

## Proposed Updates to Safety Standards for Toys and Children's Products

The Government proposes adopting up-to-date safety standards promulgated by the relevant standards institutions for toys and some children's products listed in Schedule 2 ("Schedule 2 products") under the Toys and Children's Products Safety Ordinance (Cap. 424) ("the Ordinance"). We are seeking comments on the proposal.

2. The Ordinance stipulates that a person must not manufacture, import or supply a toy or Schedule 2 product unless it complies with all the applicable requirements contained in any one of the safety standards (international standards or standards adopted by major economies) specified in Schedules 1 and 2 respectively to the Ordinance. We keep in view updates to the standards so as to apply up-to-date, operative versions to products supplied in Hong Kong.

3. It has come to our attention that the specified standards for toys and for five classes of Schedule 2 products have been updated/amended to new versions as follows -

### *Toy Standards –*

- (a) a new part of the International Standard, "ISO 8124-7:2015 Safety of toys — Part 7: Requirements and test methods for finger paints", has been published;
- (b) the existing part of the European Standard "BS EN 71-5:2013" has been updated to "BS EN 71-5:2015";
- (c) a new part of the European Standard, "BS EN 71-13:2014 Safety of Toys — Part 13: Olfactory board games, cosmetic kits and gustative games", has been published; and
- (d) the existing part of the European Standard "BS EN 62115:2005+A11:2012" has been updated to "BS EN 62115:2005+A12:2015".

### *Schedule 2 Product Standards –*

- (a) the existing European Standard (a) "BS EN 747-1:2012" for *bunk beds for domestic use* has been updated to "BS EN 747-1:2012+A1:2015";

- (b) the existing European Standard (b) “BS EN 747-2:2012” for *bunk beds for domestic use* has been updated to “BS EN 747-2:2012+A1:2015”;
- (c) the existing ASTM Standard “ASTM F1004-13” for *child safety barriers for domestic use* has been updated to “ASTM F1004-16b”;
- (d) the existing ASTM Standard “ASTM F404-14a” for *children’s high chairs and multi-purpose high chairs for domestic use* has been updated to “ASTM F404-16a”;
- (e) the existing International Standard (a) “ISO 9221-1:1992” for *children’s high chairs and multi-purpose high chairs for domestic use* has been updated to “ISO 9221-1:2015”;
- (f) the existing International Standard (b) “ISO 9221-2:1992” for *children’s high chairs and multi-purpose high chairs for domestic use* has been updated to “ISO 9221-2:2015”;
- (g) the existing ASTM Standard “ASTM F406-13” for *playpens for domestic use* has been updated to “ASTM F406-15”; and
- (h) the existing ASTM Standard “ASTM F833-13b” for *wheeled child conveyances* has been updated to “ASTM F833-15”.

4. The table attached at the Annex to this document summarises the major changes introduced by the latest standards<sup>Note</sup>.

5. In 2014 and 2015 we did not propose to adopt a new part of the European Standard, “BS EN 71-13:2014 Safety of toys – Part 13: Olfactory board games, cosmetic kits and gustative games” in the Ordinance in order to allow sufficient time for developing complementary test methods. We note that the provision of relevant test services is now available. Therefore, we propose to adopt the new part in this exercise so as to keep the regulatory regime under the Ordinance on par with those in major economies.

6. If you have any comments on the proposal, please send them to us on or before **31 December 2016** by any of the following means:

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<sup>Note</sup> The table is prepared for general information only. Interested parties should refer to the standards for the detailed requirements.

By mail to: Special Duties Division  
Commerce, Industry and Tourism Branch  
Commerce and Economic Development Bureau  
23th Floor, West Wing, Central Government Offices,  
2 Tim Mei Avenue, Tamar, Hong Kong

By fax to: 2869 4420

By email to: [tcpso\\_standards\\_updates@cedb.gov.hk](mailto:tcpso_standards_updates@cedb.gov.hk)

7. Any questions about this document may be addressed to Mr. M T DAI, Assistant Secretary for Commerce and Economic Development (Commerce and Industry), who can be reached at 2810 3235 (phone), 2869 4420 (fax), or [mt\\_dai@cedb.gov.hk](mailto:mt_dai@cedb.gov.hk) (email).

8. Submissions will be received on the basis that we may freely reproduce and publish them, in whole or in part, in any form and use, adapt or develop any proposal put forward without seeking permission or providing acknowledgement of the party making the proposal.

9. Please note that names of respondents, their affiliation(s) and comments may be posted on our website or referred to in other documents we publish. If you do not wish your name and/or affiliation to be disclosed, please state so when making your submission. Any personal data submitted will only be used for purposes which are directly related to consultation purposes under this consultation paper. Such data may be transferred to other Government departments/agencies for the same purposes. For access to or correction of personal data contained in your submission, please contact Ms. Ada Wong, Executive Assistant, who can be reached at 3655 5954 (phone), 2869 4420 (fax), or [ada\\_wong@cedb.gov.hk](mailto:ada_wong@cedb.gov.hk) (email).

Commerce, Industry and Tourism Branch  
Commerce and Economic Development Bureau  
December 2016

**Toys and Children's Products Safety Ordinance (Cap. 424)**  
**Updates to Standards Specified for Toys and Schedule 2 Products**

	Current Specified Standards	Updated Standards (Publication/ Effective Date)	Major Changes/Remarks	Affected Clauses
<b>Toys Standards</b>				
<b><i>International Standard</i></b>				
(i)	-	ISO 8124-7:2015 (October 2015)	<ul style="list-style-type: none"> <li>● A new part of ISO 8124 to specify requirements for the substances, materials, containers, markings and labelling used for finger paint. This part is not applicable to paint on face or body;</li> <li>● To provide for normative references, terms and definitions;</li> <li>● To specify general requirements for finger paint, as well as specific requirements regarding colourants, preservatives, migration of elements, and limits of impurities in finger paints;</li> <li>● To specify requirements on the taste and smell, and pH value of finger paints;</li> <li>● To specify requirements for binding agents, extenders, humectants and surfactants, and N-Nitrosamines in finger paints.</li> <li>● To specify requirements on containers used for finger paints.</li> </ul>	<ul style="list-style-type: none"> <li>● 1</li> <li>● 2 and 3</li> <li>● 4.1 to 4.5</li> <li>● Annexes A to E</li> <li>● 4.6 and 7</li> <li>● 4.8 and 4.9</li> <li>● Annex F</li> <li>● 4.10</li> <li>● Annex G</li> </ul>

	Current Specified Standards	Updated Standards (Publication/ Effective Date)	Major Changes/Remarks	Affected Clauses
<b>European Standard</b>				
(i)	BS EN 71-5:2013	BS EN 71-5:2015 (September 2015)	<ul style="list-style-type: none"> <li>● To remove “ceramic and vitreous enamelling materials supplied in miniature workshop sets” from the scope, terms and definitions, requirements and test methods of this part;</li> <li>● To delete the chemical substance “phthalic acid esters with straight-chain aliphatic (C6 upwards except C8) alcohols and mixtures of these esters” from Table 1;</li> <li>● To add the chemical substance “polyvinylpyrrolidone homo and copolymers” to Table 4, and to add “acrylic homo and copolymers”, “hydrophilic polyurethane containing neither free isocyanate-groups nor aromatic amino-compounds”, “polymers and copolymers of monomers permitted for materials intended to come into contact with foodstuffs”, “polyvinyl homo and copolymers”, “poly(vinyl alcohol)”, “dextrin” and “starch or modified starch” to Table 7;</li> <li>● To replace the chemical substances “petroleum fraction (60 to 140)°C” and “petroleum fraction (135 to 210)°C” with “petroleum fraction (35 to 160)°C” and “hydrocarbons, C9 – C16, hydrotreated, dearomatized” in Tables 11 and 15;</li> <li>● To delete the rationale on “phthalates”.</li> </ul>	<ul style="list-style-type: none"> <li>● 1</li> <li>● 3</li> <li>● Former 5</li> <li>● Former 11.2</li> <li>● Former Annex C</li> <li>● 5</li> <li>● 7</li> <li>● 7</li> <li>● Annex D</li> </ul>

	Current Specified Standards	Updated Standards (Publication/ Effective Date)	Major Changes/Remarks	Affected Clauses
(ii)		BS EN 71-13:2014 (April 2014)	<ul style="list-style-type: none"> <li>● A new part of BS EN 71 to specify requirements of the substances and mixtures in olfactory board games, cosmetics kits, gustative games and supplementary sets (“the games”). This part also specifies allergenic fragrances which are prohibited in toys, requirements on marking, contents list, instructions for use, the equipment intended to be used during the activity and the use of highly flammable liquids;</li> <li>● To provide for normative references, terms and definitions;</li> <li>● To specify general and specific requirements on the games, which cover substances and mixtures, preservatives, allergenic fragrances, stability of resulting products, and food allergens;</li> <li>● To specify requirements on the equipment to be used with the games, including containers and glassware, equipment for transfer of liquid and eye protection;</li> <li>● To specify requirements on warnings and markings, including general requirements, markings on individual containers for reagents, substances or mixtures, for food allergens, and when glass is used as container;</li> <li>● To specify requirements on instruction for use and contents list with warnings and first aid information.</li> </ul>	<ul style="list-style-type: none"> <li>● 1</li> <li>● 2 and 3</li> <li>● 4</li> <li>● Annex A</li> <li>● 5</li> <li>● Annex B</li> <li>● Annex C</li> <li>● 6</li> <li>● 7 and 8</li> </ul>

	Current Specified Standards	Updated Standards (Publication/ Effective Date)	Major Changes/Remarks	Affected Clauses
(iii)	BS EN 62115:2005+A11:2015	BS EN 62115:2005+A12:2015 (January 2015)	<ul style="list-style-type: none"> <li>● To add Annex ZC to provide for requirements on toys generating electromagnetic fields, specifying that toys with an integrated field source generating electromagnetic fields shall comply with EN 62233:2008 with the modifications specified.</li> <li>● To make editorial changes and add new information;</li> <li>● To remove “personal protective equipment including swimming goggles, sunglasses and other eye protectors as well as bicycle and skateboard helmets” from the list of items not covered by this standard;</li> <li>● To make editorial changes;</li> <li>● To revise the requirements on the fault conditions for evaluation of electronic circuits and on toys with integrated field source.</li> </ul>	<ul style="list-style-type: none"> <li>● Annex ZC</li> <li>● ZB.4, 16, 46 and 47 of Annex ZB</li> <li>● 1</li> <li>● 7.5</li> <li>● 9.8.2</li> <li>● 20</li> </ul>

**Schedule 2 Product Standards**

***Bunk beds for domestic use***

(i)	BS EN 747-1:2012	BS EN 747-1:2012+A1:2015 (June 2015)	<ul style="list-style-type: none"> <li>● To revise the scope to add the measurements of bunk beds and high beds to which this standard applies;</li> <li>● To update the normative references;</li> <li>● To revise the definitions of bunk bed and high bed;</li> <li>● To revise the requirements on accessible holes, gaps and openings;</li> <li>● To update the name of the standard referenced;</li> <li>● To revise the instructions for use;</li> </ul>	<ul style="list-style-type: none"> <li>● 1</li> <li>● 2</li> <li>● 3.1 and 3.2</li> <li>● 4.1.2 to 4.14</li> <li>● 4.2 to 4.5</li> <li>● 5</li> </ul>
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	Current Specified Standards	Updated Standards (Publication/ Effective Date)	Major Changes/Remarks	Affected Clauses
			<ul style="list-style-type: none"> <li>To revise the marking required for the beds, including text and pictogram.</li> </ul>	<ul style="list-style-type: none"> <li>6</li> </ul>
(ii)	BS EN 747-2:2012	BS EN 747-2:2012+A1:2015 (June 2015)	<ul style="list-style-type: none"> <li>To update the normative references;</li> <li>To revise requirements on test equipment by adding the template for V and irregular shaped openings.</li> <li>To update the test procedures, including measurements of holes, gaps and openings, V and irregular holes, gaps and openings, upwards and downwards static load on bed base, durability test on bed base, and related figures.</li> </ul>	<ul style="list-style-type: none"> <li>2</li> <li>4.10</li> <li>5.3 and 5.4</li> </ul>

***Child safety barriers for domestic use***

(i)	ASTM F1004-13	ASTM F1004-16b (August 2016)	<ul style="list-style-type: none"> <li>To revise the referenced documents and terminology;</li> <li>To revise requirements on calibration and standardisation;</li> <li>To revise the general requirements and performance requirements;</li> <li>To revise the test methods, which cover requirements on test fixture, testing guidelines, and various tests on different mechanisms;</li> <li>To revise the marking and labelling requirements and instructional literature, which include text and symbol to be used for warnings and items to be included in the instructions.</li> </ul>	<ul style="list-style-type: none"> <li>2 and 3</li> <li>4.5</li> <li>5 and 6</li> <li>7</li> <li>8 and 9</li> </ul>
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***Children's high chairs and multi-purpose high chairs for domestic use***

(i)	ASTM F404-14a	ASTM F404-16a (March 2016)	<ul style="list-style-type: none"> <li>To revise the scope and terminology;</li> </ul>	<ul style="list-style-type: none"> <li>1 and 3</li> </ul>
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	Current Specified Standards	Updated Standards (Publication/ Effective Date)	Major Changes/Remarks	Affected Clauses
			<ul style="list-style-type: none"> <li>● To revise the performance requirements, which cover stability, restraint system, passive crotch restraint system, protrusions and related figures;</li> <li>● To revise requirements on test methods, which cover stability testing, restraint system retention test, completely bounded openings, tether length test method and protrusion evaluation;</li> <li>● To revise requirements on labelling and warnings.</li> </ul>	<ul style="list-style-type: none"> <li>● 6.5, 6.8, 6.9 and 6.13</li> <li>● 7</li> <li>● 8</li> </ul>
(iii)	ISO 9221-1:1992	ISO 9221-1:2015 (November 2015)	<ul style="list-style-type: none"> <li>● To revise the scope and normative references;</li> <li>● The revise the definition of children's high chair and to add new terms and definitions;</li> <li>● To revise the requirements on materials and construction;</li> <li>● To add requirements on stability;</li> <li>● To revise requirements on packaging and product information, which cover marking, warnings, instruction for use and additional information.</li> </ul>	<ul style="list-style-type: none"> <li>● 1 and 2</li> <li>● 3</li> <li>● 4 and 5</li> <li>● 6</li> <li>● 7 and 8</li> </ul>
(iv)	ISO 9221-2:1992	ISO 9221-2:2015 (November 2015)	<ul style="list-style-type: none"> <li>● To revise the scope and normative references;</li> <li>● To add terms and definitions;</li> <li>● To add general test conditions, which include preliminary preparation, determination of the junction line, test sequence, and tolerances;</li> <li>● To revise requirements on test equipment;</li> <li>● To revise and add new test procedures;</li> </ul>	<ul style="list-style-type: none"> <li>● 1 and 2</li> <li>● 3</li> <li>● 4</li> <li>● 5</li> <li>● 6</li> </ul>

	Current Specified Standards	Updated Standards (Publication/ Effective Date)	Major Changes/Remarks	Affected Clauses
			<ul style="list-style-type: none"> <li>To revise requirements on test report.</li> </ul>	<ul style="list-style-type: none"> <li>7</li> </ul>
<b>Playpens for domestic use</b>				
(i)	ASTM F406-13	ASTM F406-15 (December 2015)	<ul style="list-style-type: none"> <li>To add definition, general requirements and test requirements on “cantilevered accessory”;</li> <li>To add a note on exclusion</li> <li>To clarify the placement of stability test device under test methods;</li> <li>To specify warning requirement on cribs intended for used in child care facilities.</li> </ul>	<ul style="list-style-type: none"> <li>3.1.4</li> <li>5.15</li> <li>8.26.1 to 8.26.3</li> <li>5.16.1</li> <li>8.17.4</li> <li>9.4.2.11</li> </ul>
<b>Wheeled child conveyances</b>				
(i)	ASTM F833-13b	ASTM F833-15 (December 2015)	<ul style="list-style-type: none"> <li>To add definition of “convertible car seat/stroller”, “tray/grab bar locking position”, “tray/grab bar stop position” and “discussion” under terminology;</li> <li>To revise performance requirements, which cover static load, car seat/stroller products, and passive containment/foot opening;</li> <li>To revise test methods for passive containment/foot opening, which cover testing tray / grab bar locking positions and testing tray / grab bar stop positions;</li> <li>To revise warning requirements, which cover products with a removable-wheel fork assembly and three wheeled strollers that contain a locking front swivel wheel intended to be used for running, jogging or walking fast.</li> </ul>	<ul style="list-style-type: none"> <li>3.1.5</li> <li>3.1.24 to 3.1.25.1</li> <li>6.2</li> <li>6.6</li> <li>6.8</li> <li>7.12</li> <li>8.2.2.4 and 8.2.2.5</li> </ul>