

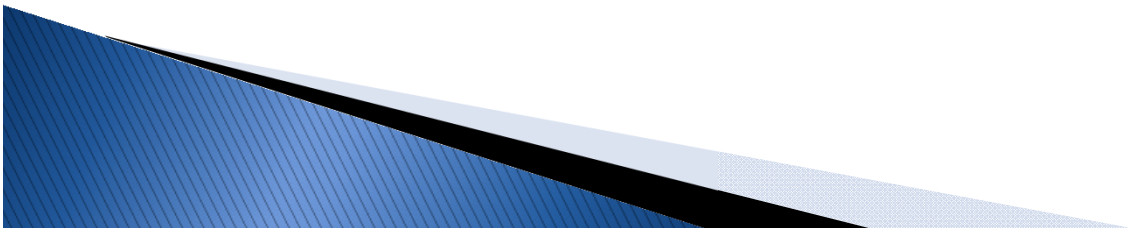
Requirements for Toy Safety in Australia

ATA Member Update



**Australian Toy
Association**

Richard Hayman – November 2015



Introduction

Requirements for product safety evolve in response to new developments and injury data from both Australia and overseas

This webinar is a part of our ongoing effort to keep ATA members informed about compliance requirements generally and provide specific information on changes as they occur.

Please Note

- Information is provided 'to the best of our knowledge'
- Should not be taken as legal advice
- Contact us directly if you have a specific issue

Email compliance@austoy.com.au

Topics

- Types of requirements
 - Mandatory
 - Voluntary
 - Claims
- Updates to requirements
- Common issues
- Questions
- Assistance for members

Mandatory Requirements / Regulations

- Made mandatory by law
 - Illegal to sell product that doesn't comply
- Various categories, laws and regulators
 - Consumer product safety - ACCC / States and Territories
 - Electrical safety – States and Territories
 - Radiofrequency and EMC - ACMA
 - Imports generally - Customs
- Often based on requirements from Australian standards
 - May be the whole standard or only a small part
- Why have them?
 - Suppliers don't always do the right thing
 - Easier enforcement for a specific requirement

Complying with Mandatory Requirements

- Challenges
 - Differences to standards
 - Intentional variations
 - Outdated references
 - Incorrect understanding of the standard
 - Impacts
 - Additional testing required
 - More difficult to understand and comply
 - Higher cost
 - Out of sync with global practises
 - Modifications specifically for Australia
 - Higher cost
- No flexibility
 - High risk if you get it wrong



Complying with Mandatory Requirements

- Test reports
 - The requirements are mandatory, not the report (normally)
 - Normally the easiest way to know that your product complies – peace of mind
 - Validity
 - Laboratory accredited?
 - Complete report?
 - Validity period?
 - Relate to your product?
 - Relate to the regulation
 - Recommend to test to latest version of the standard
 - May need to have incremental tests to cover variations due to outdated references, etc
 - Managing costs
 - Grouping
 - Relying on alternative standards
- Other activities
 - Validate the vendor
 - Validate the shipment
 - Protect yourself against errors and deception



Regulations with Outdated References

Regulation	Product	Referenced Standard	Known Issues	Current Standard
<u>Consumer Protection Notice No 3 of 2009</u> Consumer product safety standard for swimming aids and flotation aids for water familiarisation and swimming tuition	Swimming aids	AS1900-2002	Stitching Buckles	AS/NZS 1900:2014
<u>Consumer Protection Notice No. 4 of 2006</u> Consumer Product Safety Standard for Babies' Dummies	Dummies	AS 2432-1991	Dummies that pass the standard are known to subsequently deteriorate and generate hazards	AS 2432:2015
<u>Consumer Protection Notice No. 33 of 2011</u> Revocation of interim ban and imposition of permanent ban on certain babies' dummies to which there are crystals, beads or other similar ornaments attached	Dummies	AS 2432 - 2009		AS 2432:2015
<u>Consumer Protection Notice No 1, 2009</u> Consumer product safety standard for lead and certain elements in children's toys	Toys that may be licked sucked or swallowed	AS/NZS ISO 8124.3:2003	None, but current requirements are more inclusive due to change in defn of what may be licked sucked or swallowed	AS/NZS ISO 8124.3:2012
<u>Consumer Protection Notice No. 14 of 2003</u> Consumer Product Safety Standard: Toys for children up to and including 36 months of age as amended by Consumer Protection No. 1 of 2005.	Toys for Children Aged less than 36 Mths	AS/NZS ISO 8124.1:2002	Soft filled toys	AS/NZS ISO 8124.1:2013
<u>Consumer Protection Notice No 2 of 2009</u> Consumer product safety standard for flotation toys and aquatic toys	Aquatic toys	AS/NZS ISO 8124.1:2002	None	AS/NZS ISO 8124.1:2013
<u>Consumer Protection Notice No 5 of 2010</u> Consumer product safety standard for Children's Toys Containing Magnets	Magnets in toys	AS/NZS ISO 8124.1:2002	None, but current requirements are more onerous. Standard was updated as incidents continued internationally after the original requirements were added.	AS/NZS ISO 8124.1:2013
<u>Consumer Protection Notice No. 16 of 2010</u> Consumer product safety standard for children's projectile toys	Toys with Projectiles	AS/NZS ISO 8124.1:2002	Wind up rubber band powered aeroplanes Hand operated rotors	AS/NZS ISO 8124.1:2013

ATA Activities related to Regulations

- Compliance with the voluntary standard should ensure compliance with the regulation
 - Lobby to update outdated references
 - Argue against variations
 - Change the AS
 - Change the regulation
- Requirements should be aligned globally
 - Ideally, compliance with EN or ASTM should ensure compliance with our standard
 - Lobby to enable references to international standards
 - Involvement in ISO to align standards

Voluntary Requirements

- Requirements that may be implemented to meet a certain objective
 - General requirement under the Australian Consumer Law to ensure that products are safe for their intended user
- Provides more flexibility and choice
 - Standards – EN vs. ASTM vs. ISO vs. AS
 - Codes of practise
 - Risk assessments by a qualified lab
 - EU type approvals
- Advantages of Standards
 - Consensus amongst stakeholder experts
 - Possibility of alignment
 - Good basis for regulation if required

Complying with Voluntary Requirements

- Identify appropriate requirements
 - Local or international standards – equally valid
 - Use standards for related products (if appropriate)
- Still need to validate compliance
 - Test reports
 - Critically review reports, vendors and shipments



ATA Activities Related to Voluntary Requirements Australian Toy Association

- Standards should be aligned globally
 - Compliance is easier and cheaper
 - Get the advantage of international experience
- Standards should be rational
 - Based on hazards
 - International experience
 - Fast response to newly identified hazards
- ATA Involvement
 - Participate in local and international development
 - Drive the adoption of international standards locally

Claims

- A statement or promise made about the product
 - Non-toxic
 - Complies with ...
 - A compliance mark – CE, RCM, etc.
- Need to be careful about making false or misleading declarations
 - Best to have supporting documentation
 - May be more economical not to make the claim
- Proof of compliance should match the claim
 - Laboratory declaration of conformity
 - Test reports
 - Toxicological risk assessment

Identifying Applicable Requirements

- ATA Requirements list
 - <http://austoy.com.au/members-only/safety-compliance>
 - Shows the source of the requirement
 - Indicates whether mandatory
 - Updated as information becomes available
 - Available to ATA members
- ACCC Product Safety Site
 - <http://www.productsafety.gov.au/content/index.phtml/itemId/970225>
 - Mandatory requirements and recommendations
- Standards Australia
 - <http://infostore.saiglobal.com/store/>
 - Voluntary requirements
 - May be needed to understand mandatory requirements
- Other Regulator Sites
 - ACMA
 - ERAC
 - NICNAS
 - Etc



Updates to Requirements

- Follow the order of the ATA Requirements List
- Excerpt

Australian Compliance Requirements for Toys					
Published by the Australian Toy Association			Note: - Product should comply with requirements for all applicable categories		Issue Date: TBA Supersedes: October 2014
Category	Standard / Regulation	Authority	Description	Mandatory	Refer Also
All Toys (General)	AS/NZS ISO 8124.1:2013	Standards Australia	Aus / NZ Standard for Mechanical and Physical Properties of Toys	No	Toys for Children Aged less than 36 Mths Toys with Projectiles Magnetic Toys
	AS/NZS ISO 8124.2:2009	Standards Australia	Aus / NZ Standard for Flammability of Toys	No	
	AS/NZS ISO 8124.9 10 & 11:2008	Standards Australia	Aus / NZ Standard for Organic requirements, sample preparation and methods of analysis	No	
	Commerce (Imports) Regulation 1940 Commerce (Trade Descriptions) Act 1905	Customs ACCC	An accurate Country of Origin statement	Yes	
Migration of Heavy Metals					
All toys	AS/NZS ISO 8124.3:2012	Standards Australia	Aus / NZ Standard for Migration of Certain Elements (Heavy Metals) Specifies maximum allowable levels of certain heavy metals in the following categories of toys: - all intended food and oral contact toys, cosmetic toys and writing instruments categorized as toys, irrespective of any age grading or recommended age labelling - all toys intended for or suitable for children up to 72 months of age - accessible coatings, irrespective of any age grading or recommended age labelling - accessible liquids, pastes, gels (e.g. liquid paints, modelling compounds), irrespective of any age grading or recommended age labelling	No	
Toys that may be licked sucked or swallowed	AS/NZS ISO 8124.3:2003 (Superseded)	Standards Australia	Aus / NZ Standard for Migration of Certain Elements (Heavy Metals) Specifies maximum allowable levels of certain heavy metals in toys that may be licked sucked or swallowed. These are categorised as - All intended food / oral contact toys, cosmetic toys and writing instruments categorised as toys - All accessible parts and components of toys intended for children under 6 years of age where there is a probability that those parts or components may come into contact with the mouth	No	Consumer Protection Notice No 1, 2009 Australian Customs Notice No 2007/46
	Consumer Protection Notice No 1, 2009	ACCC	Requires compliance with AS/NZS ISO 8124.3:2003 Note: EN71-3:1994/A1:2000/AC:2002 is equivalent and also acceptable	Yes	Note that the CPN references the 2003 version of the standard rather than the current 2012 version
Coatings, (e.g. paints, lacquers, etc), on toys, money boxes, pencils and paintbrushes	Australian Customs Notice No 2007/46	Customs	Prohibits the import, (without the written permission of the Minister), of toys, money boxes, pencils and paintbrushes with coatings in which the migratable levels of specified heavy metals would exceed those specified in AS/NZS ISO 8124.3:2003	Yes	Note that the notice references the 2003 version of the standard rather than the current 2012 version
Erasers resembling food in scent or appearance	Australian Customs Notice No 2007/46	Customs	Prohibits the import, (without the written permission of the Minister), of erasers that resemble food in scent or appearance and that would fail the requirements of AS/NZS ISO 8124.3:2003	Yes	Note that the notice references the 2003 version of the standard rather than the current 2012 version
Activity Toys	AS/NZS ISO 8124.6:2011 plus Amd 1	Standards Australia	Aus / NZ Standard for swings, slides and similar activity toys for indoor and outdoor family domestic use. Amendment 1 adds inflatable activity toys	No	Updated version in progress to include paddling pools
Publications, films and computer games	Classification (Publications, Films and Computer Games) Act 1995	Classification Board	Requires a Certificate of Classification by the Classification Board	Yes	
Cosmetics - (Including tattoos and anything applied to the skin)	Consumer Product Information Standard (Cosmetics) 1991 and Amended 1998 and 2008	Federal Regulation ACCC	Cosmetics and toiletries ingredient Labelling	Yes	
	Industrial Chemicals (Notification and Assessment) Act 1989	Federal Regulation NICNAS	May not include prohibited or restricted cosmetic chemicals	Yes	
	Cosmetics Standard 2007	Federal Regulation NICNAS	Cosmetics of certain product categories must comply with specific standards mentioned in the Act	Yes	
	Industrial Chemicals (Notification & Assessment) Act	Federal Regulation NICNAS		Yes	

AS/NZS ISO 8124.1

- Mechanical and physical properties
- Mostly voluntary, but some requirements referenced
- Currently 2013 version
- New version to be published early in 2016
 - Updated requirements for projectiles
 - New requirements for impaction and impalement
 - Incorporate modification to clarify exemption of fibre fill from small parts requirements
- ACCC have indicated that related regulations will be reviewed once the standard is published – (2002 version currently)
 - Toys for children under 3
 - Toys with projectiles
 - Toys with magnets
 - Flotation / aquatic toys



AS/NZS ISO 8124.1 Mandatory Requirements

- Toys for children under 3
 - Requirements substantially unchanged
 - Hope to stop unnecessary recalls of toys where fibre fill is released
- Toys with projectiles
 - Should eliminate some confusion
 - Clarification for windup rubber band airplanes
 - Kinetic energy density allowed increases
- Toys with magnets
 - Requirements more onerous
 - Hazardous magnets not allowed except for experimental sets
 - In line with other international requirements
- Flotation / Aquatic toys
 - Possibility of more flexibility in the warning text

AS/NZS ISO 8124.2

- Flammability
- Voluntary
- Mostly for disguise costumes and toys that a child will enter
- Currently 2009 version
- New version to be published early in 2016
- Updated to align with EN 71.2

AS/NZS ISO 8124.3

- Migration of certain elements
- Currently 2012 version, but 2003 version is regulated
- Amendment to be published early in 2016
 - Allow testing of raw materials used to make the toy
- Expect the regulation to be reviewed along with those referencing part 1
 - Slightly more onerous in that there are requirements for toys for all ages of child
 - No change to migration limits
- Would also apply to toy cosmetics, coatings on pencils etc. and certain erasers
- Note that EN 71.3 can no longer be relied on without some further analysis
- Note also that ASTM F963 now also includes migration requirements so can be used providing the results are checked (same as EN)

AS/NZS ISO 8124.6

- Activity toys
- Currently 2011 version
- Voluntary
- New version to be published early in 2016
 - Adds requirements for paddling pools
- Would like to have referenced in regulation for portable pools, but no plans at this time

AS 8124.7

- Fingerprints
- Mandatory
- Current version is 2003
- Should be published mid 2016
- Aligned with updated EN 71.7
- Hope to be included in review of regulations impacting toys
 - Migration limits not changed
 - Limits for impurities added

AS/NZS 8124.?

- Age determination
- New standard / Technical report
- Provides guidance on the determination of the earliest age of child for which toys would be suitable.
- Important for the application of certain requirements
- Will replace current CPSC document (last reviewed in 2002)

AS/NZS 8124.?

- Total concentration of certain elements
- New standard
- Should be published mid 2016
- Intended as a first action method to reduce the need for migration testing



Electrical and Electronic Toys

- Sheet updated to clarify requirements related to EMC vs. Electrical Safety vs. Energy efficiency
- Standard versions have been updated, but no significant differences

Category	Standard / Regulation	Authority	Description	Mandatory	Refer Also
Electrical & Electronic Toys					
EMC					
All product that does not intentionally transmit radio frequencies	Radiocommunications Labelling (Electromagnetic Compatibility) Notice 2008 & Amendments up to 2013	ACMA	Requires compliance with applicable standards and defines labelling and documentation requirements From March 1, 2013 new labelling arrangements will be implemented so that the RCM mark will be the single compliance mark indicating a device's compliance with all ACMA regulatory requirements The new arrangements apply to new suppliers from 1/3/2013 and to all suppliers from 1/3/2016	Yes	
Applicable EMC Standards for non-intentional emitters by product	AS/NZS CISPR 14.1:2013	Standards Australia	Household appliances, electric tools and similar apparatus - EMC compatibility requirements	Yes	
	AS/NZS CISPR 15:2011	Standards Australia	Electrical lighting and similar equipment - Limits and methods of measurement of radio disturbance characteristics of	Yes	
	AS/NZS CISPR 22:2009 + A1:2010	Standards Australia	Information technology equipment - Radio disturbance characteristics Limits and methods of measurement	Yes	
	AS/NZS 61000.6.3:2012	Standards Australia	Products without a specific EMC Standard - Electromagnetic compatibility (EMC) – Part 6.3: Generic standards – Emission standard for residential, commercial and light-industrial environments	Yes	
All product that intentionally transmits Radio frequencies (Exc Infrared)	Radiocommunications Act 1992	ACMA		Yes	
	Radio Frequency Licenses	ACMA		Yes	
	AS/NZS 4268:2012	Standards Australia	Radio Equipment and Systems – Technical Characteristics and Test Methods	No	
	Radiocommunications (Short Range Devices) Standard 2014	ACMA	Requires compliance with AS/NZS 4268	Yes	
	Radiocommunications Devices (Compliance Labelling) Notice 2014	ACMA	Requires compliance with applicable standards and defines labelling and documentation requirements From March 1, 2013 new labelling arrangements will be implemented so that the RCM mark will be the single compliance mark indicating a device's compliance with all ACMA regulatory requirements The new arrangements apply to new suppliers from 1/3/2013 and to all suppliers from 1/3/2016	Yes	
Infrared Radio Transmitters	Radio Frequency Licenses	ACMA		Yes	
Electrical & Electronic Toys					
Electrical Safety					
General	Electricity (Consumer Safety) Act 2004 and its Regulations	State Regulation	Covers the distribution of safe electrical appliances and other electrical goods	Yes	
	Electrical Equipment Safety Scheme	State Regulation	Requirements for approval and registration of electrical equipment between 50 and 1000 V Intended to replace the existing requirements for declared and non declared articles. Applies in all States except NSW (NSW will continue with its existing system of 'Declared Articles')	Yes	
	AS/NZS 3820:2009	Standards Australia	Essential safety requirements for electrical equipment	Yes	Called up by State Regulation Note that this includes requirements for lasers and LED's
	AS/NZS 62115:2011	Standards Australia	Electrical Safety Requirements for Toys	No	Needed to comply with AS/NZS 3820
Toys with External Power Supplies	AS/NZS 61558.1 AS/NZS 61558.2.7:2008	Standards Australia	Safety of power transformers, power supply units and similar Part 2.7: Particular requirements for transformers and power supplies for toys	No	Needed to comply with AS/NZS 3820
Battery Chargers	AS/NZS 60335.2.29:2004 (Incorporating Amendment No's 1 and 2)	Standards Australia	Household and similar electrical appliances—Safety Part 2.29: Particular requirements for battery chargers	No	Needed to comply with AS/NZS 3820
Electrical & Electronic Toys					
Energy Efficiency					
Toys with External Power Supplies	Electricity Safety (Equipment Efficiency) Regulations 2009	State Regulation	External power supplies made or imported after Nov 2008 must meet or exceed the requirements of performance mark III in AS/NZS4665 – 2005 Nameplate to be marked with indication of energy performance Products must be registered with State Authorities	Yes	Online registration is available at www.energyrating.gov.au

Electrical and Electronic Toys

- RCM Mark to be fully implemented by March 1, 2016
 - Shouldn't really be using c-tick any more
 - Note that you also need the reports and declaration of conformity
- Button Batteries
 - Requirements of 62115 should be considered mandatory for toys.
 - Consider applying the same requirements to other products that may be used by or attractive to children
 - ACCC seem reluctant to regulate, but are enforcing action on product thought to be unsafe
 - Working group has been formed to develop a code of practise
 - Standards for electrical safety are also being updated generally
 - ATA will try to ensure that requirements are aligned between standards and internationally

AS 1900

- Swimming Aids
- Mandatory – References 2002 version
- New version published in 2014
 - Revised to resolve problems with the requirements for strength of stitching and belt buckles
- Asked ACCC to review regulation
 - Not a high priority for them
 - Not seeing enforcement related to those issues in any case

Laser Pointers

- Updated from last review
- Laser pointers over 1 mW are a prohibited weapon
- Can't carry or use even a lower powered laser pointer in a public place without a reasonable excuse

AS 2432

- Dummies
- 2 regulations referencing 2 different older versions of the standard
- New version published in 2015
- Asked ACCC to review and it is under consideration
 - Closely aligned with EN 1400
 - Added material requirements
 - Strengthened design and construction to address failures and clarify requirements

Bean Bags

- Updated regulation comes into force in January
 - Warning changed
 - Requirements for child resistance clarified

AS 4989

- Trampolines
- Voluntary
- New version published in 2015
- ACCC has advised that they have no plan to mandate it at this stage
- EN 71.14 has been published and is mandatory in Europe
 - It is being reviewed almost immediately to add further requirements
 - Have arranged for the CEN group to have access to our standard in case it is useful and to support alignment

Common Concerns

- Validity of test reports
 - Based on custom and practise
 - What is sufficient to give a reasonable level of comfort.
 - Expect to update part 3 tests every 12 months
 - Others as required due to change in product or vendor – Consider maximum of 5 years.
- Incorrect test reports
 - Don't match the product
 - Incomplete
 - Incorrect findings

Common Concerns

- Application of EN 71
 - Acceptable for proving that the toy is safe (as is ASTM F963)
 - Risky to rely on it for compliance with a regulation due to subtle differences and lack of flexibility
 - Some exceptions based on your ability to review and analyse the report
- Labelling
 - Best to apply country of origin to everything
 - Products for children should be age graded to manage the requirements
 - Need for trademark or address is dependent on product, e.g. sold by measure and packed in Australia -> address required under Trade Measurements Act
 - Warning 'Not for children under 3'
 - Should only be used on toys for children between 3 and 6 yrs that contain a small part as supplied

Common Concerns

- Electrical safety
 - Partly driven by button battery issues
 - Looking for consistency across any applicable standards
 - Also issues with understanding the process and application.
 - Electrical safety is generally mandatory, but less than 50 V is out of scope for ERAC so no one enforces it.
 - Anything over 50 V would need
 - Proof of compliance
 - The compliance mark (RCM)
 - Prescribed articles need an additional process of certification and registration as a responsible supplier
 - Note the difference to EMC

Submitted Questions

- Requirements for products with button batteries
 - Work being done with various electrical groups
 - Expect to require a tool for accessibility
 - Expect a warning in the instructions at least and possibly on the packaging
 - ACCC are hoping for a guideline to be available for Christmas, but the work is not started yet.
- Additional Regulations
 - Not that we have been told about
 - The trend is more towards deregulation
 - Changes must satisfy rules set by the Office of Best Practise Regulation
 - We will lobby the Minister for a process that will allow more agility (at least for revisions)



Questions

Q Is there a legal requirement for the validity date of the report?

A No, the validity periods have become a 'custom and practise' driven by the need to have some relationship between the report date and the product being shipped.

For mechanical and physical properties the period can be longer as it is easier to see that the physical characteristics are the same – In general a new report would only be required for a change in vendor or design, but an upper limit to the validity should also be applied. 5 yrs is suggested for this.

The properties of materials can't be judged by eye so a shorter period has become the norm – in general reports are expected to be dated within 12 months of the products shipment from the supplier.

Q Total concentration test is this the same as composite testing?

A No, 'total concentration' looks at how much of an element, e.g. lead, is in the material as opposed to 'migration' which looks at how much of the element would become available under certain conditions, e.g. if the material was swallowed.

The principle is that we couldn't have more than 90 ppm of lead migrated if there isn't more than 90 ppm in the material in the first place.

This is different to composite testing which would combine several materials and look at the total concentration or migration from the combination.

Composite testing is not allowed as the combination could hide the failure of a particular material



Questions (Ctnd)

Q Where can we view the 2016 standard so that we could make comment?

A The draft can be downloaded from the Standards Australia website
<https://hub.standards.org.au/hub/public/index.jsp>

However, because we are adopting an ISO document, you would not see the full text so it is not very useful.

Please note that I represent the ATA and the NZTDA on this and we have proposed the adoptions in line with our objectives for globally aligned rational standards.

We are also setting up a product safety committee within the ATA that will have access to SA committee documents and therefore contribute to the directions taken.

Q A soft toy with a sewn in concealed non replaceable button battery - would be considered ok/safe? Would a 62115 test still be required?

A A 62115 report should be obtained for any toy with a button battery
The test includes some foreseeable abuse that would check that the battery didn't become accessible unintentionally

Q Could you please clarify the standard number and section pertaining to bean bags

A The regulation is CPN no. 4 of 2014
<http://www.productsafety.gov.au/content/index.phtml/itemId/971646/fromItemId/971640>
The requirements are contained in the regulation directly – There is no referenced standard



Questions (Ctnd)

Q What is the specific difference in Pb level between AS and EN71.13?

A The allowed migration levels of lead in EN 71-3 are:

160 mg/kg in scraped off material

3.4 mg/kg in liquid or sticky material

13.5 mg/kg in powder like or pliable material

The allowed migration level of lead in 8124.3 is 90 mg/kg for all materials

Q Does ISO8124.3 cover all aspects of AS/NZS ISO8124.3? is ISO8124.3 accepted in Australia?

A AS/NZS ISO 8124.3 is a modified adoption of ISO 8124.3

The modification is just to provide for the fact that we have a separate standard for fingerpaints and ISO didn't at the time.

Compliance with the ISO standard would be the same as compliance with the AS/NZS standard.

Q Because EN71 Part 3 is not identical to AS/NZS ISO 8124 Part 3, moving forward we should comply with AS/NZS ISO Part 3?

A The AS/NZS standard is the mandatory one.

You can use an EN 71-3 report to confirm compliance with the AS/NZS standard if you have the ability to review the results of the EN report and confirm that they are within the limits provided in the AS/NZS standard



Questions (Ctnd)

Q Can you please clarify what we need for puppets?

A I would need to see the item to know for sure.

They are toys so it would be 8124.1 and 8124.3 as a minimum

Note that only part 3 would be mandatory

They would also need a country of origin statement

Q Can you please clarify what we need for soft bodied dolls that are for over 3 years of age?

A You would need some justification for the age grading as plush product is generally considered suitable for under 3's

So long as that was covered, then the requirements would be 8124 parts 1, 2 and 3

Note that only part 3 would be mandatory

They would also need a country of origin statement

Q There is some confusion on Toys with Magnets as to if the Magnet must be totally enclosed. e.g. Magnetic Numbers for Blackboards have exposed magnets glued into the back. Do these still meet the standard?

A All toys with magnets should meet the requirements for magnets in 8124.1

These specify that magnets with a flux index greater than 50 kG2mm2 shall not be small parts.

Magnets in magnet numbers are not normally this strong (they don't need to be)

Strong magnets that are glued in or attached to other parts would need to still be attached after the specific foreseeable abuse tests that apply to magnets – there is no specific need to have them fully enclosed although that is one way of attaching them.

Questions (Ctnd)

Q Would you classify a music jewellery box as a toy?

A I would need to see the item to know for sure.

It would depend on whether the item was intended to be used in play or not

Typically, I would imagine that they are for the storage of jewellery for older children and adults, but I'm sure that there are imitation versions intended for younger children to play with.

Q Do you know if ASTM cover fabric material?

A ASTM F963 is a full set of safety requirements for toys and covers those made from fabric

Member Information and Assistance

- General
 - Information
 - Maintain requirements listing
 - General advice on requirements
 - General advice on compliance process
 - Support for issues that have industry significance
- Specific Member Assistance
 - Email compliance@austoy.com.au
 - Specific advice on requirements
 - Specific advice on compliance process