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INTERNATIONAL CONFEDERATION OF INSPECTION AND CERTIFICATION ORGANISATIONS

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## POSITION PAPER

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### The Revision of the “Toy Safety Directive”

*CEOC International position on the revision of Directive 88/378/EEC of 3 May 1988 on the approximation of the laws of the Member States concerning the safety of toys (TSD), so-called “Toy Safety Directive”*

CEOC International welcomes the proposal for a directive of the European Parliament and of the Council on the safety of toys, presented by the European Commission 25 January 2008.

Globalisation of trade flows has led to an annual inflow of about ten thousands of toys in the European Union reaching millions of families and children.

Last year the European Union banned 409 kinds of unsafe toys which implies an increase of 85 % compared to the year before.

CEOC International members involved in the testing of toys estimate that between 10 to 30 % of the tested toys fail to comply with the testing criteria. Considering the fact that this figure only relates to the toys tested on a voluntary basis, it is most likely to presume that the figure would be much higher if all toys would be offered for testing.

CEOC International points out that an increasing number of toys are manufactured outside the European Union under production circumstances that can not be verified and that the burden of safety-proof will therefore shift from the manufacturing company towards the importing, distributing and selling companies to avoid accidents and legal claims afterwards.

CEOC International welcomes the main novelty in the revision being the introduction of specific rules on CMR (carcinogenic, mutagenic, or toxic for reproduction) substances in Toys.

CEOC International also welcomes that the proposal takes into account the detailed rules relating to the CE marking to be placed on the toy or on the packaging where the toy is not visible from outside the packaging. At the same time CEOC International underlines the fact that up until now the CE marking is not a European safety label implying that it cannot replace existing national safety labels.

CEOC International therefore supports the joint position published by BEUC, the European Consumers Organisation and ANEC, the European Association for the Co-ordination of Consumer Representation in Standardisation demanding that Third Party Conformity Assessment should be obligatory for certain categories of toys such as toys for very young children and toys that contain risky components and have proven to cause serious accidents in the past.

CEOC International would also welcome an independent global standard for the safety of toys as recently proposed by the world’s leading toy manufacturers that would improve the safety of toys in a global market.

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