

## New European standard for toy safety: CEN published EN 71-3:2019 ‘Safety of toys - Part 3: Migration of certain elements’

### Background

In connection with the amendment of the **EU Toy Safety Directive 2009/48/EC** on 16 May 2018 -- for the tightening of the migration limit for chromium (VI) in Cat III scrapped-off toy materials, our previous *Newsletter 2017 13 EU Tightened Up Lead Migration Limits* for Toys already mentioned the following:

*Relating to this change in limit, the European harmonized standard EN 71-3 (last version: EN 71-3:2013+A3:2018) has also been revised, and published as EN 71-3:2019 (though not yet listed in the Official Journal under the Toy Directive).*

*Amongst the various significant technical changes that have been made, the revised EN 71-3 has its limit values for Chromium (VI) for material category III adapted to the new legal limit values.*

This newsletter, therefore, is to further elaborate the significance of this new standard – which was published by the CEN on 10<sup>th</sup> April 2019 -- as the more reliable methods for demonstrating the compliance with the aforesaid amended Toy Directive. It is expected that this new standard will be listed in the Official Journal of the European Union (OJEU) soon.

### What's new?

The following table in Annex A of the new standard describes the significant (though not exhaustive) technical changes in this new standard versus the previous versions:

Clause/ Paragraph/ Table/ Figure	Change
3	New terms and definitions for sample and laboratory sample added and terms and definitions on limit of detection, limit of quantification and other material (whether mass coloured or not) removed.
4	In Table 2 the limit value for Chromium (VI) for material category III adapted to <i>new legal limit values*</i> .
6	The list of reagents and apparatus has been revised
7	Sampling and sample preparation have been revised and restructured to improve the user-friendliness of the standard. In particular sieving is no longer required and the corresponding annex with sieve requirements (former Annex C) has been deleted. the dewaxing procedure has been revised.
8	The migration procedure has been revised and more detailed procedures for checking the pH before and after migration has been introduced.
9	The stabilization of the migration solution has been revised. The status of test methods (included in Annex E, Annex F and Annex G) has been changed to normative. Performance requirements concerning the use of modifications to the annexes and alternatives to the specified test methods have been introduced.
10	The calculation has been revised, in particular Chromium (III) is now calculated by subtracting the Chromium (VI) concentration from the total chromium concentration.
11	Data on method performance have been introduced based on the results of test method validation and in particular the results of an interlaboratory comparison.
Annex B	A new informative annex containing information on the method development has been introduced.
Annex C	A new informative annex with estimations of reproducibility has been added.

Annex D	A new annex concerning the use of visual particle size comparison materials has been added.
Annex E	Minor revisions of the test method for general elements have been made.
Annex F	The test method for Chromium (III) and Chromium (VI) has been replaced by a test method for Chromium (VI) which is capable of determining Chromium (VI) at the limit values for all material categories.**
Annex G	The test method for organic tin has been revised.
Annex H	Various rationales have been revised and new rationales concerning sampling and dewaxing have been added.

**NOTE:**

\* **”The new legal limit values”** refer to the new Cr(VI) limits (0.053mg/kg) as described in the amended Toy Directive 2009/48/EC (16 May 2018). Such compliance is to be due on *18 Nov 2019*.

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For more information, please contact our Toys and Children’s Products Department.

**Hong Kong:** [hktcd@stc.group](mailto:hktcd@stc.group)  
**Japan:** [jpo@stc.group](mailto:jpo@stc.group)

**Dongguan:** [dgtd@stc.group](mailto:dgtd@stc.group)  
**U.S.A.:** [usstc@stc.group](mailto:usstc@stc.group)

**Shanghai:** [shtcd@stc.group](mailto:shtcd@stc.group)  
**Germany:** [info@pkm.eu.com](mailto:info@pkm.eu.com)