

Proposed Updates to Safety Standards for Toys and Children’s Products

The Government proposes to adopt 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 eight classes of Schedule 2 products have been updated/amended to new versions as follows -

Toy Standards –

- (a) the existing part of the International Standard, “ISO 8124-3:2010 (incorporating Amendment 1:2014)” has been updated to “ISO 8124-3:2010 (incorporating Amendment 2:2018)”;
- (b) the existing part of the International Standard, “ISO 8124-4:2014 (incorporating Amendment 1:2017)” has been updated to “ISO 8124-4:2014 (incorporating Amendment 2:2019)”;
- (c) the existing part of the European Standard “BS EN 71-1:2014” has been updated to “BS EN 71-1:2014 + A1:2018”;
- (d) the existing part of the European Standard “BS EN 71-3:2013 + A3:2018” has been updated to “BS EN 71-3:2019”;
- (e) the existing part of the European Standard “BS EN 71-14:2014 + A1:2017” has been updated to “BS EN 71-14:2018”.

Schedule 2 Product Standards –

- (a) the existing European Standards “BS EN 1400:2013 + A1:2014” for babies’ dummies has been updated to “BS EN 1400:2013 + A2:2018”;
- (b) the existing ASTM Standard “ASTM F977-12” for baby walking frames has been updated to “ASTM F977-18”;
- (c) the existing ASTM Standard “ASTM F1004-18” for child safety barriers for domestic use has been updated to “ASTM F1004-19”;
- (d) the existing ASTM Standard “ASTM F1169-13” for children’s cots for domestic use has been updated to “ASTM F1169-19”;
- (e) the existing International Standard “ISO 7175-1:1997” for children’s cots for domestic use has been updated to “ISO 7175-1:2019”;
- (f) the existing International Standard “ISO 7175-2:1997” for children’s cots for domestic use has been updated to “ISO 7175-2:2019”;
- (g) the existing ASTM Standard “ASTM F404-18” for children’s high chairs and multi-purpose high chairs for domestic use has been updated to “ASTM F404-18a”;
- (h) the existing European Standard “BS EN 71-3:2013 + A3:2018” for children’s paints has been updated to “BS EN 71-3:2019”;
- (i) the existing International Standard “ISO 8124-3:2010 (incorporating Amendment 1:2014)” for children’s paints has been updated to “ISO 8124-3:2010 (incorporating Amendment 2:2018)”;
- (j) the existing ASTM Standard “ASTM F406-17” for playpens for domestic use has been updated to “ASTM F406-19”;
- (k) the existing European Standard “BS EN 1888:2012” for wheeled child conveyances has been updated to “BS EN 1888-1:2018” and “BS EN 1888-2:2018”; and
- (l) the existing ASTM Standard “ASTM F833-15” for wheeled child conveyances has been updated to “ASTM F833-19”.

4. The table attached at the Annex to this document summarises the major changes introduced by the latest standards^{Note}.

5. If you have any comments on the proposal, please send them to us on or before **31 December 2019** by any of the following means:

By mail to: Division 6
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

6. Any questions about this document may be addressed to Mr. H Y Tse, Assistant Secretary for Commerce and Economic Development (Commerce and Industry), who can be reached at 2810 3235 (phone), 2869 4420 (fax), or hy_tse@cedb.gov.hk (email).

7. 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.

8. 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 (email).

Commerce, Industry and Tourism Branch
Commerce and Economic Development Bureau
December 2019

^{Note} The table is prepared for general information only. Interested parties should refer to the standards for the detailed requirements.

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
Toy Standards				
<i>International Standard</i>				
(i)	ISO 8124-3:2010 (incorporating Amendment 1:2014)	ISO 8124-3:2010 (incorporating Amendment 2:2018) (September 2018)	<ul style="list-style-type: none"> ● To add the maximum acceptable element migration from finger paint. 	<ul style="list-style-type: none"> ● Table 1
(ii)	ISO 8124-4:2014 (incorporating Amendment 1:2017)	ISO 8124-4:2014 (incorporating Amendment 2:2019) (March 2019)	<ul style="list-style-type: none"> ● To add an example of gondola; ● To revise the requirement on the minimum clearance between adjacent swing elements and adjacent structures; ● To revise the exemption for lateral stability of swing elements; and ● To revise the requirement on the minimum clearance between swing element and the ground. 	<ul style="list-style-type: none"> ● Figure 4 ● Table 1 ● 4.7.6 ● Table 2 and Annex A
<i>European Standard</i>				
(i)	BS EN 71-1:2014	BS EN 71-1:2014 + A1:2018 (December 2018)	<ul style="list-style-type: none"> ● To revise the scope, normative references and terms and definitions; ● To revise the general requirements; ● To revise the requirements for toys intended for children under 36 months; ● To revise a requirement for packaging; ● To revise the requirements for warnings; ● To revise the test methods; and ● To revise the background and rationale. 	<ul style="list-style-type: none"> ● 1, 2 and 3 ● 4 ● 5 ● 6 ● 7 ● 8 ● Annex A

	Current Specified Standards	Updated Standards (Publication/ Effective Date)	Major Changes/Remarks	Affected Clauses
(ii)	BS EN 71-3:2013 + A3:2018	BS EN 71-3:2019 (April 2019)	<ul style="list-style-type: none"> ● To revise the terms and definitions; ● To revise the migration limit value for chromium (VI) for Category III material; ● To revise the list of reagents and apparatus; ● To revise the requirements for sampling and sample preparation; ● To revise the migration methodology; ● To revise the stabilization and analysis of migration solutions; ● To revise the calculation of migration; ● To introduce data on method performance based on the results of test method validation and in particular the results of an interlaboratory comparison; ● To revise the requirements on test report; ● To add new informative annexes containing information on <ul style="list-style-type: none"> - method validation, - estimation of reproducibility, and - toy material visual particle size comparison materials; ● To revise the method of analysis for general elements; ● To replace the method for analysis for chromium (III) and chromium (VI) by a method of analysis for chromium (VI); ● To revise the method of analysis for organic tin; and ● To revise the rationale. 	<ul style="list-style-type: none"> ● 3 ● Table 2 ● 6 ● 7 ● 8 ● 9 ● 10 ● 11 ● 12 ● Annex B ● Annex C ● Annex D ● Annex E ● Annex F ● Annex G ● Annex H

	Current Specified Standards	Updated Standards (Publication/ Effective Date)	Major Changes/Remarks	Affected Clauses
(iii)	BS EN 71-14:2014 + A1:2017	BS EN 71-14:2018 (December 2018)	<ul style="list-style-type: none"> ● To revise the normative references and terms and definitions; ● To revise the classification of trampoline categories; ● To revise the general requirements; ● To revise the requirements on warnings, markings and instructions; ● To revise the test methods; and ● To revise the rationale. 	<ul style="list-style-type: none"> ● 2 and 3 ● 4 ● 5 ● 6 ● 7 ● Annex A
Schedule 2 Product Standards				
<i>Babies' dummies</i>				
(i)	BS EN 1400:2013 + A1:2014	BS EN 1400:2013 + A2:2018 (September 2018)	<ul style="list-style-type: none"> ● To add "polycarbonate and polysulphone" to the requirements and tests on materials; ● To revise the limits of element migration from soothers; ● To revise the migration limit of Bisphenol A from polycarbonate or polysulphone; and ● To revise the rationale. 	<ul style="list-style-type: none"> ● Table 4 ● Table 5 ● Table 10 ● Annex B
<i>Baby walking frames</i>				
(i)	ASTM F977-12	ASTM F977-18 (August 2018)	<ul style="list-style-type: none"> ● To add the rationale on the revised calculation on the effect of the weight of the child's legs and lower torso. 	<ul style="list-style-type: none"> ● X1.9 and Fig. X1.1
<i>Child safety barriers for domestic use</i>				
(i)	ASTM F1004-18	ASTM F1004-19 (June 2019)	<ul style="list-style-type: none"> ● To revise the referenced documents; ● To revise the performance requirements; ● To revise the horizontal push-out test to be conducted at the maximum opening width only; ● To revise the marking and labelling requirements; and ● To revise the requirements for instructional literature. 	<ul style="list-style-type: none"> ● 2.4 ● 6 ● 7.9.1.1 ● 8 ● 9

	Current Specified Standards	Updated Standards (Publication/ Effective Date)	Major Changes/Remarks	Affected Clauses
<i>Children's cots for domestic use</i>				
(i)	ASTM F1169-13	ASTM F1169-19 (April 2019)	<ul style="list-style-type: none"> To revise the requirement of warnings to be affixed to the crib. 	<ul style="list-style-type: none"> 8.4
(ii)	ISO 7175-1:1997	ISO 7175-1:2019 (January 2019)	<ul style="list-style-type: none"> To revise the scope, normative references, terms and definitions, requirements on safety, packaging, instructions for use and marking. 	<ul style="list-style-type: none"> 1 to 7
(iii)	ISO 7175-2:1997	ISO 7175-2:2019 (January 2019)	<ul style="list-style-type: none"> To revise the scope, normative references, terms and definitions, requirements on general test conditions, test apparatus, test procedures and test report. 	<ul style="list-style-type: none"> 1 to 6
<i>Children's high chairs and multi-purpose high chairs for domestic use</i>				
(i)	ASTM F404-18	ASTM F404-18a (January 2019)	<ul style="list-style-type: none"> To exempt high chairs and high chair accessories that can be used with only children unable to sit upright unassisted and weigh 20 lb (9.1 kg) or less from the stability requirements in the standard; To add a requirement for warning statement on products that can be used with only children unable to sit upright unassisted and weigh 20 lb (9.1 kg) or less; and To add rationale for the above exemption and the added warning statement. 	<ul style="list-style-type: none"> 6.5.1 8.5.2.2 X1.21, X1.93 and X1.96

	Current Specified Standards	Updated Standards (Publication/ Effective Date)	Major Changes/Remarks	Affected Clauses
Children's paints				
(i)	BS EN 71-3:2013 + A3:2018	BS EN 71-3:2019 (April 2019)	<ul style="list-style-type: none"> ● To revise the terms and definitions; ● To revise the migration limit value for chromium (VI) for Category III material; ● To revise the list of reagents and apparatus; ● To revise the requirements for sampling and sample preparation; ● To revise the migration methodology; ● To revise the stabilization and analysis of migration solutions; ● To revise the calculation of migration; ● To introduce data on method performance based on the results of test method validation and in particular the results of an interlaboratory comparison; ● To revise the requirements on test report; ● To add new informative annexes containing information on <ul style="list-style-type: none"> - method validation, - estimation of reproducibility, and - toy material visual particle size comparison materials; ● To revise the method of analysis for general elements; ● To replace the method for analysis for chromium (III) and chromium (VI) by a method of analysis for chromium (VI); ● To revise the method of analysis for organic tin; and ● To revise the rationale. 	<ul style="list-style-type: none"> ● 3 ● Table 2 ● 6 ● 7 ● 8 ● 9 ● 10 ● 11 ● 12 ● Annex B ● Annex C ● Annex D ● Annex E ● Annex F ● Annex G ● Annex H

	Current Specified Standards	Updated Standards (Publication/ Effective Date)	Major Changes/Remarks	Affected Clauses
(ii)	ISO 8124-3:2010 (incorporating Amendment 1:2014)	ISO 8124-3:2010 (incorporating Amendment 2:2018 (September 2018))	<ul style="list-style-type: none"> To add the maximum acceptable element migration from finger paint. 	<ul style="list-style-type: none"> Table 1
<i>Playpens for domestic use</i>				
(i)	ASTM F406-17	ASTM F406-19 (April 2019)	<ul style="list-style-type: none"> To revise terminology, note and test method. 	<ul style="list-style-type: none"> 3, 7 and 8
<i>Wheeled child conveyances</i>				
(i)	BS EN 1888:2012	BS EN 1888-1:2018 (January 2019)	<ul style="list-style-type: none"> To revise the scope, normative references and terms and definitions; To add the determination of occupant space to the general requirements and test conditions; To revise the requirements on test equipment; To revise requirements and test methods for chemical hazards, shearing hazards, thermal hazards and mechanical hazards; To revise requirements on product information; and To add new informative annexes with information on <ul style="list-style-type: none"> rationales, examples of moving parts of the canopies inside 100 mm from the pivot point, translation of warnings in different European languages, and the arrangement of approval marks for child restraint systems. 	<ul style="list-style-type: none"> 1, 2 and 3 4 5 6 to 8 10.2.9, 10.3 and 10.4 Annex A Annex D Annex E Annex G
		BS EN 1888-2:2018 (January 2019)	<ul style="list-style-type: none"> To provide additional safety requirements and test methods for pushchairs designed for the carriage of one or more children above 15 kg and up to 22 kg each. 	<ul style="list-style-type: none"> 1 to 7 and Annex A & B

	Current Specified Standards	Updated Standards (Publication/ Effective Date)	Major Changes/Remarks	Affected Clauses
(ii)	ASTM F833-15	ASTM F833-19 (April 2019)	<ul style="list-style-type: none"> ● To add a definition for tray/grab bar protective covering to the terminology; ● To add general requirement and test method for tray/grab bar protective covering ; and ● To add the requirement of a warning for tray/grab bar with a removable protective covering. 	<ul style="list-style-type: none"> ● 3.1.25 ● 5.14 and 7.19 ● 8.3