREN 17826 – CHILD CARE  
ARTICLES – CHEMICAL HAZARDS

The prEN 17826 standard is under approval by the European Committee for Standardization (Comité Européen de Normalisation, CEN) at the time of publication of this article.

This standard specifies chemical requirements and reference test methods for several child care articles within the scope of CEN/TC 252. Excluded from the scope are soothers (EN 1400), soother holders (EN 12586), drinking equipment (EN 14359) and cutlery and feeding utensils (EN 14372) as these requirements are already given in their respective standards.

The scope of products and their chemical requirements in the draft standard are summarized in Table 6.

SECTION TO DRAFT prEN 17826	HIGHLIGHTS
Scope	<ul style="list-style-type: none"><li>• Baby bouncers</li><li>• Baby walking frames</li><li>• Baby carriers and child carriers</li><li>• Bath tubs and bathing aids</li><li>• Bed guards</li><li>• Carry cots, baby nests and carry cot stands</li><li>• Chair mounted seats</li><li>• Changing units</li><li>• Children's harness and reins</li><li>• Child's seat for bicycles</li><li>• Pushchairs and prams</li><li>• Reclined cradles and infant swings</li><li>• Safety barriers</li><li>• Table mounted seats</li></ul>
Migration of certain elements	<ul style="list-style-type: none"><li>• Restricts the migration of 19 elements with limits from EN 71-3:2019+A1:2021 category III toy materials</li></ul>
Flame retardants	<ul style="list-style-type: none"><li>• ≤ 5 mg/kg for each of TCEP, TCPP, TDCP in plastic, foam, textile and wood materials</li></ul> <p>TCEP = tris(2-chloroethyl) phosphate TCPP = tris (2-chloro-1-methylethyl) phosphate TDCP = tris[2-chloro-1-(chloromethyl)ethyl] phosphate</p>
Aniline	<ul style="list-style-type: none"><li>• ≤ 30 mg/kg after reductive cleavage for textile and leather materials</li></ul>
Allergenic fragrances	<ul style="list-style-type: none"><li>• Prohibits 58 allergenic fragrances (Table 3), otherwise ≤ 100 mg/kg for each fragrance if it is technically unavoidable under good manufacturing practice (GMP)</li><li>• Additionally, the names of 72 allergenic fragrances (Table 4) must be listed on the article, on an affixed label, on the packaging or in an accompany leaflet if these are intentionally added and exceed 100 mg/kg</li><li>• In addition, intentionally scented products must be labelled with the phrase 'contains fragrance'</li></ul>
Formaldehyde	<ul style="list-style-type: none"><li>• ≤ 30 mg/kg for free and hydrolyzed formaldehyde in textile and leather materials</li></ul>
Formamide	<ul style="list-style-type: none"><li>• ≤ 200 mg/kg in ethylene-vinyl acetate (EVA) based foam materials with a surface greater than 0.45 m² in child care articles for indoor use, otherwise ≤ 20 µg/m³ after a maximum of 28 days</li></ul>

SECTION TO DRAFT prEN 17826	HIGHLIGHTS	
Polycyclic aromatic hydrocarbons (PAH)	PAH	Requirement (natural and synthetic rubber materials)
	Benzo[ghi]perylene	< 0.2 mg/kg
	Indeno[1,2,3-cd]pyrene	< 0.2 mg/kg
	Naphthalene	< 1 mg/kg
	Anthracene	< 1 mg/kg (sum)
	Fluoranthene	
	Phenanthrene	
	Pyrene	< 1 mg/kg (sum)
	Sum of PAH	

Table 6



NEWS - In February 2024, SGS has gained GS-Mark lab approval from the German Central Authority of the Federal States for Safety (Zentralstelle der Länder für Sicherheitstechnik - ZLS) for juvenile product testing at its state-of-the-art facilities in Aix en Provence.



## SUMMARY OF INTERNATIONAL TOY SAFETY REQUIREMENTS

REQUIREMENTS	USA	EUROPE	CANADA	AUSTRALIA	INTERNATIONAL	JAPAN	CHINA	BRAZIL*
Mechanical & physical test	CPSC & ASTM F963	EN 71 Part 1	Canada Consumer Product Safety Act (CCPSA), Toys Regulations (SOR/2011-17)	AS/NZS ISO 8124 Part 1	ISO 8124 Part 1	ST Part 1	<ul style="list-style-type: none"> <li>GB 6675.2</li> <li>GB 5296.5 (labelling)</li> </ul>	NM 300 - 1
Flammability test (Textile material/pile fabric/pile materials)	<ul style="list-style-type: none"> <li>16 CFR Part 1610</li> <li>ASTM F963 Annex 6</li> </ul>	EN 71 Part 2	Canada Consumer Product Safety Act (CCPSA), Toys Regulations (SOR/2011-17)	AS/NZS ISO 8124 Part 2	ISO 8124 Part 2	ST Part 2	GB 6675.3	NM 300 - 2
Flammability test (Solid material/toy products)	<ul style="list-style-type: none"> <li>16 CFR Part 1500.44</li> <li>ASTM F963 Annex 5</li> </ul>	EN 71 Part 2	Canada Consumer Product Safety Act (CCPSA), Toys Regulations (SOR/2011-17)	AS/NZS ISO 8124 Part 2	ISO 8124 Part 2	ST Part 2	GB 6675.3	NM 300 - 2
Toxic element test (Heavy metal analysis)	<ul style="list-style-type: none"> <li>16 CFR Part 1303 Lead in paint</li> <li>ASTM F963 § 4.3.5</li> <li>Soluble Heavy Metals (incl. A11.10)</li> <li>CPSIA</li> </ul>	EN 71 Part 3	Canada Consumer Product Safety Act (CCPSA), Toys Regulations (SOR/2011-17, amended by SOR/2022-122)	AS/NZS ISO 8124 Part 3	ISO 8124 Part 3	ST Part 3	<ul style="list-style-type: none"> <li>GB 6675.1</li> <li>GB 6675.4</li> <li>GB 24613 (coatings on toy)</li> </ul>	NM 300 - 3
Cleanliness of stuffing material	<ul style="list-style-type: none"> <li>ASTM F963</li> <li>Pennsylvania Stuffed Toys Act</li> <li>Massachusetts Law on Stuffed Toys</li> <li>Ohio Title 37 Health-Safety-Morals, Chapter 3713 'Bedding and Stuff Toys'</li> </ul>	EN 71 Part 1	<ul style="list-style-type: none"> <li>Canada Consumer Product Safety Act (CCPSA), Toys Regulations (SOR/2011-17)</li> <li>The upholstered and stuffed articles act</li> </ul>	AS/NZS ISO 8124 Part 1	ISO 8124 Part 1	ST Part 1	GB 6675.2	NM 300 - 1
Phthalates	<ul style="list-style-type: none"> <li>CPSIA (BBP, DBP, DEHP, DCHP, DHEXP (DnHP), DIBP, DPENP and DINP)</li> <li>CA AB 1108 (2007) (BBP, DBP, DEHP, DIDP, DINP and DNOP)</li> <li>California Proposition 65 (BBP, DBP, DEHP, DIDP, DINP and DnHP)</li> </ul>	<ul style="list-style-type: none"> <li>REACH Annex XVII (BBP, DBP, DEHP, DIBP, DIDP, DINP and DNOP)</li> <li>RoHS II (Directive 2011/65/EU)</li> </ul>	Canada Consumer Product Safety Act (CCPSA), Phthalates Regulations (SOR/2016-188) (BBP, DBP, DEHP, DIDP, DINP and DNOP)	Competition and Consumer Act, 2010 Consumer Protection Notice No. 11 of 2011 (DEHP)	ISO 8124 Part 6	<ul style="list-style-type: none"> <li>ST Part 3</li> <li>Japan Food Sanitation Law (JFSL)</li> </ul>	<ul style="list-style-type: none"> <li>GB 6675.1</li> <li>GB 24613 (coatings on toy)</li> </ul>	Ordinance No. 302 of July 12, 2021 (BBP, DBP, DEHP, DIDP, DINP and DNOP)*
Azo colorants and azo dyes	CA Prop 65	REACH Annex XVII	–	–	–	–	–	–
Cadmium	CA Prop 65	REACH Annex XVII	–	–	–	–	–	–
Nickel	CA Prop 65	REACH Annex XVII	–	–	–	–	–	–
Polycyclic aromatic hydrocarbons (PAHs)	CA Prop 65	<ul style="list-style-type: none"> <li>REACH Annex XVII</li> <li>German Product Safety Commission (AfPS) GS Specification</li> </ul>	–	–	–	–	–	–
Battery-operated toy safety test	ASTM F963 § 4.25	EN 62115	–	AS/NZS 62115	IEC 62115	ST Part 1	GB 19865	NM 300 - 6
Electrically operated toys	ASTM F963 16 CFR 1505	EN 62115	–	AS/NZS 62115	IEC 62115	–	GB 19865	NM 300 - 6
Hazardous substances in battery-operated/electrical toys	–	RoHS II (Directive 2011/65/EU)	–	–	–	–	–	–
Electromagnetic compatibility for battery-operated/electrical toys	–	EMC Directive 2014/30/EU	ICES Interference - causing Equipment Standard	Electromagnetic Compatibility (EMC) Regulations, C - Tick Mark	CISPR14 Part 1 & Part 2	Voluntary Control Council for Interference by Information Technology Equipment	Order No. 32 of 21 January 2016 (China RoHS II)	–
Radio-controlled frequency requirements	FCC Part 15 Radio Frequency Devices	RED 2014/53/EU	RSS Radio Standards Specifications	Electromagnetic Compatibility (EMC) Regulations, C - Tick Mark	–	Voluntary Control Council for Interference by Information Technology Equipment	–	–

Table 7

\*Ordinance No. 302 of July 12, 2021 also prohibits mercury, asbestos, 1,4-butanediol, ammonium nitrate, strong acids and bases in toys

# MEETING SAFETY REGULATIONS IN EUROPE

## CEN DEFINITION OF CHILDCARE ARTICLES:

- Any product designed or obviously intended to safely ensure and facilitate seating, bathing, changing and general body care, feeding, sleeping, transportation and protection for young children
- Childcare articles are intended to be used with children up to 4 years

## FRAME OF MAIN REGULATION (OTHER THAN REGULATION ON CHEMICALS LIST)


REGULATION AND REGULATORY REQUIREMENTS	GENERAL PRODUCTS SAFETY DIRECTIVE 2001/ 95/ EC  GENERAL PRODUCT SAFETY REGULATION (EU) 2023/988	FRENCH DECREE 91-1292 ON THE PREVENTION OF RISKS DUE TO THE USE OF CHILDCARE ARTICLES	BRITISH FURNITURE AND FURNISHING (FIRE) REGULATION NO. 1324 AND AMENDMENT NO. 2358
Scope	All consumer products	Childcare articles defined in the decree as follows: products intended to ensure or facilitate seating, washing, sleeping, transport, movement and physical protection of children less than 4 years	Mattresses and cushions, padded juvenile products such as products intended for seating or transportation; cots, etc. such as more generally defined furnishing products
Requirements	Products placed on the European market shall be safe	Products placed on the French market shall meet the safety requirements listed in the annex of the decree	Products listed in the regulation shall meet the flammability properties required for coverings and padding when tested with a cigarette and a match
Application	Compliance with national or European relevant standards, European Commission recommendations, product safety code of good practice, reasonable consumer expectations concerning safety	Compliance with safety requirements, and with relevant European Standards when published  Type examination	Testing in accordance with relevant British standards
Product information	Suitable product information and warnings shall be given	Adequate product information shall be given	Warnings (caution) to be attached as labels
Mark	–	–	Labelling 

Table 8a

## FRAME OF EU DECISION ON CERTAIN CHILDREN’S PRODUCTS

REGULATION	COMMISSION DECISION (EU) 2023/1338 on the safety requirements to be met by European standards for certain children’s products and related products
Scope	<p>(a) children’s products intended to be worn by children;</p> <p>(b) children’s products intended to facilitate or protect the seating function, sleeping function, bathing function, body care, relaxation, transportation and early learning;</p> <p>(c) children’s products intended to facilitate the feeding, drinking or sucking of children;</p> <p>(d) children’s products that offer one or several functions listed in points (a), (b) and (c) and one or several other functions;</p> <p>(e) products related to children’s products, including the following products:</p> <p>(i) products and accessories specifically designed for use with children’s products referred to in points (a)to (d) or in combination with those products;</p> <p>(ii) products to be used and mounted or installed by adults which are accessible to a child or offer a protective function to a child.</p>
Requirements	Listed in Annex
Application	This decision lists requirements that shall be included in the future standards to be developed, or revised accordingly
Product information	Listed in Annex
Mark	-

Table 8b

Reference: <https://eur-lex.europa.eu/legal-content/FR/TXT/?uri=CELEX%3A32023D1338>

## TYPE EXAMINATION – FRENCH DECREE 91-1292

- Conducted by any European (or Turkish) accredited laboratory
- Certificate of Conformity delivered after type examination procedure

REQUIREMENTS OF THE DECREE	CONDITIONS FOR APPLICATION
<ul style="list-style-type: none"><li>• General principles<ul style="list-style-type: none"><li>◦ Protection of user during normal or foreseeable use</li><li>◦ Product information</li></ul></li><li>• Mechanical and physical properties<ul style="list-style-type: none"><li>◦ Stability and strength</li><li>◦ Sharp edges and points, moving parts, assemblies</li><li>◦ Locking mechanisms and safety devices</li><li>◦ Small parts</li><li>◦ Child restraint systems</li></ul></li><li>• Flammability<ul style="list-style-type: none"><li>◦ Low flame propagation speed</li></ul></li><li>• Chemical properties<ul style="list-style-type: none"><li>◦ Ingestion, inhalation, skin contact</li><li>◦ Toxic fumes</li></ul></li><li>• Hygiene<ul style="list-style-type: none"><li>◦ Migration of heavy metals</li></ul></li></ul>	<ul style="list-style-type: none"><li>• There is no applicable standard published</li><li>• A standard exists, which is not published in the French Official Journal: this may be a French or European Standard</li><li>• The product presents an additional function, which is not covered by its applicable standard or by any other standards published</li><li>• Combination of two products creates a risk or a characteristic that is not covered by applicable standards</li><li>• Even if covered by an applicable standard, the product presents a risk</li></ul>
PROCESS	VALIDITY
<ul style="list-style-type: none"><li>• Product<ul style="list-style-type: none"><li>◦ Review of regulation</li><li>◦ Study of accident data</li><li>◦ Research on applicable documents</li></ul></li><li>• Protocol<ul style="list-style-type: none"><li>◦ Rationale of type examination procedure</li><li>◦ Risk analysis</li><li>◦ Test programme</li></ul></li><li>• Client review/approval by the applicant</li><li>• Documents issue<ul style="list-style-type: none"><li>◦ Type examination report</li><li>◦ Certificate of Conformity to the safety requirements</li></ul></li></ul>	<ul style="list-style-type: none"><li>• Type examination is delivered on one model</li><li>• Manufacturer or importer or distributor is responsible for the compliance of all products put on the market</li><li>• Regular update of the technical documentation is necessary</li><li>• Type examination is no longer valid if:<ul style="list-style-type: none"><li>◦ Knowledge of accidents, new requirements, recalls, etc. exist</li><li>◦ Any change is made on the product by the manufacturer</li><li>◦ A standard is published</li></ul></li></ul>

Table 9

## MEETING SAFETY REGULATIONS IN ALGERIA

Arrêté interministériel of 6 Chaoual 1437 corresponding to 11 July 2016 adopting technical regulations on safety requirements for childcare articles – effective on 27 May 2017.

According to the technical regulations, a childcare article means any product intended to ensure or facilitate sitting, general body care, sleeping, transportation, movement, physical protection and the feeding or sucking of children under 4 years.

Accessories for hygiene, bedding accessories and equipment to transport children in motor vehicles are excluded from the scope of the regulations.

The listed safety requirements include construction, locking mechanisms, small parts, strength, stability, restraint function, chemicals and flammability, as well as specific requirements for the restriction of phthalates and bisphenol A (BPA).

Product information shall be delivered in Arabic and one or more ancillary languages.

The mark 'Conforme aux exigences de sécurité' shall be affixed on the article or its packaging.

## MEETING REGULATORY STANDARDS IN THE US WITH JPMA

With increasing regulatory scrutiny of juvenile products, the Juvenile Products Manufacturers Association (JPMA) created a new protocol for testing that can help save companies time and money when introducing products to retail locations.

The JPMA Certification Program is based on conformance with ASTM standards, Federal Regulations (e.g. CFR and CPSIA) and individual state requirements, as well as some popular retailer requirements.

SGS is a JPMA approved 3rd party testing laboratory due to its extensive expertise and experience in quality, compliance and safety in the child care products industry, worldwide.

Benefits for retailers, manufacturers and importers:

- Appeals to both small and large manufactures as well as retailers
- Reduces testing duplication – with JPMA you can fulfil multiple retailer requirements with one testing program, saving time and money
- Increases confidence for both consumers and retailers through third-party testing
- Offers a more logical flow of testing in addition to being more comprehensive
- Sets the bar for what is accepted by government and retailers



SGS is a JPMA  
approved partner  
testing laboratory

## THE JPMA PROGRAMME INCLUDES A FOCUS ON UPSTREAM TESTING IN MANUFACTURING AND PRE-MARKET CERTIFICATION ON MORE THAN 30 CATEGORIES OF CHILDREN'S PRODUCTS.

- Baby monitors
- Bassinets and cradles
- Bath seats
- Bedside sleepers
- Booster seats
- Carriages/strollers
- Baby changing products
- Children's folding chairs
- Crib mattresses
- Expandable gates and enclosures
- Frame child carriers
- Full-size cribs
- Hand-held infant carriers
- High chairs
- Infant bouncer seats
- Infant floor seats
- Rockers
- Infant bath tubes
- Infant bathers
- Infant swings
- Infant walkers
- Non-full-size baby cribs/play yards
- Portable bed rails
- Portable hook-on chairs
- Sling carriers
- Soft infant carriers
- Stationary activity centers
- Toddler beds
- Child safety locks & latches

# LABELING FOR THE US MARKET

## TRACKING LABEL REQUIREMENTS FOR CHILDREN’S PRODUCTS

Children’s products, including juvenile products, designed or intended primarily for children 12 years of age or younger are obliged by law (Section 103 of CPSIA) to have ‘distinguishing permanent marks’ (commonly referred to as ‘tracking labels’) on the product and its packaging, to the extent practicable, to enable the manufacturer to ascertain the specific source of the product. These requirements have been effective since August 2009.

The US manufacturer for products manufactured domestically and the importer for products manufactured overseas are responsible for compliance with the tracking-label requirements. Importers should work with their overseas manufacturers to ensure compliance.

The information on the tracking label should be visible and legible and must contain certain information, including:

- The name of the manufacturer or private labeler
- The location and date of manufacture of the product
  - The names of the city and country where the product was manufactured are sufficient
  - The date of production could be a range of dates
  - The date of manufacture for a group of disparate components or items assembled together or gathered into one package is the date of assembly or placement
- Cohort information, such as the batch number, run number or other identifying characteristics
- Any other information to facilitate ascertaining the specific source of the product

The law requires the ‘permanent’ mark, to the extent practicable, on both the product and its packaging. The ‘permanent’ mark on the product can reasonably be expected to remain on the product during the useful life of the product. A mark is not required to be placed on the packaging if it is visible on the product through disposable packaging. The required information already permanently marked either to brand the product or otherwise to comply with other European Commission or federal regulation (e.g. Textile, Wool and Fur Act or country of origin labelling rules) could be considered as part of the ‘distinguishing marks’.

The use of adhesive labels is allowed provided such labels are permanent and maintain their integrity throughout the product’s life span. The use of hangtags and adhesive labels, however, is not regarded as permanent.

In the event that it is not practical to affix the tracking label to the product, it may still be practical to affix the tracking label information to the packaging of the product. In situations where it is not practical for tracking labels to be printed on small products without individual packaging, markings should be on the package or carton in which the products are shipped to the retailer. The mark can also be in the form of a code and website address provided the ascertainable information required (name of manufacturer, importer or private labeler) is also identified so that the required information can be obtained when the manufacturer, importer or private labeler is contacted.

## 16 CFR 1130: CONSUMER REGISTRATION OF DURABLE INFANT OR TODDLER PRODUCTS

The rule applies to the following product categories:

- |   |  |                               |
|---|--|-------------------------------|
| • Bassinets and cradles                   | • Gates and other enclosures for confining a child | • Play yards                  |
| • Bath seats                              | • High chairs, booster seats, and hook-on chairs   | • Stationary activity centers |
| • Bed rails                               | • Infant bathtubs                                  | • Strollers                   |
| • Bedside sleepers                        | • Infant bouncers                                  | • Swings                      |
| • Changing tables                         | • Infant carriers                                  | • Toddler beds                |
| • Children's folding chairs               | • Infant sleep products                            | • Walkers                     |
| • Full-size cribs and non-full-size cribs | • Infant slings                                    |                               |
| • Crib mattresses                         |  |                               |

In order to improve recall effectiveness, manufacturers of covered products are required to:

- |  |  |   |
|--|--|---|
| • Provide consumers with a postage-paid consumer registration form with each product | addresses and other contact information of consumers who register their products | contact information, model name and number, and the date of manufacture on each durable infant or toddler product |
| • Maintain a record of the names, addresses, e-mail                                  | • Permanently place the manufacturer’s name and                                  |   |

The domestic manufacturer or the importer (of foreign-made products) is responsible for compliance. The importer is responsible for complying with all the requirements in the rule since non-US manufacturers are considered as importers.

## US FORMALDEHYDE STANDARDS FOR COMPOSITE WOOD PRODUCTS

In July 2010, US President Barack Obama signed into law the ‘Formaldehyde Standards for Composite Wood Products Act (the Act)’. This landmark piece of legislation became the amendment and Title VI of the ‘Toxic Substances Control Act (TSCA)’, and set the standard for formaldehyde emissions from composite wood products that are manufactured (defined by Statute to include import), offered for sale, sold or supplied in the United States. The law also authorized the US Environmental Protection Agency (EPA) to develop regulations to implement the Act.

The Final Rule, as amended by the EPA, includes a number of safeguards to ensure the safety of composite wood products destined for the US market. This Final Rule includes provisions relating to, among other things, formaldehyde emission standards in hardwood plywood composite core or veneer core (HWPW-CC or VC), particleboards (PBs) and medium density fiberboards (MDFs), third-party certification programs, incentives for products manufactured from ultra-low emitting formaldehyde resins (ULEF) and no added-formaldehyde-based resins (NAF), product labelling, accreditation bodies (ABs) and third-party certifiers (TPCs). It also requires additional responsibility from various economic operators in the supply chain, specifically manufacturers of composite wood panels, manufacturers of laminated products, fabricators, importers, distributors and retailers to ensure the traceability of (compliant) composite wood products from factories to store shelves.

The formaldehyde standards are identical to those in Phase 2 of the Airborne Toxics Control Measure (ATCM) to Reduce Formaldehyde Emission from Composite Wood Products under the California Air Resources Board (CARB). The formaldehyde emission standards can be tested using ASTM E1333 (large chamber), subject to demonstrating equivalence, or ASTM D6007 (small chamber) and their compliance dates are summarized in Table 10.

FORMALDEHYDE EMISSION STANDARDS USING ASTM E1333 OR ASTM D6007		
COMPOSITE WOOD	REQUIREMENT	COMPLIANCE DATE
HWPW-VC or HWPW-CC	≤ 0.05 ppm	1 June 2018
PB	≤ 0.09 ppm	1 June 2018
MDF	≤ 0.11 ppm	1 June 2018
Thin-MDF (≤ 8 mm thickness)	≤ 0.13 ppm	1 June 2018
Laminated products within the meaning of HWPW	≤ 0.05 ppm	22 March 2024

Table 10

The obligations facing economic operators in the supply chain depend upon their role – and they may have one or more roles (Table 11).

ECONOMIC OPERATOR	REQUIREMENT	COMPLIANCE DATE
Manufacturers of composite wood panels (mills)	Manufactured-by date for formaldehyde emissions from panels	1 June 2018
	Unless products are eligible for limited exemption made with NAF-based or ULEF resins, products must be certified by a TPC that is recognized by the EPA	
	Quarterly testing and routine control testing	
	Labelling	
	<ul style="list-style-type: none"> <li>Documentation and record keeping (for 3 years)</li> <li>Documentation and record keeping for reduced testing and limited third-party certification exemption for products made with NAF-based or ULEF resins (must be kept for as long as exemption is claimed)</li> </ul>	
Fabricators other than manufacturers of laminated products	<ul style="list-style-type: none"> <li>Documentation and record keeping (for 3 years)</li> <li>Label compliant finished goods</li> </ul>	1 June 2018
Manufacturers of laminated products that are not exempt from the definition HWPW	<ul style="list-style-type: none"> <li>Documentation and record keeping (for 3 years)</li> <li>Label compliant goods</li> </ul>	1 June 2018
	Other requirements are as for manufacturers of composite wood panels above	22 March 2024
Manufacturers of laminated products that are exempt from the definition HWPW	<ul style="list-style-type: none"> <li>Documentation and record keeping (for 3 years)</li> <li>Label compliant goods</li> </ul>	1 June 2018
	Records demonstrating purchase/use of compliant platforms and NAF or PF	22 March 2024
Importer	Documentation and record keeping (for 3 years)	1 June 2018
	Import certification	22 March 2019
Distributor and retailer	Documentation and record keeping (for 3 years)	1 June 2018

Table 11

After 22 March, 2019, CARB-TPCs must be fully accredited to remain as an EPA TSCA Title VI TPC to continue certifying products as TSCA Title VI compliant.

### CALIFORNIA AIRBORNE TOXIC CONTROL MEASURE (ATCM) TO REDUCE FORMALDEHYDE EMISSIONS FROM COMPOSITE WOOD PRODUCTS

In April 2007, the California Air Resources Board (CARB) approved the Airborne Toxic Control Measure (ATCM) to regulate formaldehyde emission requirements in composite wood products; a general term for wood-based panels manufactured from wood pieces, particles or fibers bonded together with resins. The formaldehyde emission standards were implemented in two phases. Phase 1 was implemented in January 2009 and Phase 2 during 2010-2012. The specific composite wood products are:

- Hardwood plywood (HWPW). This applies to HWPW with a veneer core (HWPW-VC) or with a composite core (HWPW-CC)
- Particleboard (PB)
- Medium density fiberboard (MDF) including thin MDF (≤ 8 mm thick)

The ATCM applies to panel manufacturers, distributors, fabricators, importers and retailers of products manufactured from HWPW, PB and MDF destined for California. Panel manufacturers of HWPW, PB and MDF must be certified by a third-party certifier approved by CARB. Such panel manufacturers must label their products, and to demonstrate that their products comply with the formaldehyde emission standards by means of invoices or bills of lading stating as such.

Fabricators who use compliant panels must label their finished products as being manufactured from compliant panels. The label can be applied as a stamp, tag, sticker or bar code on every finished product or on every box containing the finished products. Distributors, importers and fabricators are also required to provide documentation to their customers (retailers) to demonstrate that their products are compliant.

The labelling requirements for manufacturers, fabricators, distributors, importers and retailers of composite wood products are summarized in Table 12.

In the event of a difference between CARB and US EPA requirements, the more stringent requirement applies to composite wood panels and finished goods for California.

CARB accepts the TSCA Title VI label as being CARB compliant because the TSCA Title VI and CARB formaldehyde emission standards are the same.

LABEL	PANEL MANUFACTURER	FABRICATOR	DISTRIBUTOR/ IMPORTER/RETAILER
Minimum information	<ul style="list-style-type: none"> <li>Name</li> <li>Product lot number or batch number</li> <li>CARB-assigned number for third-party certifier (TPC)*</li> <li>Marking to denote 'compliance with Phase 2 requirements of the ATCM'</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>Date finished product produced (mm/ yyyy)</li> <li>Statement of compliance with the ATCM</li> <li>Finished goods made with NAF/ULEF - based resins to be labelled as such</li> </ul>	<ul style="list-style-type: none"> <li>No additional labelling required (distributors and importers only require labelling if products are modified)</li> </ul>
Other recommendations	<ul style="list-style-type: none"> <li>Label each individual panel</li> <li>Date of manufacture (mm/dd/yyyy)</li> <li>Statement of compliance containing at least the words 'California' or 'CARB', section 93120, compliance phase or NAF/ULEF</li> </ul>	<ul style="list-style-type: none"> <li>Label both finished goods and box containing finished goods</li> <li>Statement of compliance to contain the word 'California' or CARB, 93120, compliance phase or NAF/ULEF</li> </ul>	
Example of label	<ul style="list-style-type: none"> <li>Company ABC</li> <li>Lot number 3, 02/05/2016</li> <li>California 93120 Phase 2 Compliant for Formaldehyde</li> <li>TPC_ _</li> </ul>	<ul style="list-style-type: none"> <li>Company ABC 02/2016</li> <li>California 93120 Phase 2 Compliant for Formaldehyde or</li> <li>California 93120 Complaint for Formaldehyde – produced with all NAF-based products or</li> <li>California 93120 Compliant for Formaldehyde – produced with all ULEF - based products</li> </ul>	

Table 12

\*Not required if the products are exempt from third-party certification by using no-added formaldehyde (NAF) and contain certain ultra low-emitting formaldehyde (ULEF)-based resins after approval from CARB.

Reference: [https://www.arb.ca.gov/toxics/compwood/outreach/advs384\\_1116.pdf](https://www.arb.ca.gov/toxics/compwood/outreach/advs384_1116.pdf)

## CANADA FORMALDEHYDE EMISSIONS FROM COMPOSITE WOOD PRODUCTS REGULATIONS

In July 2021, Canada published its Formaldehyde Emissions from Composite Wood Products Regulation (the Regulations, SOR/2021-148). This legislation mirrors many of the elements from the US Toxic Substances Control Act Title VI 'Formaldehyde Standards for Composite Wood Products (TSCA Title VI) in regulating hardwood plywood (HWPW), particleboard (PB), medium-density fiberboard (MDF) and laminated products.

### LABELLING REQUIREMENTS

#### COMPOSITE WOOD PRODUCTS

- A manufacturer or importer of composite wood panels must ensure that a stamp, tag or sticker in English and French is securely affixed to such panels, the bundle that contains them or their packaging. The label must include the following information:
  - Name of composite wood panel manufacturer
  - Lot number; and
  - Either
    - the statement 'TSCA Title VI compliant / conforme au titre VI de la TSCA' or 'TSCA Title VI certified / certifié conformément au titre VI de la TSCA' and name of third-party certifier (TPC) or number that the US EPA assigned to it, for product that is compliant with or certified under TSCA Title, or
    - the statement 'CANFER compliant / conforme au CANFER' and the name of the TPC, for product that is included in a declaration of certification produced under paragraph 19(1)(b)

#### OTHER COMPOSITE WOOD PRODUCTS

- A manufacturer or importer of laminated products, component parts or finished goods must affix a label in English and French on these products, the bundle that contains them or their packaging. The label must include the following information:
  - Name of manufacturer, importer or seller
  - Month and year of manufacture, and
  - Either
    - the statement 'TSCA Title VI compliant / conforme au titre VI de la TSCA' or 'TSCA Title VI certified / certifié conformément au titre VI de la TSCA', for product that is incorporated into the component parts or finished goods is compliant with or certified under TSCA Title VI or for laminated products that are a product type that is compliant with or certified under TSCA Title VI, or
    - the statement 'CANFER compliant / conforme au CANFER' for products that are incorporated into the component parts of finished goods are either included in a declaration of certification (DoC) by virtue of paragraph 19(1)(b) or are certified under TSCA Title VI or if the laminated products are a product type that is included in a DoC by virtue of paragraph 19(1)(b)



## SUMMARY OF LABELING REQUIREMENTS

Labeling elements for composite wood panels, laminated products and finished goods	
COMPOSITE WOOD PANELS	LAMINATED PRODUCTS AND FINISHED GOODS <sup>1</sup>
Name of manufacturer	Name of manufacturer, importer or seller
Lot number	Date of manufacture
Name of TPC (or US EPA number assigned to TPC)	
One of the following compliance statements: <ul style="list-style-type: none"><li>CANFER compliant / conforme au CANFER</li><li>TSCA Title VI compliant / conforme au titre VI de la TSCA</li><li>TSCA Title VI certified / certifié conformément au titre VI de la TSCA</li></ul> Optional information: <ul style="list-style-type: none"><li>'NAF/SFA' or 'no added formaldehyde / sans formaldéhyde ajouté</li><li>'ULEF /TFEF' or 'ultra-low-emitting formaldehyde / à très faibles émissions de formaldéhyde'</li></ul>	

Table 13

<sup>1</sup>Finished goods include component parts that are sold separately

The Regulation came into force on January 7, 2023 but the requirements for laminated products will apply from January 7, 2028. The formaldehyde emission standards for composite wood panels and laminated products are summarized in Table 14.

Formaldehyde Emissions from Composite Wood Products Regulations (SOR/2021-148 June 17, 2021)				
Substance	Scope of Composite Wood Panel or Laminated Product	Method	Requirement	Date of Entry into Force
Formaldehyde Emission	Hardwood Plywood (HWPW)	ASTM E1333 (large chamber)	≤ 0.05 ppm	January 7, 2023
	Particleboard (PB)	or	≤ 0.09 ppm	
	Medium-density fiberboard (MDF)	ASTM D6007 (small chamber, subject to demonstrating equivalence)	≤ 0.11 ppm	
	Thin-MDF		≤ 0.13 ppm	
	Laminated Products <sup>1</sup>		≤ 0.05 ppm	
<sup>1</sup> Apply from January 7, 2028				

Table 14

## CALIFORNIA PROPOSITION 65 (PROP 65)

Prop 65 is the 'Safe Drinking Water and Toxic Enforcement Act' of 1986, a ballot initiative passed overwhelmingly by California residents in 1986. It requires the state to publish a list of chemicals that are known to cause cancer, birth defects or reproductive harm. First published in 1987, the list is updated at least once per year and has now evolved to more than 900 chemicals.

Prop 65 places two important provisions for companies doing business in California. These are:

- Providing a clear and reasonable warning before knowingly and intentionally exposing anyone to a listed chemical – enforced 12 months after a chemical is listed.
- Prohibited from knowingly discharging a listed chemical into sources of drinking water – enforced 20 months after a chemical is listed.

Businesses with fewer than ten employees and government agencies are exempt from these two provisions. Businesses are also exempt from these provisions if the exposures create no significant risk of cancer, birth defects or other reproductive harm.

In August 2016, California adopted new Prop 65 warnings. These apply to products manufactured after August 2018 but pre-existing settlements or judgements covering specific Prop 65 warnings will remain in effect.

Over the years, consumer products containing 4,4'-methylenedianiline (4, 4'-MDA), bisphenol A (BPA), formaldehyde, flame retardants (tris-(1,3-dichloro-2-propyl) phosphate, TDCPP), tris(2,3-dibromopropyl) phosphate (TDBPP) and tris(2-chloroethyl) phosphate (TCEP)), heavy metals (lead and cadmium), n-nitrosodiethylamine (NDEA), n-nitrosodimethylamine (NDMA), perfluorooctanoic acid (PFOA) and phthalates have been targeted.

Reference: <https://www.p65warnings.ca.gov/>

# PACKAGING MATERIALS FOR JUVENILE PRODUCTS (EU/US)

## EUROPEAN UNION

In 1994, the European Union (EU) adopted the packaging and packaging waste Directive 94/ 62/ EC to:

- i. Prevent or reduce the impact of packaging and packaging waste to the environment
- ii. Reduce the quantity of packaging waste for final disposal through reuse, recycling and other forms of recovery

The directive has three main packaging categories:

- i. Primary or sales packaging
- ii. Secondary or grouped packaging
- iii. Tertiary or transport packaging

Packaging materials are obliged to fulfil the concentration limit for four heavy metals (cadmium, chromium (VI), lead and mercury) under the packaging directive. Packaging is usually considered as an article under REACH and is obliged to comply with provisions for articles such as substances of very high concern (SVHCs) on the Candidate List.

Packaging with different functions (primary, secondary or tertiary packaging) is considered separately.

## UNITED STATES

In the US, the Toxics in Packaging Clearinghouse (TPCH) was formed in 1992 to promote the Model Toxics in Packaging Legislation. This legislation was developed in 1989 to reduce the quantity of cadmium, chromium (VI), lead and mercury to no more than 100 ppm in packaging and packaging components. The model has been adopted by 19 states: California\*, Connecticut, Florida, Georgia, Illinois, Iowa, Maine, Maryland, Minnesota, Missouri, New Hampshire, New Jersey, New York, Pennsylvania, Rhode , Vermont, Virginia, Washington and Wisconsin.

In February 2021, the US TPCH issued an update to its Model Legislation by expanding the list of chemicals to include (ortho) phthalates and perfluoroalkyl and polyfluoroalkyl substances (PFAS). Each state may adopt changes to its existing law or adopt a new law to address toxics in packaging.

*\*It is important to note that packaging materials are also regulated by Prop 65.*

## CERTIFICATE OF COMPLIANCE (COC)

In the model legislation, a manufacturer or supplier of packaging components must, upon request, furnish a COC to its customers stating that a packaging component or packaging material is in compliance with the requirements. This provision does not apply to the retailer or consumer, only to companies whose products are in the package. A signed copy of the COC must be kept as long as the package or packaging component is in use.

# MEETING SAFETY REGULATIONS IN BRAZIL

Compulsory certification is required for the following products:

	REGULATION	STANDARD	REGULATORY AGENCY
Baby bottles and nipples	Inmetro Ordinance 216/2021	NBR 13793	Inmetro and Anvisa
Baby strollers	Inmetro Ordinance 167/2021	NBR 14389	Inmetro
Baby walking frames	Inmetro Ordinance 129/2021	ABNT/NBR 16311	Inmetro
Child cots and folding cots	Inmetro Ordinance 143/2021	NBR 15860-1 and -2	Inmetro
Child restraint systems	Inmetro Ordinance 246/2021	ABNT/NBR 14400 FMVSS nº 213 ECE nº R129	Inmetro
High chairs	Inmetro Ordinance 168/2021	NBR 15991-1 and -2	Inmetro
Mattresses	Inmetro Ordinance 35/2021 and 75/2021	NBR 13579-1 and -2 ABNT NBR 15413-1 and -2	Inmetro
Pacifiers/soothers	Inmetro Ordinance 301/2021	NBR 10334	Inmetro and Anvisa
School articles	Inmetro Ordinance 423/2021	NBR 15236	Inmetro
Table mounted chairs	Inmetro Ordinance 168/2021	NBR 15991-1 and -2	Inmetro
Toys	Inmetro Ordinance 302/2021	ABNT NMR 330 Parts 1 to 6 ABNT NBR 13793 IEC 60825-1	Inmetro

Table 15



**FOR MORE INFORMATION:**

[www.sgs.com/juvenileproducts](http://www.sgs.com/juvenileproducts)

*This document contains guidance on juvenile products' testing for the quality assurance industry. Its contents are subject to changes due to new market requirements. Users are reminded that legislation is the only authentic legal reference information and that information in this document does not constitute legal, technical or other professional advice. SGS does not accept any liability with regard to the contents of this document. For the latest updates, please refer to SGS regulatory bulletins SafeGuardS written by SGS experts and subscribe for free at [www.sgs.com/subscribe](http://www.sgs.com/subscribe) or contact your local SGS technical team. SGS reserves the right to change the contents of this document without notice.*