



# Chemical Safety of Toys

Regulative Systems and  
Consumer Education



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**Chemical Safety of Toys**  
**Regulative Systems and Consumer Education**  
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## Introduction

Consumer protection issues have always been on the agenda in the contemporary marketing world. More and more various products are appearing on the market and the supply is changing all the time. To keep this process controlled and to protect the consumer against different hazards that might appear when buying different products, clear regulation and control mechanisms are needed.

One of the fields where consumers have a potential risk of coming in contact with hazardous or potentially hazardous substances is by using toys and children products.

Since Albania, Macedonia and Serbia (further on Balkan countries) are not members of the EU, there are different legislative systems set up by countries compared to the EU system. Although the regulations are known to be at place, experience shows that consumers in these countries lack knowledge about the information on consumer friendly products. The non-governmental organisations (NGOs) in these countries in many cases have low capacities and might be facing the same gap of knowledge. The direct communication from these organizations to the general public seems to be weak.

Therefore in order to strengthen the capacities of the Balkan stakeholders this manual was prepared with the main aim to give information and tools on consumer awareness raising and education concerning safety of toys from chemicals hazards.

The main target group of the manual are NGOs working with consumer protection issues and addressing the general public. However, the information provided in this manual can also be useful to state authorities, teachers and students interested in these issues.

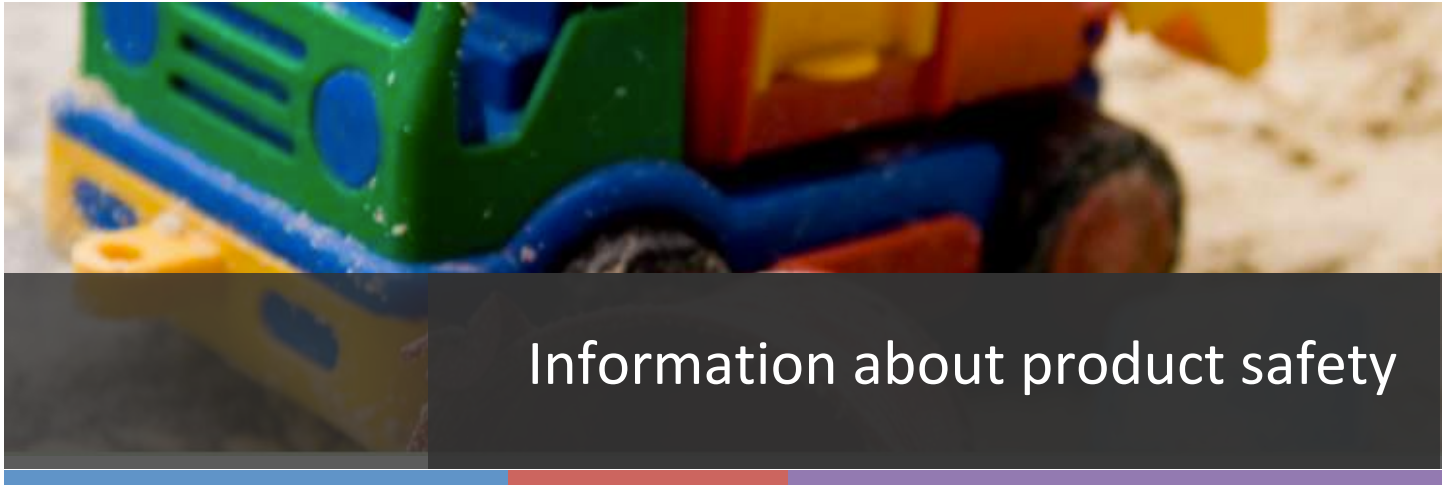
This manual has been prepared as a part of the project "Product and chemical safety in the Balkans – civil society cooperation on EU acquis and values for consumer and corporate responsibility" supported by the European Union (EU) and implemented by project partners from Women in Europe for a Common Future, Baltic Environmental Forum Estonia,

Journalists for human rights, Women's Movement for Integral Development and the Resource Center Leskovac.

The first chapter gives an understanding of the requirements for general product safety in the EU and respective Balkan countries. It describes the legal framework and definition of a 'safe product'. The second chapter deals with the hazards of chemicals in general and gives information on possible negative effects of chemicals in consumer goods. The principle ways to reduce the potential risks from chemicals are presented in third chapter. The fourth chapter is about safety of toys. It describes the regulative system and requirements for safe toys, gives overview about inventories what have been carried out in respective Balkan countries (Macedonia, Albania and Serbia) and finally introduces some tips for safe toys. The fifth chapter gives an introduction to the market surveillance concept, why do countries need an effective market surveillance system and examples of systems in different countries. The chapter also deals with the roles of different stakeholders in market surveillance system. The ways for NGOs to influence communication on chemicals and risk reduction in using chemicals as well as to influence consumer behaviour are described in sixth chapter of the manual.

The manual contains also several annexes:

- Annex 1: Legal acts and definition for product safety
- Annex 2: Legal acts and requirements for toys safety from chemicals hazards in EU and in Balkan countries
- Annex 3: Rules for labelling of toys in EU and in Balkan countries
- Annex 4: Figures and facts on the European toy industry
- Annex 5: Market surveillance system in EU members states (MS) country by country
- Annex 6: Albanian Inventory
- Annex 7: Macedonian Inventory
- Annex 8: Serbian Inventory



## Information about product safety

### 1.1 Product safety

“Product safety” refers to the physical health and safety of citizens with regards to non-food products, such as toys, household appliances, cars and cosmetics. It is designed to reduce the number of injuries and fatalities caused by non-food products.

European citizens must be confident that the products they use, consume or simply come into contact with are safe and do not present any danger to their health and physical safety. While the vast majority of products available are safe, a small percentage could potentially pose a risk to the safety of consumers.

#### 1.2.1. Legal framework

Sector-specific legislation provides precise technical rules applicable for a number of products in different sectors, ranging from motor vehicles and electrical equipment to agricultural products, toys, chemicals and cosmetics.

The European Commission publishes the “Pink Book”, which is regularly updated and lists all the products under concern and the specific requirements. The General Product Safety Directive (GPSD) lays down product safety requirements for all other non-food consumer products. It provides a generic definition of a safe product and establishes an alert system on dangerous products (RAPEX) – look description in the Annex 1.

The GPSD also defines the respective requirements of business and national authorities: manufacturers are required to place only safe products on the market and EU Member States (MS) must take the necessary measures to enforce the requirements on producers and distributors.

Legal acts and definitions concerning general product safety in EU, Albania, Macedonia and Serbia are described in Annex 1.

#### 1.2.2. Market surveillance

Market surveillance plays a crucial role in the field of consumer product safety. That is why effective market surveillance is so important; not only to protect

consumers from unsafe products but also to ensure a level playing field for reputable businesses.

In the European Union, market surveillance for non-food consumer products is the responsibility of the Member States. Under the General Product Safety Directive (GPSD), the Member States nominated or established authorities with responsibility for market surveillance. These authorities must have the necessary resources and powers at their disposal for surveillance activities. In practice this means they check that products meet the applicable safety requirements, that steps are taken to make products compliant, and that sanctions are applied when necessary.

Detailed information about market surveillance is described in Chapter 5 of this manual.

#### 1.2.3. International cooperation

Under the Transatlantic Economic Partnership between the EU and the USA guidelines to strengthen cooperation were agreed in 2005. In 2006 a Memorandum of Understanding (MoU) between the EU and China was signed to improve communication and cooperation in the field of product safety. The same year a roadmap was agreed to improve the safety of Chinese toys exported to the EU. These two agreements are of major importance, since China has become one of the leading trading partners of the EU. Nearly half of all dangerous products and 85% of dangerous toys detected under the RAPEX system originate from China.



## Information about chemicals and possible risks

Chemicals<sup>1</sup> are used every day, everywhere and by everybody at work (e.g. if you work in textile industry you print fabrics with dyes) or at home (e.g. you paint your walls, treat your car with car care products). They satisfy a lot of our needs and without them it might be unthinkable to organize our lives. Without chemicals we wouldn't have many of the products that we use today.

Each of these products may contain substances that could be hazardous to humans and to the environment. This chapter will introduce information about possible risks to health and environment.

Most of the chemicals in consumer goods are a part of a product and thus cannot be recognized. For instance the chemical content of toys is not indicated on their labels which make it difficult for consumers to know what chemicals the product contains and whether it is friendly or harmful to health.

Not all chemicals harm human health or the environment; nevertheless, there are many substances that give a reason for concern. Possible negative effects are following:

- **acute toxicity:** effect of substances that cause harm to human health immediately after a human comes into contact with them;
- **chronic toxicity:** the effect of substances on human health and the environment that can be noticed only after a long time period;
- **bioaccumulation:** the effect of chemicals when they accumulate in live organisms and travel in long distances across the world;
- **synergy:** some substances on their own may not harm people, other living organisms and/or the natural environment, but because of exposition (via skin, inhalation or ingestion) to many different chemicals at the same time, they may 'add up' and enhance their effects.

Consumers come in direct contact with chemicals every day. This exposure happens in various ways: ingestion, lungs, skin and through injuries. Figure 1 summarizes the possible scenarios of human exposure to chemicals.

Chemicals hazardous to human health are classified<sup>1</sup> as:

- **carcinogens** – substances that may cause cancer;
- **mutagens** – substances that can cause changes in genes resulting in different kinds of changes in body functions;
- **reprotoxic substances** – substances that cause disturbances in fertility or the development of unborn children.

Figure 1: Scenarios of human exposure to chemicals

According to the possible harmful effects these chemicals can cause they can furthermore be classified into the following bigger sub-groups:

- Carcinogens, mutagens and reprotoxic substances are classified into one group: **carcinogenic, mutagenic and reprotoxic substances (CMRs)**;
- **Respiratory sensitizers and endocrine disruptors** are groups of chemicals that are regarded as 'similarly dangerous' to human health and they promote or cause allergies when being inhaled and/or have effects on the hormone system. These effects may become visible only a long time after a person has come into contact with the respective chemical.

Other effects of dangerous substances become visible directly after a person has been exposed to a chemical, such as narcotic effects (dizziness, headaches), corrosivity (burns on the skin) or acute toxicity (poisons).

## Children are surrounded by many products, containing many different substances.

### 2.2 Substances that are harmful to the environment

Substances hazardous to the environment may also have different effects. Some substances, such as halogenated hydrocarbons, can deplete the ozone layer, some contribute to global warming and others contribute to eutrophication of waters and soils or are toxic to living organisms.

Substances reach the natural environment as emissions from industrial processes (air pollution, releases in wastewater and waste) and via the products we use. Many substances are quickly destroyed in the environment, either by physicochemical processes (sunlight, reaction with oxygen, etc.) or by biological processes like metabolisation of microorganisms.

Chemical substances that are not destroyed and thus remain in the environment for a long time (persistence), that accumulate in living organisms (bioaccumulation) and that cause eco-toxic effects are regarded as the most hazardous for the environment. They can be transported long distances and can end up in remote areas where they have never been used. For example, the chemical properties of polychlorinated biphenyls (PCBs) (low water solubility, high stability and semi-volatility) enhance during their long range transport, thus PCBs have been detected in arctic air, water and organisms.

When hazardous substances accumulate in organisms and in the food chain, concentrations in bodies may exceed levels above which adverse effects can occur. By being at the end of many food chains, humans are exposed to these substances via their food (secondary poisoning).

### 2.3. Most vulnerable consumers

Some groups of consumers are more at risk than others. Some are more sensitive, i.e., for some the amount of a substance causing an effect is lower than for others or the effect of a substance may be more serious. Children, and thus also pregnant women and breastfeeding mothers, allergic people and the elderly are more sensitive to hazardous chemicals. The most vulnerable group of humans are babies and small children because their bodies are still developing. Other groups of humans may be more vulnerable because their immune and repair systems have weakened due to age or chronic diseases. Some chemical effects can even be different in men and women. This mainly concerns substances which influence the hormone and reproductive system.

It is important to understand that not all substances pose risks to humans or the environment at all times or under any circumstances. If the environment or people are not exposed to a substance or a substance does not have dangerous properties, no risk occurs. The different ways of how risks can be prevented are described in this chapter.

A chemical substance can only cause a harmful effect on human health or the environment when two criteria are fulfilled:

- a) the chemical substance (whether as single substance or contained in a preparation or article) has got dangerous properties;
- b) the substance comes into contact with a human or is released to the environment.

Thus, hazard (e.g., toxicity of chemical substance) and exposure (extent of contact with humans or the environment) together pose the risk for a harmful effect.

**RISK = HAZARD × EXPOSURE**

Therefore, if a substance is not dangerous, no risk occurs. If the substance is dangerous, but it never gets in contact with people and/or the environment, then there is no risk, either. Those chemical substances which pose a risk because they are dangerous and they come into contact with humans are of interest. The more dangerous and the higher the exposure, the higher is the risk. For example, a baby is at a higher risk from PVC flooring in its nursery than in the cellar simply because it would never crawl in the cellar.

Consumers can choose between two different strategies<sup>1</sup> to prevent or reduce chemical risks in their every-day behaviour:

- a) use of substances / chemicals / articles which are not dangerous;
- b) prevent or reduce contact with dangerous substances.

For consumers both ways of risk reduction are possible.

**The first strategy** means to avoid buying and using chemicals and articles that contain hazardous substances. The content of hazardous substances in articles is usually not so easily visible and getting information on an article's composition is usually not possible. Special labels such as eco-labels indicate that certain hazardous substances are not found in an article and can facilitate the decision on which product to buy. Not buying and using products containing hazardous substances results in risk prevention for human health and the environment at the same time.

**The second strategy** means to take measures that prevent the chemical substance from getting into contact with humans or the environment. Precautionary principle is a very important approach found in the environmental policy today. It means to take measures against a potential risk even though scientific evidence may not yet be sufficient to be sure that an effect will actually occur. In the field of chemicals, this means to take risk reduction measures by either substituting substances (using less hazardous substances or using totally different materials) or by preventing exposure to humans and the environment. There are many products where alternatives to hazardous chemicals are already available.



Babies and children are more susceptible to the adverse effects of toxic chemicals than adults and therefore it's particularly important to pay attention to their well-being. Toys on the market have to be safe. When placing products on the market, the producers have to guarantee that their products are safe and in accordance with the law. Experience tells us that this is not always the case.

EU Member States shall take all measures necessary to ensure that toys may not be placed on the market unless they comply with the essential safety requirements set out. Toys, including the chemicals they contain, shall not jeopardize the safety or health of users or third parties when they are used as intended or in a foreseeable way, bearing in mind the behaviour of children.

#### 4.1. Regulative system and requirements for safe toys

Toy safety is the practice of ensuring that toys, especially those made for children, are safe, usually through the application of set safety standards. In many countries, commercial toys must be able to pass safety tests in order to be sold.

In Europe, the comprehensive legislation addressing toy safety is the Toy Safety Directive of the European Union. CE (European Conformity) Mark is a mandatory requirement denoting conformity with all applicable directives. In Europe toys must meet the criteria set by the EC Toy Safety Directive (essentially that a toy has to be safe, which may be addressed by testing to European Standard EN71) in order for them to carry the CE mark. Some items specifically excluded from this legislation are: fashion jewellery for children, Christmas decorations, and sports equipment.

The Toy Safety Directive provides EU-wide harmonized standards on physical and mechanical properties, flammability, chemical properties and electrical properties but certain essential safety aspects of the directives are not governed by safety standards e.g. hygiene and radioactivity. When an

unsafe toy is withdrawn from the EU market, all MS authorities will be notified by means of the RAPEX alert system.

The ability to recall a product from the market is a necessary part of any safety legislation. If existing quality and safety checks fail to detect an issue prior to sale, a systematic method of notifying the public and removing potentially hazardous products from the market is needed.

Choking is the number one reason for accidents, but chemicals can also cause developmental problems like behavioural disorders and sickness. For example exposure to lead can affect almost every organ and system in the human body, especially the central nervous system. Lead is especially toxic to the brains of young children.

#### Safety requirements which EU Member States need to respect regarding toys safety:

##### *Chemical substances*

Children, as a vulnerable group of consumers, need to be protected against risks caused by chemical substances in toys. In order to ensure a high level of protection, the rules related to their use have been strengthened.

- Chemicals that could provoke cancer, change genetic information or harm reproduction, **so-called CMR** (Carcinogenic, Mutagenic or toxic for Reproduction) substances are not allowed in accessible parts of toys. But a wide derogation system still allows the presence of CMR substances in toys, if they are not accessible to children, are present in low concentration or are granted an authorization by a scientific committee and no suitable alternative exists.
- For most substances (mainly heavy metals e.g. nickel) limits have been reduced in such a way that only traces that are compatible with good manufacturing practice will be allowed. These limits can be updated in order to take into account the development of scientific knowledge. e.g. reactions due to contact to



dermatitis by hexavalent chromium will be reduced.

Nevertheless, for 5 elements (antimony, arsenic, barium, lead, and mercury) the new Directive results in increased migration limits. Some EU Member States like Germany have asked a revision of the new toys' safety rules to take into account children's vulnerability.

- **55 allergenic fragrances** are completely forbidden, if they have a strong allergenic potential, and 11 others have to be labelled on the toy if they are potentially allergenic for some consumers. The situation has largely improved compared to the former EU Toy Safety Directive but more allergenic fragrances would need to be covered to prevent any sensitization of children being in contact with toys.
- Despite a growing body of scientific evidence on their effects on developing organisms, substances known or suspected to act as endocrine disrupters are not covered by the new Toy Safety Directive.

### *Enhanced safety requirements to prevent choking risks*

Technological developments in the toy market raised new issues related to the safety of toys and raised consumer concerns. In order to take into account these developments certain safety requirements have been enhanced.

- Rules on toys and their parts to prevent children from **choking or suffocating** are strengthened, inter alia to deal with the new risk of toys such as those with suction cups or a toy trumpet can no longer have small parts at all.
- **Toys in or co-mingled with food** always need to be in a separate packaging in order to avoid the potential risk of choking due to the association of toys and food creating confusion for consumers between the food and the toy.
- **Toys which are firmly attached to a food product** at the moment of consumption and which require the food to be consumed before getting access to the toy are prohibited.

Legal acts and requirements for toy safety from chemicals hazards in EU and in Balkan countries are described in Annex 2.

In order to reduce the risks of using toys, toys must be accompanied by appropriate clearly visible warnings and written warnings.

### *Warnings on toys*

The new directive promotes safe conditions for using toys by enhancing the provisions on warnings which should accompany the toy.

- In order to prevent accidents **warnings need to be marked on toys** in a clearly visible, easily legible manner in a language easily understood by consumers.
- In order to prevent the misuse of warnings and circumvent the applicable safety requirements, **warnings that contradict the intended use of the toy** are not allowed. For example, the warning "not suitable for children under 36 months" cannot be affixed on toys clearly intended for this age group.
- Toys contained in food or co-mingled with food shall bear the warning: "Toy inside; Adult supervision recommended".

Detailed rules for labelling of toys in EU and in Balkan countries are described in Annex 3.

### 4.3. Choosing safe toys and child products

Choosing health and environmentally friendly toys and child products is not easy. Given the widespread application of hazardous chemicals in toys and everyday child products and the lack of knowledge on many chemicals on the market, there is no easy recipe for shopping safely. Following you can find information on substances which can be found in toys and child products. Please note that while this chapter gives many examples it does not give a complete overview of all toxic chemicals in these products.

**Table 1: Summary of possible health effects for a child deriving from chemicals**

Chemicals group	Found in	Likely effects on child health
Alkylphenols Octylphenol Nonylphenol		<ul style="list-style-type: none"> <li>Developmental &amp; reproductive disorders</li> <li>Immune disorders</li> </ul>
Bisphenol A	<ul style="list-style-type: none"> <li>Baby feeding bottles</li> <li>Nail polish</li> <li>Water bottles</li> </ul>	<ul style="list-style-type: none"> <li>Developmental &amp; reproductive disorders</li> <li>Immune disorders</li> </ul>
Brominated flame retardants PBDEs TBBP-A HBCD	<ul style="list-style-type: none"> <li>Electric equipment</li> <li>Toys</li> <li>Furniture and carpets</li> <li>Building materials</li> <li>Textiles</li> </ul>	<ul style="list-style-type: none"> <li>Developmental &amp; reproductive disorders</li> <li>Nervous system disorders</li> <li>Cancers</li> <li>Accumulates in the environment</li> </ul>
Organotins Dibutyltin Tributyltin Triphenyltin	<ul style="list-style-type: none"> <li>Textiles,</li> <li>Paints</li> <li>Plastic</li> <li>Diapers</li> <li>Bathing toys</li> <li>Earplugs</li> <li>Vinyl carpets</li> </ul>	<ul style="list-style-type: none"> <li>Developmental &amp; reproductive disorders</li> <li>Immune disorders</li> <li>Cancers</li> </ul>
Phthalates: Diethylhexylphthalat (DEHP) Diisononylphthalat (DINP) Diisodecylphthalat (DIDP) Butylbenzylphthalat (BBP) Dibutylphthalat (DBP)	<ul style="list-style-type: none"> <li>Children's toys</li> <li>Cosmetics &amp; perfumes</li> <li>Personal care products</li> <li>Flooring, carpets, furniture</li> <li>Textiles, footwear</li> <li>Other products made of soft plastics</li> </ul>	<ul style="list-style-type: none"> <li>Developmental &amp; reproductive disorders</li> <li>Cancers</li> </ul>
Artificial musks Musk xylene Musk ketone AHTN HHCB	<ul style="list-style-type: none"> <li>Textiles</li> <li>Cosmetic</li> <li>Toy</li> <li>Cleaning</li> <li>Air fresher</li> </ul>	<ul style="list-style-type: none"> <li>Developmental &amp; reproductive disorders</li> <li>Cancers</li> </ul>
Chlorinated paraffins	<ul style="list-style-type: none"> <li>Adult fat</li> </ul>	<ul style="list-style-type: none"> <li>Cancers</li> </ul>
Azo dyes	<ul style="list-style-type: none"> <li>Textiles</li> <li>Leather</li> <li>Paper</li> <li>Shoes</li> <li>Paint products</li> </ul>	<ul style="list-style-type: none"> <li>Carcinogenic risk</li> </ul>
Formaldehyde	<ul style="list-style-type: none"> <li>Preservative used in food, cosmetics, textiles, drawing materials, painting among others</li> <li>In textiles the substance is used to obtain an anti-wrinkle effect or to bind textile print to the clothes</li> <li>Disinfection</li> </ul>	<ul style="list-style-type: none"> <li>Acute human toxic at high dose-levels</li> <li>Can cause allergic reactions</li> <li>Under suspicion for having carcinogenic effects</li> </ul>
Organic solvents	<ul style="list-style-type: none"> <li>Cleaning, polishing fluids</li> <li>Paints</li> </ul>	<ul style="list-style-type: none"> <li>Skin- or eye- irritation</li> <li>Respiratory problems</li> <li>Damage to liver, kidneys, heart, blood vessels, bone marrow, nervous system</li> <li>Narcotic effects</li> <li>Unconsciousness or lethal effect</li> </ul>

Source: Dorey CN, *Chemical Legacy*, 2003. Danish Consumer Council 2004 and <http://www.miljoeogsundhed.dk/default.aspx?node=4922>

### What can be done to reduce the impact of chemicals and handle toys safely – tips for consumers:

- **Avoid:**
  - Polycarbonate-plastic baby feeding bottles. The vast majority of plastic feeding bottles are made from polycarbonate which contains bisphenol A, a hormone disrupting chemical that can leach into the liquid inside; Polycarbonate can be identified by looking on the packaging for PC7 or looking inside the recycling triangle for the number 7;
  - PVC toys – look for a number 3 in a triangle printed on the products label which shows if the product is made of PVC;
  - Using old and worn plastic baby bottles;
  - Using dummies and PVC toys that are more than two years old – they may contain phthalates, which are now banned in newer dummies and children’s plastic toys;
  - Painting or stripping old paint which emit fumes, when you’re pregnant.
- **When choosing a toy:**
  - Always buy toys from trustworthy shops and online outlets. They take care about the toys they sell and will usually accept returns. Rogue traders, however, tend to ignore health and safety needs and may also deal in fake toys. Carefully check toys purchased online, toys given to children as gifts, and toys bought second-hand.
  - Read all warnings and instructions. Be aware of age and safety recommendations – take them seriously. *Never buy toys that do not have the CE mark displayed on the toy or its packaging.* Although the CE mark is not meant as consumer guidance, it is a commitment from the toy maker that the toy complies with all EU safety rules, which are amongst the strictest in the world.
  - Choose toys suitable for the child’s age, abilities and skill level. Toys that are not meant for a child’s specific age group may injure the child. Be sure to follow the age recommendation – particularly the 0 to 3 symbol (see right) and the words ‘not suitable for children under 36 months’ accompanied by the indication of the hazard.
  - Do not buy toys with small detachable parts for children under 3 years of age. As these children tend to put toys in their mouths and they may choke on small parts.
  - Buy non-flexible plastic or wooden toys as these may contain phthalates what are hazardous to children health.
- **After buying a toy:**
  - Follow carefully the instructions for proper toy assembly and use. Keep the instructions and information that are packaged with the toy in a safe place.
  - Keep an eye on children as they play. Make sure that all toys are played with as intended and are suitable for the age and abilities of the child. With certain toys – such as scooters, roller skates and bikes – helmets and other safety gear should always be worn.
  - Check toys from time to time. For breakage or wear that could cause injury and affect the health and safety of the child. Remove broken toys immediately.
  - Remove all packaging and always keep the instructions. Make sure children do not play with plastic packaging as there could be a risk of suffocation.
  - Teach your children to put away their toys to avoid accidents. Don’t leave toys out on the stairs or on the floor in busy areas of the home.
  - Always report a safety problem with a toy to the manufacturer or the retailer where you bought it.
- Check the EU rapid alert system’s website (RAPEX) <http://ec.europa.eu/rapex>. This gives details of dangerous products taken off the market in your country, including toys.
- If you have any queries about the toy safety always ask the manufacturer, retailer or appropriate public authority. According to REACH regulation, upon consumer request, retailers have a 45-day period to inform the consumer on the presence in an article, in a quantity above of 0,1% (w/w), of substances listed under the so-called “Candidate List to Annex XIV”, i.e. substances of very high concern. The information must be sufficient to allow safe use of the article, and must contain as a minimum the name of the substance. In 2010, WECF participated to the report “Fight to know” which aimed at testing the reality of said right at EU level. Results can be downloaded at: <http://www.eeb.org/EEB/?LinkServID=8BBC1DF8-C9C7-8B93-CA5F42033F11A3AD>.

#### 4.4. Situation regarding toys safety in Balkan countries

In the frame of the current project “**Product and Chemical Safety in the Balkans** – civil society cooperation on EU acquis and values for consumer and corporate responsibility” project partners needed to carry out an inventory of problems and challenges in the Balkan countries regard toys safety. Further on the results of the inventory are described according to the country.

#### 4.4.1. Inventory results in Albania

In the frame of the project organisation Women's Movement for Integral Development (LGZHI) in collaboration with responsible state institutions in Albania prepared a questionnaire which goal was to measure level of awareness of Albanian consumer's regard safe toys.

Questions were asked from 40 buyers after they have left toy stores. Selection was random. Based on given answers it can be made conclusion that information on material and contents of toys is insufficient, even for traders, public authorities and consumers.

Overview about the questions and replies are described below:

- Noticing answers to question **'Do you choose toys based on their brand or on their appearances or functioning'** (75% - brand; 20% - not brand, functioning; 5% - not interested) it could be said the Albanian consumer is selecting toys by looking, touching or identifying material of the toy (wood or plastic).
- Lack of information regarding toys and the risks they present is clearly described from the next answers **'Are you are aware of signs certifying toys' safety'** (16% - yes; 80% - no; 4% - not interested). It reveals the fact that even though toys have certification related to production standards, only a few people can "translate" it to risk for children.
- The idea of a disoriented consumer, such as not knowing what to chose, also is revealed in answers to questions **'Are you ever heard of toys made of hazardous materials'** (59% - yes; 40% - no; 1% - not interested) and **'Have you ever bought such toys'** (18% - yes; 80% - no; 2% - not interested), where only a few responders do have information regard hazardous toys in the market. Desire for receiving such information is still strong. Buying hazardous or non hazardous toys are left to coincidence since there is a huge lack on information regard content and/or signs of safety.
- Referring to question **'Have you ever heard that responsible authorities have blocked marketing of some hazardous toys'** (38% - yes; 62% - no) and question **'If you have information regard hazardous toys, have you been noticing that information when choosing it'** (63% - yes; 36,5% - no; 0,5% - not interested), it could be concluded that Albanian consumers tend to be careful only when getting information on toys safety, but they do not ask for it.
- The idea that Albanian consumers do not search for information and have the tendency of getting random information, is also noticed in question **'Do you know which competent authority controls toys' safety and market'** (18% - yes, 70% - no; 2% - not interested). So majority of the questioned consumers does not know where to report about hazardous toy that may harm their child.

Full report on Albanian inventory is attached in Annex 6.

#### 4.4.2. Inventory results in Macedonia

Main problems with safety of toys in Macedonia are described following:

- Toys bought in Macedonia can contain lead and a number of other highly toxic chemicals or allergens. The inspection of imported toys, which make up about 90% of the market, is very random, and to this date no common labelling exists that allows parents to buy toys responsibly.
- Macedonia has a "consumer law" and "Law for general safety products". The laws are quite general and enforcement is not ensured. There seem to be no sub-regulations limiting hazardous chemicals in consumer products, comparable to for example the EU toy safety or cosmetics directives.
- According to the "consumer law" all consumer products that come into Macedonia can be subject to testing, but many products enter the country uncontrolled and many are sold on street markets. The inspectorate for health protection has done some sample testing and found imported toys from Asia which contained cadmium.
- In Macedonia, general health statistics are based on regular collecting of mortality and morbidity data as well as data for hospital services, utilization and resources. Unfortunately, the data from regular health statistics are not suitable for use in identification of chemical related diseases and conditions.
- The Ministries of Economy, Health Care, Labour, and Social Affairs have responsibility for the environmentally sound management of toxic chemicals. In addition, the Agency for Labour Medicine and the Ministries of Agriculture, Forestry and Water Management; and Urban Planning, Construction and Environment play a role in this issue area. Inter-ministerial cooperation on product and chemical safety is however limited.
- The team of researchers found around 20 toys from RAPEX list in the stores in Macedonia. In the shops are freely sold toys manufactured in the Far East, and which may seriously endanger life and health of children. One reason is the non-harmonized legislation, namely that which applies to European Union countries, according to the law, does not have validity in Macedonia. Therefore, in contrast to European countries that has rigorous inspections and quality checks and trying to control the huge import of toxic toys, in Macedonia that is almost mission impossible.

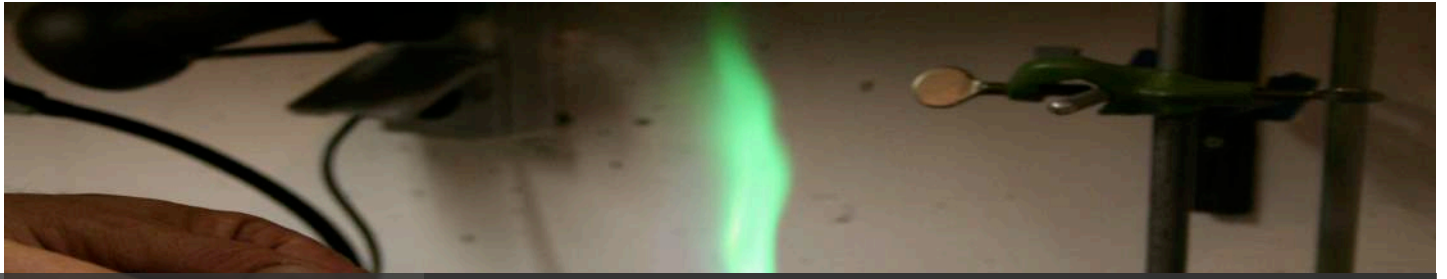
Full report on Macedonian inventory is attached in Annex 7.

#### 4.4.3 Inventory Results in Serbia

In Serbia the situation regard toys safety was identified by expert research. During the research following problems with safety of toys in Serbia were identified:

- Manufacturers are usually only interested in profits and often attempt to reveal only some toxic substances;
- Manufacturers and sellers use legal loopholes, lack of some quality standards and false advertising that flood the market with products of “suspicious” quality.
- Sales of toys and other products in small buildings of Chinese and other producers in countries in transition. Either the producers themselves or their distributors do not have enough knowledge and skilled personnel, necessary to ensure the safety of toys produced.
- Lack of regular and thorough quality control of toys that are sold through exchange. In many cases, the national supervisory authorities rely on the documentation of the importer.
- Expert assessment of toys takes place only at the request of manufacturers, sellers and / or consumers.
- Toys are mostly imported in small batches of different distribution companies which often manage to avoid the certification procedure.
- Low level of knowledge among people about the potential risks to children’s health.

Full report on Serbian inventory is attached in Annex 8.



## Market surveillance system regarding toys

There are some debates on the definition of Market Surveillance. Related to the scope of this document, we accept to use this definition: 'market surveillance' shall mean the activities carried out and measures taken by public authorities to ensure that products comply with the requirements set out in the relevant legislation and do not endanger health, safety or any other aspect of public interest protection.

Market surveillance is more and more recognized as an essential step in the process of putting a product on the market, i.e. compliance with essential requirements must be checked after the product was put on the market to ensure compliance with the technical regulations. One of the main challenges confronting market surveillance are the increased consumer products that are being manufactured in developing economies, a pertinent example being toys. Most of the toys to be found on the developed countries markets are coming from developing economy countries. Also traceability of products becomes an important issue with a longer supply chain that reaches back to the manufacturing countries. The issue of traceability requires closer cooperation with customs and market surveillance authorities for jurisdiction applicable to the manufacturing countries. This would imply closer international cooperation.

The responsibility for market surveillance rests with the authorities. All countries, and UNECE (United Nations Economic Commission for Europe) countries in particular, have, in most cases, a legal duty to enforce the legal framework for which they were designed as Market Surveillance Authority (MSA). The national MSA's need to have adequate resources at their disposal to ensure that they can deal with the volume of imported products, the needed dangerous product notifications' and with the technical complexity of the regulations and the standards.

A country has to maintain a market surveillance system due to two reasons:

1. Illegal and unsafe products should not be allowed to be put on and remain on the market.
2. Fair market conditions should prevail. Suppliers which follow the rules and bear the administrative costs and delays due to regulations should not be disadvantaged compared to those who do not comply to the rules.

### 5.1. Toys Safety

The European toy industry comprises over 25% of the total world toy market. The toy industry is highly international and is one of the most dynamic business sectors in Europe. Around 80% of the sector is composed of small and medium sized enterprises (SMEs) which have less than 50 employees. More facts and figures are described in Annex 4.

On 30 June 2009 the new Toy Safety Directive (2009/48/EC) was published, giving consumers assurance that toys sold in the EU fulfil the highest safety requirements world-wide, especially those relating to the use of chemical substances. The Directive only sets the essential safety requirements that toys placed on the market in the EU have to fulfil. All toys marketed in the EU must carry a CE conformity marking, which is the manufacturer's declaration that the toy satisfies all essential safety requirements (the CE marking now needs to be affixed also on its packaging if the mark is not visible from outside the packaging). Before obtaining the CE mark a manufacturer has to carry out a safety and conformity assessment. The manufacturer has to establish more comprehensive technical documentation for all his/her products, including information on chemicals used and he has to ensure traceability.

Manufacturers can choose between two modules for conformity assessment:

1. Self-verification: The manufacturer applies the harmonized standards published in the Official Journal covering all relevant safety

requirements and puts in place an internal production control procedure. He draws up a technical documentation and the EC declaration of conformity. Then, he affixes the CE marking, his name and address and an identification element (traceability) before placing the toy on the market.

2. Third party verification or certification: The manufacturer submits the model of the toy to EC-type examination carried out by a notified body and puts in place the conformity to type procedure based on internal production control. The notified body issues an EC type examination certificate stating that the toy complies with the essential requirements of the Toy Safety Directive. The manufacturer draws up a technical documentation and the EC declaration of conformity. Then, he affixes the CE marking, his name and address and an identification element (traceability) before placing the toy on the market

Importers must check whether manufacturers have carried out conformity assessment of toys correctly and if necessary must carry out random tests themselves. If toy manufacturers/importers/distributors do not fulfil the safety requirements of the Directive, Member States can impose penalties.

Toys that comply with Europe's stringent toy safety requirements and other EU legislation are safe but market surveillance must be stepped up to ensure that rogue traders cannot put inferior products on the market. It is imperative to concentrate on the points of entry into the EU as it is difficult to detect non-compliant or unsafe toys once they are on the market. Increased market surveillance would also help to combat the problems of counterfeiting and parasitic copying, which are of particular concern to the toy sector and consumers alike, as counterfeit products can compromise the safety of children.

## 5.2. Market surveillance systems in EU countries

1. Member States have to ensure that market surveillance authorities perform adequate checks at the EU external borders and within the EU including visits to premises of all economic operators to make sure that dangerous toys are immediately prohibited or withdrawn.
2. Market surveillance authorities can destroy toys presenting a serious risk.
3. Member States have to investigate infringements and to take action to bring about their cessation, in order to ensure only safe toys are placed on the EU market.
4. Cooperation with foreign partners, in particular China, is also vital for toy safety. The Commission provided and will continue to provide training to manufacturers in China.

Market surveillance systems in different EU MS are described in Annex 5.

## 5.3. Market surveillance systems in Balkan countries

### 5.3.1. Market surveillance in Albania

As defined by Article 75 of the framework of the Stabilization Association Agreement (SAA) the objective is to use the technical rules of the European Community Standards and the conformity assessment procedures. The political objective of the national strategy for the consumers' protection and the market surveillance is to guarantee the circulation of only safe products and services in the market.

The laws that do not transpose the community acts and their level of approximation are as follows:

- Law No. 9097, dated 3.7.2003 "On conformity assessment".
- DCM No. 723 dated 5.11.2004 "On Basic Rules and Procedures for the Functioning of the Authorised Body for the Completion of Conformity Assessments".
- Decision No. 888, date 19.12.2007 for approval of technical rules of "Essential requirements and evaluation of conformity of Toys".
- Law No. 9779, dated 16.7.2007 GENERAL SAFETY, essential requirements and conformity assessment of non-food products.

Institutional framework regard market surveillance is following:

- The Ministry of Economy, Trade and Energy (METE) is the responsible institution to draft the legislation and to perform market surveillance.
- The Market Surveillance Directorate (MSD) is responsible to draft the technical legislation (New and Old Approach) which falls under the activity of Ministry of Economy, Trade and Energy.
- The Central Technical Inspectorate (CTI) is responsible for the monitoring of the observation of the rules, which guarantee the safety of pressure equipment and installations at work in the activity of legal and natural persons. Until the establishment of the structure for market surveillance the CTI is responsible for the implementation of the law "On general safety, the main requirements and the assessment of the products' conformity", as regards the tasks related to market surveillance for the industrial products (non food).

Table 2: Market Surveillance in Albania: legislation, authorities

Topic	Legislation	Authority responsible
<b>General Framework Laws</b>		
Conformity Assessment	<a href="#">Law No. 9097</a> , on conformity assessment	Ministry of Industry and Energy
	<a href="#">Decision No. 723, 2004</a> , on the basic procedures and rules for functioning of organism authorized for performing the conformity assessment	Ministry of Industry and Energy
Standardisation	<a href="#">Law No. 8464</a> , dated 11.03.1999, on standardization (amended by law on accreditation)	Ministry of Industry and Energy
	<a href="#">Law No. 9253</a> , dated 08.07.2004, on some changes in the law on standardization	Ministry of Industry and Energy
	<a href="#">Decision No. 382</a> , dated 23.7.2002, for the exchange of information in the area of standards and technical regulations	Ministry of Industry and Energy
Accreditation	<a href="#">Law No. 9024</a> , dated 06.03.2003, on accreditation of testing, calibration laboratories, certification and inspection bodies	Ministry of Economy
<b>Horizontal (overall) consumer law</b>		
Consumer contracts, rights, general product safety, structures	<a href="#">Law No. 9135</a> , date 11.9.2003, on consumer protection	Ministry of Economy
Consumer contracts, guaranty	<a href="#">Law No. 7850</a> , 1994, Civil Code	Ministry of Justice
<b>Product laws</b>		
Toys	<a href="#">Order No. 43</a> , date 24.08.2000, on the technical regulations concerning the production and trade of toys	Ministry of Economy, Ministry of Industry and Energy
Chemicals: Classification, general, dangerous products	<a href="#">Law No. 9108</a> , date 17.07.2003, on chemical substances and preparations	Ministry of Industry and Energy, Ministry of Defence, Ministry of Environment, Ministry of Health

### 5.3.2. Market surveillance in Macedonia

In Macedonia exist NATIONAL PROGRAM FOR COORDINATION AND TAKING AN EFFECTIVE MEASURES FOR MARKET SURVEILLANCE (2011- 2012). With this National Program is secured the elimination of all barriers that obstruct the free movement of goods and services and fulfilling of conditions taken within the SAA between the Republic of Macedonia and the European Union such as:

1. Reduction of the customs duties and quantitative restriction of import and export of goods and all other measures that have equivalent effect;
2. Establishing of internal market without barriers for the free movement of goods and products that are safely placed on the market and making available in use on the market;
3. Realization and protection of the public interest;
4. Strengthening the protection of life and health of people, environment and protection of assets.

The Ministry of Environment (MoE) in consultation with all stakeholders has developed an integral strategy for market surveillance including competition issues. It is developed according to different institutional options:

- a) by a specific and strengthened department within the MoE;
- b) an independent Agency;
- c) a network of entities working in close cooperation and synergy;

Market Surveillance in Macedonia it should enhance policy definition in consultation and participation of all stakeholders. This entails among others:

- (a) review of mechanisms for participation of consumer organizations in policymaking;
- (b) coordination of activities and control of the market regulation effectiveness;
- (c) the setting up of education and capacity –building projects.



### 5.3.3 Market surveillance in Serbia

Serbian Parliament adopted the Law on Market Surveillance, which provides improved control and monitoring system on the market and the implementation of technical regulations in line with EU standards. The law stipulates that products on the market have to meet certain requirements with respect to safety and protection of life and health, consumer, property and the environment, but also the free movement of goods without undue restrictions.

Market surveillance authorities will be able to check the characteristics of the product, and if necessary, to perform physical and laboratory checks from companies that seek the necessary information and documentation.

Market inspectors decide on taking measures to prohibit placing on the market or limit delivery of products and measures of withdrawal from the market. If it turns out that a product is risky, the market surveillance authorities to order that he be destroyed, and to withdraw certain goods from the market when it is determined that its use is a risk and to inform the competent Ministry, on the measures taken informs European Commission. Market surveillance authorities shall promptly inform users on the entire territory of Serbia on the potential risks of using the product.

Costs of compliance verification and testing of the product bears the undertaking, if it is determined that the product does not comply with the prescribed requirements. Control of products entering the market in Serbia implemented by the customs authority, in cooperation with the market surveillance. The customs authority shall suspend the proceedings if it is found that the product presents a risk to health, safety and the environment, or if there is no proper documentation.

Coordination of market surveillance shall be performed by the Security Council of products that will form the Serbian government within two months from the date of entry into force of the law. The law obliges the government to issue a general market surveillance program to 31 December 2012 for a period of two years, while the market surveillance authorities are obliged to make annual programs within three months after the law took effect.

The Assembly adopted the Law on Health Care consumer goods which stipulates the conditions that these products would have to meet. This also refers to the toys and items for children and infants, cosmetic products and their packaging, the use of items that come in contact with the skin or mucous membrane, for items decorating the face and body piercing jewelry and imitation. The government also adopted amendments to the law on chemicals and biocides to provide oversight to the implementation of laws and regulations that regulate the area, in addition to the Inspector for Environmental Protection and market inspectors, sanitary inspectors perform.



## Role of NGOs in risk reduction from use of consumer products

The main roles of NGOs - to enhance risk reduction in the use of consumer products, to change consumer behaviour regarding their choice of products as well as to take part in legislation development - are described in this chapter. The tools and measures that might be used to achieve these goals are introduced below. Strategies for providing information, topics that are good for campaigning (e.g., toys, but not industrial chemicals), language to use (not too difficult, examples, close to every-day experience) are presented in the chapter as well.

Another part of the chapter stresses that NGOs can act in 'enforcing' different legislation related to consumer rights (general or chemicals-specific). This could be done by carrying out testing campaigns or 'blacklisting' dangerous products or their producers, among others.

There are a lot of different topics of interest for consumers, e.g., rights to exchange a product in a shop when it does not have the right quality or how to get information about food bought on a daily basis in the nearby shop. Some of the reasons why it is important for NGOs to work on chemicals' topics are the following:

Everyone from babies to older people is surrounded by chemicals, which could be hazardous, or by articles, which could contain substances hazardous to human health and the environment.

Again and again, people intoxicate themselves or suffer from allergies induced by chemicals.

The general knowledge about safe handling of chemicals is not very high. Product information is in many cases too poor to compensate for that.

The current system on chemicals control in the Balkan countries shows that there is a need to have more data about chemicals used. Non-governmental organisations represent the voice of consumers in the development of new legislation process and can put pressure on the industry.

Therefore, NGOs have two main roles in work with chemicals. The first is to raise public awareness on the issue. This can be done by researching hazardous products and informing about risks posed to human beings and the environment, and by educating the

general public on how to avoid these risks. NGOs can also point out non-compliance with regard to chemicals, e.g., improperly labelled chemicals, and draw the attention of the general public to this through campaigns.

The second role is to participate in policy development by lobbying and representing the interests of consumers and the environment.

### 6.1. Ways to inform the general public

NGOs can use a lot of tools and methods to provide and disseminate information on chemicals to the general public. It is not the role of NGOs to provide specific information on single products (this is the responsibility of the producer of a product). They rather should point out which dangerous substances are found in which products and which types of risks may be associated with that. This is the core of many campaigns that focus on concrete product groups. This shall encourage consumers to carefully check the information provided and to ask for more information from the producers, if it is insufficient. Frequently, 'blacklists' for products, brand names or producer companies are also published to promote boycotts of the most dangerous products within their group.

The main aim of informing the public about dangerous chemicals in consumer products is to change the purchasing behavior. There are different ways of how consumers can be informed, and those include publications and brochures, TV or radio, specific campaign leaflets or publications, eco labels on products or the Internet.

The factual information provided to the people should be as simple as possible, illustrated with different examples from daily life. When talking about chemicals, it is important to bear in mind that most consumers are not familiar with the topic and have little background knowledge on chemical hazards.

Organisations preparing a campaign should also be aware that not all topics are equally useful for campaigning. The 'best' topics are related to the direct use of goods that contain chemicals and that may pose a health risk to consumers.

The decision on the tool to disseminate information depends on the target group of the campaign. The audience may be the general public, some special society groups - pupils, clerks, state officials, politicians, workers, etc. if an organisation wants to communicate with the general public, the following information dissemination methods could be chosen:

- public meetings / hearings;
- public forums or panel discussions;
- written or audio / visual materials;
- talk shows on TV or Internet chat rooms;
- exhibitions;
- 'inspection' tours to facilities (open houses, special events in-house, etc.).

Written material is still the most popular form of a large-scale communication with different audiences. The design of the material should be reflective of the needs, concerns, and the level of knowledge of the intended audience. In addition to the written information, new channels of multimedia presentations (videos, the web) may also be used as means of communication with consumers. Visually stimulating design and easily understood information, supported with illustrative photos, makes written materials more attractive to the readers.

A press release is a written communication between the risk communicator and the media. Most of the time, press releases are simultaneously distributed to all the relevant media, and are quite efficient for being able to reach a large audience. Press releases can also be specially designed for different media types. Press conferences is the second most popular form of communication with the media.

Various NGOs have launched campaigns on chemicals, which included different tools for transferring the message to consumers. Campaigns usually address a specific problem. Many different tools are combined for a campaign to be successful, to be more visible and perceptible for a variety of target groups. Campaigning may also indirectly enhance the enforcement of legislation, as consumers (as well as authorities and companies!) are better informed and pay more attention to what types of chemicals and articles they use. If consumers would demand safe products and better labels informing about the chemicals content, this would be the driving force for the industry change and could even be used as marketing argument for progressive companies.

For example campaigns like a The European Consumers' Organisation (BEUC) campaign - "Our daily cocktail of chemicals"<sup>1</sup>, which shows which chemicals are used at home. Other campaign examples are the Greenpeace research on Disney childrenswear<sup>1</sup>, investigation of phthalates used in cosmetics - "Pretty nasty - phthalates in European

cosmetic products", DetoX campaign on REACH by the WWF<sup>1</sup>, or a campaign on hair dyes.

Eco-labels is one of the ways for producers to communicate the environmental and health soundness of their products to consumers. The labels are granted to those products, which have a health or environmental benefit in comparison to other products of the same type. Eco-labels make it easier for people who wish to buy healthier and safer products to identify them. As it is a widely accepted tool to influence consumers' product choices, NGOs play a role in increasing the recognizability of the labels among the general public.

Developing ecolabels for toys or any other product categories is a complex process which involves various stakeholders, including some manufacturers, laboratory experts, standardization bodies, national agencies in charge of environment protection.

Since toys are a very complex product category including a wide range of products made of various materials, developing criteria may be significantly more difficult than for other product categories which do not trigger similar complexity (shoes, furniture, etc.).

The Swan<sup>1</sup> is the official Nordic eco-label, introduced by the Nordic Council of Ministers.

The Swan's mission is to contribute to reducing the consumer burden on the environment. The eco-label can thereby be used to guide consumers and purchasers in their desire to shop with a "green" conscience, and thus contribute to a better society.

Nordic Ecolabelled toy fulfils the Nordic Ecolabel's strict health and environmental requirements to ingoing materials, surface treatment and the production of both raw materials and end product. The criteria give requirements to certified wooden raw materials, environmental- and harmful substances and satisfactory durability.

The product needs to be of high quality and may not contain substances classified as carcinogenic, mutagenic or toxic to reproduction (including category 3 - where there are suspicions of CMR properties but no scientific evidence).

Picture 2: Nordic ecolabel – the Swan

Picture 3: German Ecolabel – The Blue Angel

## 6.2. Examples from WECF informing the public and collecting information

To get the messages and information across about toys and to communicate the need to save children from hazardous substances in toys WECF developed several tools taking into account diverse target groups as politics, consumers, retailers and different ambitions like lobbying, awareness raising or informing consumers. Since 2005 WECF has developed a website and workshops targeting parents of young children to promote safe and healthy indoor environments for children ([www.projectnesting.org](http://www.projectnesting.org)). Toys are an important issue within the WECF nesting project and campaign. Besides this WECF also developed a consumer guide for toys, which was translated already in many languages, and conducted several awareness raising events, like public toys testing.

### 6.2.1. Policy

On policy level WECF wants to inform political decision makers about new scientific evidence and other facts, as well as their position on toys safety. The aim is to persuade them to take policy measures in WECF line, which could be in respect to a vote e.g. in Parliament, setting certain issues on the political agenda, give funds to research or projects which could improve the status quo, etc. WECF addresses governments on local and national level, as well as on EU level and in international policy processes, such as the Strategic Approach on International Chemicals Management (SAICM). Common tools to advocate for NGO positions are the development of own position papers, which are distributed to decision makers, other stakeholders and media, awareness raising and information events aiming at politicians, like the toys testing in the European Parliament, where parliamentarians could bring their own toys for testing, but also conferences and round tables are good tools to present positions and facts. Media work is a good tool to put pressure on policy makers, so it is good to have good contacts to friendly journalists. However, communicating chemical issues is very difficult, since it does not often attract media, due to its complexity.

### 6.2.2. Awareness Raising

One of the main goals of WECF activities on toys safety is to raise awareness on this issue in society as well as among politicians, producers and retailers. WECF organised and still organises public toys tests in city centres for example in Munich, Paris and Amsterdam in the run-up to Christmas. The aim is to raise awareness of the potential hazards posed by chemicals in children's toys. Parents were invited to bring toys along which are tested on formaldehyde or brominated flame retardants or other substances, substances for which easy-to-do testing methods are available. These campaigns always were covered by main TV-Channels and newspapers and created a big publicity, resulting in an increased awareness of parents.

To raise awareness worldwide in 2008 WECF co-founded the Safe Toys Coalition, which aims to protect children's health by striving for a world free of toxic and unsafe toys. The coalition members address decision makers, producers, retailers and the public at national, regional and international level and help consumers to make informed decisions about the products they buy. The coalition has set out the following aims for the first year of the campaign: To promote their mission at events on national and international level (such as the international toy fair in Nuremberg, the SAICM working group on chemicals in products)

- To call on national governments for safer, toxic free toys,
- To establish a joint work plan of activities,
- To publish and disseminate the consumer guide on safe toys (already available in 13 languages on the WECF site).

The Safe Toys Coalition was founded by the following NGOs and many others from around the world joined: Eco Accord, Baltic Environmental Forum, Arnika, Clean up Greece, Journalists for human rights, Ekoloji Tarazlig, WECF. The coalition has its own website ([www.safetoyscoalition.org](http://www.safetoyscoalition.org)).

To reach consumers about toys WECF published a Toys Guide which provides tips on choosing toxic-free toys. The brochure provides concise information about the most hazardous substances found in toy and gives concrete tips in how consumers can play it safe when buying toys. The Guide already is available in 13 languages and can be downloaded from the WECF website (<http://www.safetoyscoalition.org/p/publications.html>).

### 6.2.3. Information and Education

There are various forms to inform and educate, like brochures, flyers, websites, conferences, workshops media work, but also new social media tools like facebook, twitter and apps. One important way to get the word spread, especially to key actors is the simple face to face conversation, which could provide you in the end with valuable information and open the door to other interesting contacts.

It is key to distinct between your target groups. Whom do you want to address? What kind of language does your target audience understand? What is interesting for them? And what is the agenda of your target group? Taking this into account, it is clear that parents are interested in other information than retailers, producers or politicians.

### 6.2.4. Events – conferences, workshops, trainings, seminars

In November 2010, WECF France organized a toys symposium on chemicals of concern in toys, gathering toys manufacturers and retailers, scientists, international and European decision-makers, NGOs, consumer organizations to explore solutions towards safe toys in a global market: several front-running companies were invited to express their conception of toys safety and to present examples of substitution of hazardous chemicals in toys. The conference resulted in positive discussions on efficient and innovative solutions to produce toys that would be safe

both for children and the environment.

In October 2010, WECF The Netherlands conducted a toys symposium combined with toys testing in the public. The event attracted many visitors and media attention. For this event we created a Q&A for consumers and journalists, and also presented results of tests of toys bought in The Netherlands, Germany, and France, which were done by a test lab in Germany and in France.

In January 2012, WECF was invited by Michele Rivasi, a member of the European Parliament (MEP), to conduct a toys test at the Parliament. MEPs and journalists could bring their own toys to let them test live at the event, where we informed the audience about our position on the European Toys Safety Directive. The positive effect of such live test is that you can directly involve your audience by testing the toys they brought to the event. However, it is important to also bring your own toys, in case you cannot find anything in the brought ones.

### **6.2.5. Campaigning**

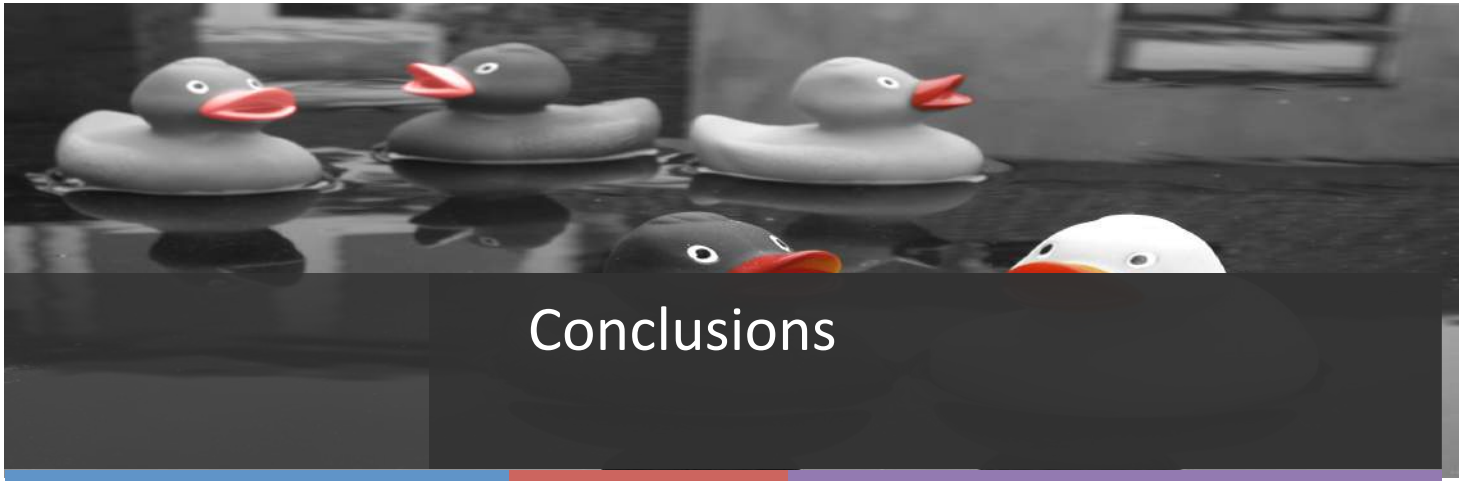
Campaigning is an organized effort which seeks to influence the decision making process. It usually focuses on achieving one single goal, which often influences or triggers other decisions/actions. Greenpeace is one of the most prominent and successful campaigning NGOs. If you want to start a campaign on toys (this applies for many issues) make clear what you try to influence is and what exactly you want to achieve. Map the issue, situation and the key players, and try to find the best entry to achieve your goal. Define clear steps, target groups and messages. You can find more information about successful campaigning at [www.campaignstrategy.org](http://www.campaignstrategy.org)

### **6.2.6. Testing**

A very effective way of getting results, which are very credible and reliable, is testing for chemicals in consumer goods. If a certain product is not labelled and its content not listed on the product, for example toys or air fresheners, the only sure way of getting the information of what the products contain is through laboratory testing. It is also possible to contact the producer/importer but you cannot be sure that you get the exact results. Laboratory testing will give you the exact information and can rarely be disputed by the producer/importer. You are usually guaranteed good result, but be aware of that laboratory test are often expensive.

How to do it:

- Define your target group. Is it the total population, the families, the kids, the elderly, the politicians, the producers;
- Select a product group in which you suspect that unwanted/illegal chemicals are used for, example toys (phthalates);
- Make an agreement with an accredited laboratory. Have a meeting with the laboratory where you discuss the test (how will they perform the tests, what chemicals are you looking for, in which form would you like the results, can you use their name in future press-releases);
- Buy the products (maybe choose two of each, one for testing and one for picture taking), note down all details about the products (name, where it was bought, importer/producer, price etc.), label the products with numbers, and prepare for sending to the laboratory;
- Have a plan for how you intend to use the results. If you find illegal chemicals you probably have to notify the authorities, have a plan for how you will communicate the results;
- When you receive the results, confront the producers/importers with your findings and give them a chance to comment the findings. Give them maximum one week to respond and make sure you have confidentiality (make sure they do not go public before you do!). Tell them that they can see the results beforehand, but only if they keep the findings confidential;
- When you are ready publish the results.



## Conclusions

- Many different chemical substances, found in consumer products, surround people. Chemical substances are also emitted to the environment; some of them are hazardous and may cause unacceptable risks for human health or the environment.
- Consumers can contribute to risk reduction through responsible use of products. Firstly, only well informed consumers can choose safer products, e.g., containing less hazardous chemical substances, and they can demand safer products from producers, thus influencing the market. Secondly, consumers can protect themselves and the environment if the right safety measures are taken in handling chemicals. Finally, consumers can be a major driving force in requesting policy makers to ensure their rights for safe goods and safe environment in policy development.
- Chemicals-related activities and campaigns of non-governmental organisations in the Balkan countries have been rather scarce if compared with the European non-governmental organisations. The main reasons for this is a lack of chemical competence.

**Abbreviations**

BEUC	The European Consumers' Organisation
CMD	Council of Ministers
CMR	Carcinogenic, mutagenic and reprotoxic chemicals
EC	European Commission
EU	European Union
GHS	Globally Harmonized System for Classification and Labelling of Chemicals
GPSD	General Product Safety Directive
LGZHI	Women's Movement for Integral Development
MEP	European Parliament
MoE	Ministry of Environment
MS	Member State
MSA	Market Surveillance Authority
NGO	Non-governmental organisation
PCB	Polychlorinated biphenyls
PVC	Polyvinyl chloride
RAPEX	EU alert system on dangerous products
REACH	EU Regulation on Registration, Evaluation, Authorisation and Restriction of Chemicals
SAICM	Strategic Approach on International Chemicals Management
SME	Small and medium sized enterprises
TSD	Toy Safety Directive
WECF	Women in Europe for a Common Future
WWF	World Wildlife Fund



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**WECF** | Women in Europe for a Common Future  
Women International for a Common Future | **WICF**