



HMG Powder Coatings Limited

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The Toys (Safety) Regulations 2011

The use of powder coatings for the decoration of toys and articles for children has been controlled since 1974 in the UK by the requirements of the Toys (Safety) Regulations. The most recent regulations enact the European Toy Safety Directive 2009/48/EC and impose new obligations for toy manufacturers, including:

- Technical documentation
- Production control
- Safety assessments
- An European Community (EC) Declaration of Conformity.

Of particular relevance to powder coatings users are the new chemical requirements as follows:

- Substances classed as carcinogenic, mutagenic or toxic for reproduction (CMR's) are not allowed in toys;
- Nitrosamines are banned in toys for children under 3 years old and in toys intended to be placed in the mouth;
- 55 listed allergenic fragrances are not allowed in toys, and another 11 must be declared if present if concentrations exceed 0.01% by weight;
- 19 elements are restricted, testing now includes 17 different elements with additional determination of Chromium (III) and (VI) and both tin and organic tin.

Chemical requirements within the European Toys Safety Directive are controlled in the UK by the standard EN 71-3:2013; coatings fall into Category III (Scraped-off materials).

Whilst these regulations strictly only apply to toys and articles intended to be sucked or chewed by children, they are often referred to in the context of other health protection issues. Importantly, the regulations, and therefore the standard, apply to the toy or article as placed on the market and NOT the coating supplied by ourselves.

From our experience, we would expect all of our coatings to meet the chemical requirements of EN 71-3:2013, however we strongly recommend that a trial is carried out, using all intended production materials and that the resultant toy or article is tested to establish its compliance with the regulations. In carrying out such trials, all precautions should be taken to avoid the risk of introducing contaminants, which would result in rejection of the product.

It is worth stating that products classed as 'lead-free' or 'no added lead' may not conform to the Toy Regulations; both phrases indicate that no lead or heavy metal containing products have been added to the coating system during manufacture. However, lead or heavy metal impurities could be present in the raw materials used, hence the reason for independent certification.

Should you wish for the coating to be tested against EN 71-3:2013, prior to delivery, we recommend a UKAS accredited laboratory carry out this analysis. If you wish us to organise this testing on your behalf, the cost of testing each batch of coating will be passed on to you. The completion of the analytical testing takes some time and orders for coatings should be placed, allowing sufficient time for the work to be carried out. We will be pleased to advise test times and cost on enquiry.



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