



# Ensuring Safe Play: Global Toy Safety Labeling

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# 01. About The Authors



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Andrew O'Neill is a Compliance Specialist and Subject Matter Expert in Battery Safety, Toys and global regulatory frameworks, with a multidisciplinary background spanning product safety compliance, radio interference investigation, physics, and electronics.

He holds a Bachelor of Science in Physics from Dublin Institute of Technology, complemented by a series of postgraduate diplomas culminating in an MBA from the Irish Management Institute, focused on regulatory management, organizational behavior, and managerial economics.

Andrew's work bridges technical problem-solving with strategic regulatory interpretation, helping organizations navigate complex compliance landscapes while aligning technical innovation with global safety standards.

# 01. About The Authors



**Catherine Burke**  
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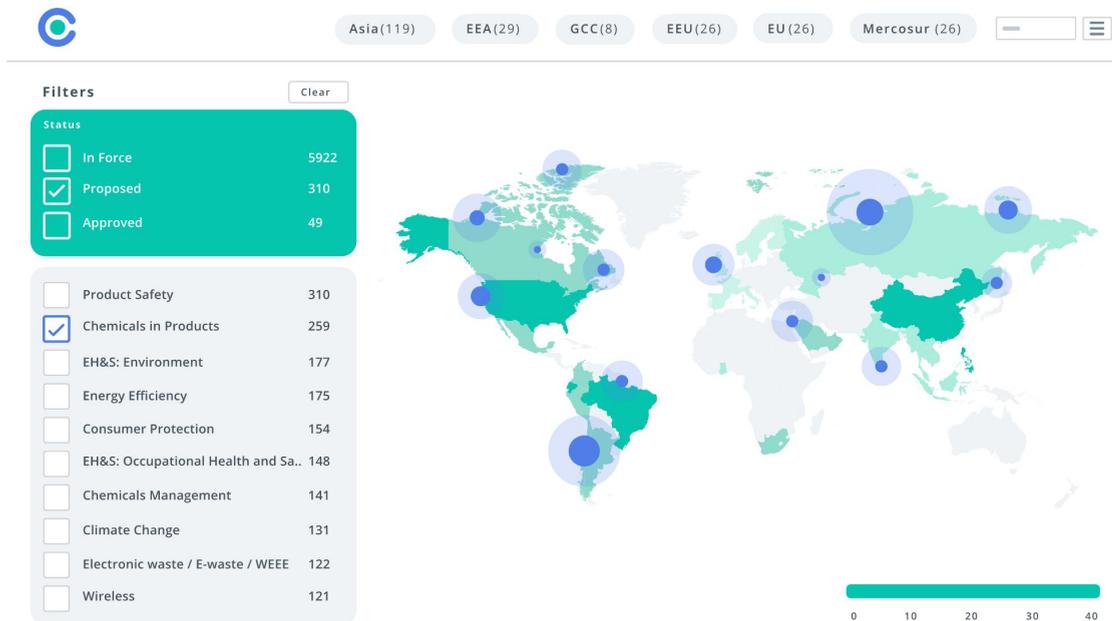
Catherine works as the Quality Assurance Manager on the Global Regulatory Compliance Team at Compliance & Risks where she has the responsibility of ensuring the quality, integrity and accuracy of data. She is also a Subject Matter Expert for Toys.

Catherine has worked with Compliance & Risks for over 13 years. She has implemented and overseen a number of quality assurance measures designed to maintain the desired level of quality in order to provide the best possible product to clients and continues to implement and oversee additional measures.

Catherine has a Bachelor of Arts Degree in Legal Studies and Economics, a Bachelor of Law Degree and Masters in Public Law from University of Galway, complemented by a FETAC Level 5 Certificate in Legal Support Services.

# 02. Unlocking Market Access

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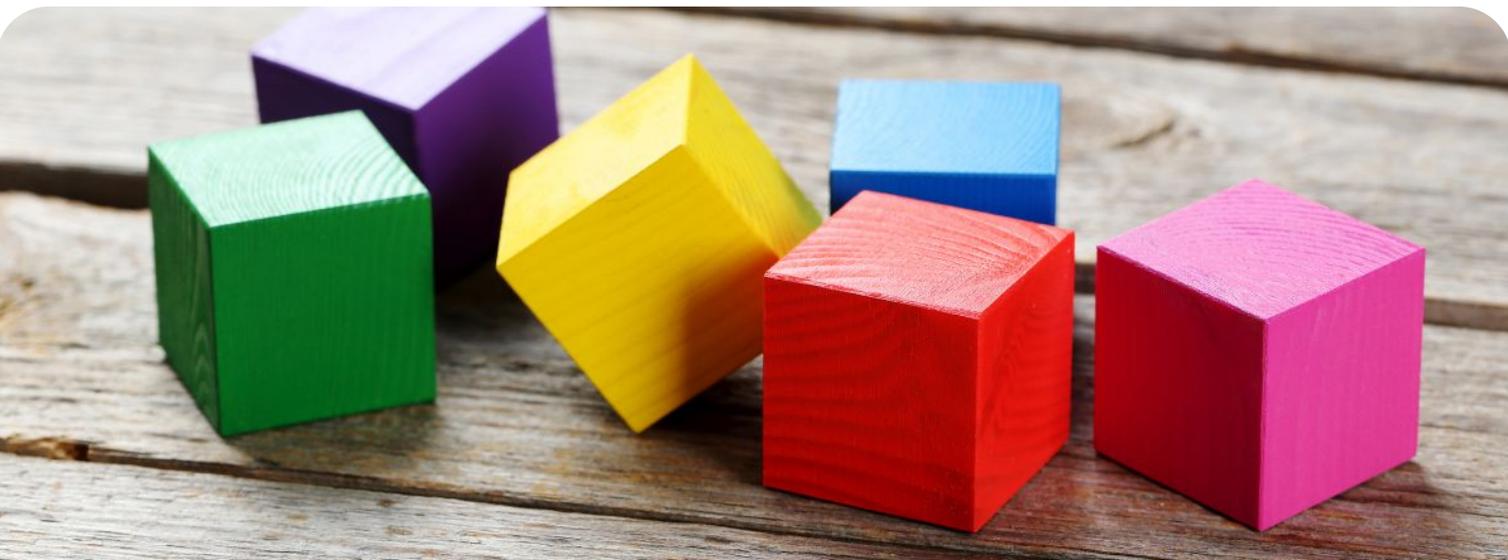
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## 03. Introduction

The global toy industry operates within one of the most complex and closely regulated product categories - reflecting society's highest concern, child safety.

With growing harmonization around international benchmarks such as ISO 8124, ASTM F963, and EN 71, manufacturers increasingly face the challenge of meeting multiple compliance pathways while maintaining efficiency in product design and testing.

This white paper provides an in-depth comparative analysis of toy safety frameworks across major global markets, including:

- The European Union;
- North America;
- Asia;
- Africa; and
- Oceania.

It aims to guide regulatory professionals and manufacturers through the evolving landscape of toy safety labeling.



## 04. European Union

### 4.1. Toy Safety Directive 2009/48/EC

At present, warnings and labeling for toys are regulated in the EU under [Directive 2009/48/EC](#) on the Safety of Toys. The Directive entered into force on 20 July 2009 and has applied since 20 July 2011. It has subsequently been amended several times.

The Directive applies to products that are designed or intended, whether or not exclusively, for use in play by children under 14 years of age.

#### **What type of warnings should be visible on a toy product?**

Article 11 of the Directive relates to warnings. Article 11 states that, where necessary to ensure safe use, the warnings required under Article 10(2) must include appropriate user limitations as outlined in Part A of Annex V of the Directive. Article 10(2) states that toys must not jeopardize the health or safety of users or third-parties when used as intended or in a way that is foreseeable, taking into account the behavior of children. Part A of Annex V states that user limitations are to include at least the minimum or maximum age of the user and, where

appropriate, the abilities of the user. It should also include the maximum or minimum weight of the user and whether the toy should only be used under adult supervision.

Annex V Part B sets out the specific warnings and indications of precautions that are necessary when using certain categories of toys.

#### **Toys that are not intended to be used by children under the age of 3**

- *Warning:* 'Not suitable for children under 36 months' or 'Not suitable for children under the age of 3' or a graphic such as:



- *Instructions:* Warnings should be accompanied by a brief explanation of the hazard that calls for this precaution. This explanation can be included in the instructions for use.

- When the warning does not apply: Toys that are, considering their function, dimensions, characteristics, properties, or other valid grounds, unsuitable for children under the age of 3.

### Activity Toys

- *Warning:* 'Only for domestic use'.
- *Instructions:* Activity toys that are attached to a crossbeam, or other similar activity toys, should be accompanied by instructions that provide for the need for checks and maintenance to be carried out. If these checks are not carried out, the toy may cause a fall or overturn. Instructions should also include details on the correct assembly of the toy, including which parts may present a danger if the toy is incorrectly assembled. Information on a suitable surface on which the toy should be placed should also be provided.

### Functional Toys

- *Warning:* 'To be used under the direct supervision of an adult'.
- *Instructions:* Should be accompanied by working instructions and precautions, and should note that failure to follow these instructions could result in specified hazards that are normally associated with the appliance or product of which the toy is a scale model or imitation. The instructions should also stipulate that the toy must be kept out of reach of children under a certain age, which is to be specified by the manufacturer.

### Chemical Toys

- *Warning (on packaging):* 'Not suitable for children under (\*) years. For use under adult supervision.'
- *Instructions:* Include a warning on

the dangerous nature of substances and mixtures and details of the precautions necessary to avoid specified hazards associated with the type of toy. Include first aid instructions to be given in case of a serious accident resulting from use of this type of toy. The instructions should also stipulate that the toy must be kept out of reach of children under a certain age, which is to be specified by the manufacturer.

### Skates, roller skates, inline skates, skateboards, scooters, and toy bicycles for children

- *Warning (when offered for sale as toys):* 'Protective equipment should be worn. Not to be used in traffic'.
- *Instructions:* Reminder that the toy should be used with caution to avoid falls or collisions that cause injury to the user or a third-party, as use requires skill. Should include an indication of appropriate personal protective equipment.

### Aquatic Toys

- *Warning:* 'Only to be used in water in which the child is within its depth and under adult supervision'

### Toys in Food

- *Warning:* 'Toy inside' Adult supervision recommended'

### Initiation of Protective Masks and Helmets'

- *Warning:* 'This toy does not provide protection'

### Toys intended to be strung across a cradle, cot or perambulator by means of strings, cords, elastics or straps

- *Warning (on packaging that is permanently marked on the toy):* 'To prevent possible injury by

entanglement, remove this toy when the child starts trying to get up on its hands and knees in a crawling position'

### Packaging for fragrances in olfactory board games, cosmetic kits and gustative games

- *(On packaging for products containing any of the following fragrances: Amyl cinnamal, Amylcinnamyl alcohol, Benzyl alcohol, Benzyl salicylate, Cinnamyl alcohol, Cinnamal, Citral, Coumarin, Eugenol, Geraniol, Hydroxycitronellal, Hydroxy-methylpentylcyclohexenecarboxaldehyde, Isoeugenol, Oakmoss extracts, Treemoss extracts, Anisyl alcohol, Benzyl benzoate, Benzyl cinnamate, Citronellol, Farnesol, Hexyl cinnamaldehyde, Lilial, d-Limonene, Linalool, and 3-methyl-4-(2,6,6-trimethyl-2-cyclohexen-1-yl)-3-buten-2-one):*  
'Contains fragrances that may cause allergies'

Toys should not bear any warning that would conflict with the intended use of the toy as determined by the function, dimension, and characteristics of the toy.

Manufacturers should mark the warnings in such a way that they are clearly visible, legible, understandable, and accurate, on a label affixed to the toy or on the packaging and in the instructions, where appropriate. In the case of small toys that are sold without packaging, the warning should be affixed to them. They should be preceded by the word **"Warning"** or **"Warnings."** Where the warning is necessary to determine the decision to purchase the toy (e.g., maximum or minimum age of the user), it should appear on the packaging or be clearly visible to the customer before purchase, including online sales. Warnings should be written in a language or languages easily understood by consumers based on the Member State.

### What are the labeling requirements?

Per Article 4(6) of the Directive, manufacturers are required to indicate their name, registered trade name or registered trade mark and the address at which they can be contacted on the toy. If this is not possible, it should be added on its packaging or in a document accompanying the toy. The address should indicate a single point where the manufacturer can be contacted.

Furthermore, toys are required to bear the CE mark. Toys that bear the CE marking are presumed to comply with the Directive. The CE marking is to be affixed in such a way that it is visible, legible, and indelible on the toy, on a fixed label, or on the packaging. For small toys and toys consisting of small parts, the CE mark can be affixed to a label or an accompanying leaflet. For toys sold in counter displays, where the counter display is used as packaging for the toy, the CE mark can be affixed to the counter. Where the CE marking is not visible from outside the packaging, it should be affixed to the packaging. The CE mark must be affixed before the product is placed on the market. It can be followed by a pictogram or any other mark which indicates a special risk or use.

### What are the labeling requirements of allergenic fragrances?

Part 11 Paragraph 3 of Annex II provides that the names of the listed allergenic fragrances are required to be listed on the toy, on an affixed label, on the packaging or in an accompanying leaflet where the concentration exceeds 100 mg/kg in the toy or component.

The use of the fragrances listed in the Directive are allowed in olfactory board games, cosmetic kits and gustative games.

## What are the labeling requirements for cosmetic toys?

The Directive states that cosmetic toys, such as play cosmetics for dolls, are required to comply with the labeling requirements set out in [Council Directive 76/768/EEC](#) relating to Cosmetic Products. This Directive has since been repealed by Cosmetic Products [Regulation \(EC\) 1223/2009](#). On this basis, cosmetic toys are now required to comply with Regulation (EC) 1223/2009. Article 19 of Regulation (EC) 1223/2009 provides that cosmetic products (in this case, cosmetic toys such as play cosmetics for dolls) must bear the following information on the container or packaging:

- A. The name or registered name and address of the responsible person (abbreviation is allowed if it's still possible to identify the responsible person and their address). If several addresses are provided, the address where responsible person makes the product information file readily available should be highlighted;
- B. The nominal content at the time of packaging, given by weight or volume with the following exceptions:
  - a. The case of packaging contains less than five grams or five millilitres, free samples and single-application packs;
  - b. Pre-packages normally sold as a number of items, for which details of weight or volume are not significant;
  - c. The number of items is easy to see from the outside or if the product is normally only sold individually.
- C. The date until which the cosmetic product continues to fulfil its initial function and remains in conformity with Article 3 ('date of minimum durability'), provided it is stored in appropriate conditions. The date will be preceded by:

## Date of minimum durability



or the words: 'best used before the end of'. The date will consist of either the month and year or the day, month and year, in that order. If necessary, this information will be supplemented by an indication of the conditions that must be satisfied to guarantee the stated durability. This is not mandatory for cosmetic products with a minimum durability of more than 30 months. For these products, there will be an indication that the product is safe and can be used without causing any harm to the consumer. The information is not required where the concept of durability after opening is not relevant, which is demonstrated by:

## Period after opening



- followed by the period (in months and/or years);
- D. Particular precautions that should be observed during use, and at least those listed in Annexes III to VI (Annex III relates to substances which cosmetic products must not contain except subject to the restrictions laid down. Annex IV relates to colourants allowed in cosmetic products. Annex V relates to preservatives allowed in cosmetic products, Annex VI relates to UV filters allowed in cosmetic products) and any special precautionary information during professional use;
  - E. The batch number of manufacture or the reference for identifying the cosmetic product. If this can't be added to the cosmetic product for practical reasons, it only needs to be added to the packaging;

- F. The function of the cosmetic product, unless this is obvious from its presentation;
- G. A list of ingredients. This information can be added to just the packaging. The list should be preceded by the term 'ingredients'. An ingredient means any substance or mixture intentionally used in the cosmetic product during the process of manufacturing. Impurities in the raw materials used and subsidiary technical materials used in the mixture but not present in the final product are not considered to be ingredients. Perfume and aromatic compositions and their raw materials should be referred to as 'parfum' or 'aroma'. The presence of substances should be indicated in the list of ingredients also. The list should be arranged by weight, in descending order. Ingredients with a concentration of less than 1% can be listed in any order after those with a concentration of more than 1%. Ingredients in the form of nanomaterials should be clearly indicated on the list. Their name should be followed by the word 'nano' in brackets. Colorants other than those intended to color hair can be listed in any order after the other cosmetic ingredients. For decorative cosmetic products marketed in several color shades, all colorants other than those intended to color hair can be listed, provided that the words 'may contain' or the symbol '+/-' are added. The CI (Color Index) nomenclature will be used, where applicable.

Part 2 of Article 19 provides that, where it is not possible for practical reasons to label the information mentioned in points (D) and (G) above, the information is to be mentioned on an enclosed or attached leaflet, label, tape, tag or card. Unless it is impracticable to do so, this information shall be referred to by abbreviated information or:

#### Reference to enclosed or attached information



This must appear on the container or packaging for the information referred in point (D) above and on packaging for the information referred in point (G) above.

Part 3 of Article 19 provides that, in the case of soap, bath balls and other small products where it is impossible for the information referred to in point (G) above to appear on a label, tag, tape or card or in an enclosed leaflet for practical reasons, the information is to appear on a notice in immediate proximity to the container in which the cosmetic product is being sold.

The language of the information mentioned in points (B), (C), (D) and (F) and in Parts 2 and 3 above will be determined by the law of the Member States in which the product is being sold.

Labeling should not be used to imply that these products have characteristics or functions which they do not have.

Moreover, Annex V provides that all finished products containing substances that are listed in Annex V and which release formaldehyde are required to be labeled with the warning 'releases formaldehyde' where the total concentration of formaldehyde released in the finished product exceeds 0,001 % (10 ppm) regardless of whether the finished product contains one or more substances releasing formaldehyde.

## 4.2. Safety of Toys Draft Regulation

A repeal of the Toy Safety Directive has been proposed in the form of the [draft Safety of Toys Regulation](#). The draft Regulation was initially proposed on 28 July 2023. The latest revision of the draft was 11 July 2025. The draft was due to be finalized in July and then September of this year but, to date, it has not yet been finalized. However, it was approved by the EU Council on 13 October 2025. The shift from Directive to Regulation means the Regulation will be directly applicable and binding in all Member States.

### Updated warnings

Article 6 of the draft Regulation applies to warnings and, similar to the Toy Safety Directive, provides that toys should bear warnings which specify appropriate user limitations. These user limitations include the minimum age of the user. This is a minor deviation from the Directive, which required the minimum or maximum age of the user. This is the only deviation regarding user limitations with the Directive.

The Regulation does contain some differences from the Directive with regard to warnings.

Annex III sets out the specific warnings that each category of toy should bear. Per Annex III warnings should be preceded by the word 'Warning' or with the following pictogram:



The pictogram should be displayed prominently and does not need to be repeated before each warning. It should be at least 10 mm in black triangle, yellow background and black exclamation mark.

The font size of the warnings should be such that the x-height is equal to or greater than 1,2 mm. There should be a sufficient enough contrast between the print and the background to ensure legibility and visibility, Notwithstanding the foregoing the minimum height of pictograms, which will be not less than 10 mm. Where the warning is added to the packaging or containers where the surface area is 80 cm<sup>2</sup> or less, the x-height of the font size will be equal to or greater than 0,9 mm.

Annex III contains some minor changes regarding the warnings for specific products as outlined below:

### Toys that are not intended to be used by children under the age of 3

- Warning: Minor wording change from the Directive - 'Not suitable for children under the age of 3' changed to 'Not suitable for children under three years'. The graphic is the same as the EU Directive but it should be at least 10 mm diameter in size and shall contain a red circle with a white background and with the text and face in black colour.

### Toys in food

- The warning should be displayed on the packaging of food containing toys or packaging of food co-mingled with toys and should be visible before purchase.

### Packaging for fragrances in olfactory board games, cosmetic kits and gustative games

- Updated list of fragrances on the packaging for olfactory board games, cosmetic kits, and gustative games as follows: Amyl cinnamal, Amylcinnamyl alcohol, Benzyl

alcohol, Benzyl salicylate, Cinnamyl alcohol, Cinnamal, Citral, Coumarin, Eugenol, Geraniol, Hydroxycitronellal, Isoeugenol, Evernia prunastri extract, Evernia furfuracea extract, Anise alcohol, Benzyl benzoate, Benzyl cinnamate, Citronellol, Farnesol, Hexyl cinnamaldehyde, Limonene and Linalool.

Toys that are sold without packaging should have the warnings affixed to the toy if the surface allows, if possible. Where it is not possible to do so, the warning should be placed on the label. Labels and instructions regarding use should draw the attention of children or their supervisors to the hazards and risks to the safety and health of children considering the age group of children the toys are intended for and the ways said hazards and risks can be avoided.

## What are the labeling changes under the new regulation?

The draft Regulation differentiates from the Directive regarding CE marking by removing reference to toys sold in counter displays and the requirement that the CE mark can be affixed to the counter where the counter display is used as packaging for the toy. Additionally, the draft Regulation requires that Member States build upon existing mechanisms to ensure the CE mark is applied correctly and to take action if it's used improperly.

The most significant change with regard to labeling between the Directive and the Regulation is the introduction of a requirement for a digital product passport for toys in the Regulation. A digital product passport is a set of data specific to a toy that contains certain information and that is accessible via electronic means through a data carrier. The information that must be included on the digital product passport is set out in Annex VI of the draft Regulation. The digital product passport should correspond to a specific toy model and should; show that the toy is in compliance

with the Regulation and other essential safety requirements; contain at least the information set out in Part I of Annex VI of the Regulation; be accurate, complete and up to date; be available in the language or languages required by the Member State where the toy is placed on the market; be accessible; be available for a period of 10 years after the toy was placed on the market; and be connected to a persistent unique product identifier through a data carrier. The digital product passport demonstrates conformity with the Regulation.

The data carrier, defined as a linear barcode symbol, a two-dimensional symbol or other automatic identification data capture medium that can be read by a device, should be physically present on the toy or on a label attached to the toy.

Per Annex VI, the digital product passport must contain:

- A unique product identifier of the toy;
- The name and address of the manufacturer and, when applicable, of the manufacturer's authorized representative, along with the unique operator identifier;
- The name and address of the economic operator responsible for carrying out the tasks set out in Article 4 of [Regulation \(EU\) 2019/1020](#) relating to products subject to certain Union harmonization legislation, along with the unique operator identifier;
- A mention that the passport is issued solely under the responsibility of the manufacturer;
- The object of the passport (identification of toy allowing traceability and including a color image of sufficient clarity to enable the toy to be identified);
- The commodity code, where applicable, per [Council Regulation \(EEC\) No 2658/871](#) (the first four digits shall be 9880, the fifth and the sixth digit shall correspond to the Combined Nomenclature chapter to which the goods of the component part belong and the

seventh and the eighth digit shall be 0) under which the toy is classified when the passport is created;

- References to all EU law that the toy complies with;
- A mention that this digital product passport replaces the EU Declaration of conformity under [Regulation \(EU\) 2024/2847](#), [Regulation \(EU\) 2024/1689](#), [Commission Delegated Regulation \(EU\) 2019/945](#), [Directive 2014/53/EU](#), [Directive 2014/35/EU](#), [Directive 2014/30/EU](#), or [Directive 2011/65/EU](#), where applicable;
- References to the relevant harmonized standards used, or references to common specifications in relation to which conformity is declared;
- The notified body name and number which has intervened in the conformity assessment procedure and issued a certificate, as well as the reference to the certificate, where applicable;
- The CE marking;
- A list of allergenic fragrances that are present in the toy and that are subject to specific labeling requirements;
- A communication channel such as a telephone number, an electronic address, a dedicated section of their website;
- A reference of the digital product passport service provider that is hosting a back-up copy of the digital product passport.

Further to that, the digital product passport may contain safety information and warnings and instructions for use.

The digital product passport should be fully interoperable with other digital product passports, such as those required under the [EU Batteries Regulation 2023/1542](#) and the [EU Ecodesign for Sustainable Products Regulation ESPR 2024/1781](#). All data included in the digital product passport should be based on open standards developed with an interoperable format and should be machine readable, structured, searchable and transferable. It is typically in the form of a QR

code. Access should be free. It should be stored by the economic operator who created it or by digital product passport service providers. If a new digital product passport is created for a toy that already has one, it should be linked to the original passport(s). The passport should be designed to ensure security, privacy and fraud prevention. It is prohibited to store personal data related to the customer in the passport.

Per Part B of the Appendix in Annex II, the names of the listed allergenic fragrances are required to be listed on the toy, on an affixed label, on the packaging or in an accompanying leaflet, along with the digital product passport where the concentration exceeds 10 mg/kg in the toy or component.



## 05. North America

### 5.1. United States

**Legal Framework:** In the U.S., toy safety is governed by federal laws and regulations enforced by the Consumer Product Safety Commission (CPSC). The cornerstone is the Consumer Product Safety Improvement Act (CPSIA) of 2008, which made the ASTM F963 toy safety standard a mandatory rule for all toys intended for children 12 years of age or under. As a result, ASTM F963-23 (the latest version, effective April 2024) is the binding safety specification for toys, covering mechanical, physical, flammability, chemical, and electrical hazards. CPSIA also introduced strict limits on toxic substances: for example, lead in surface coatings is capped at 90 ppm and total lead content at 100 ppm in accessible parts, and certain phthalates are banned above 0.1% in toy components. These limits are codified in CPSC regulations and supersede any voluntary standard provisions.

#### **What are the safety and labeling requirements?**

In addition to the general toy standard, the U.S. imposes specific safety rules. Toys intended for children under 3 years cannot contain small parts that could pose

choking hazards. Toys for slightly older children that do contain small parts must carry prominent choking hazard warning labels on packaging (for example: "WARNING: CHOKING HAZARD – Small parts. Not for children under 3 years"). These cautionary labels are mandated by the Federal Hazardous Substances Act and the Child Safety Protection Act for toys and games with small parts, small balls, balloons, or marbles, and the labeling text and format are strictly prescribed. U.S. regulations also require permanent tracking labels on all children's products, including toys, to aid in recalls: toys must be marked with the manufacturer or importer's identity, the production batch, and date/place of manufacture. This information, which must be durable on the product and packaging, helps trace products if safety issues arise. Other labeling requirements include age grading guidelines and instructions when necessary for safe use. Notably, the U.S. also regulates toy firearms imitation (they must have blaze orange tips per 15 CFR 1150), and art materials in toys must comply with LHAMA (Labeling of Hazardous Art Materials Act) for chronic hazards.

## 5.2. Canada

Legal Framework: Canada regulates toys under the Canada Consumer Product Safety Act (CCPSA) and its corresponding Toys Regulations (SOR/2011-17). All toys manufactured, imported, or sold in Canada must meet the broad safety requirements of the CCPSA, which include a general prohibition on products that pose a “danger to human health or safety”. The Toys Regulations set specific safety standards for mechanical hazards (sharp edges, small parts, projectiles, etc.), flammability of certain toys, toxic substances, and other hazards, very much analogous to the scope of ASTM F963 or ISO 8124. For example, the regulations prohibit small parts in toys for children under 3 (using a similar small-parts cylinder test as in other countries) and set limits on certain chemicals. Additional regulations under the CCPSA address specific hazards: there are separate regulations for surface coating materials (limiting lead in paint to 90 mg/kg, and banning harmful metals or asbestos), for phthalates in vinyl toys, for toys that are science education sets, and so forth. Canada’s approach thus layers general toy requirements with targeted rules for certain substances and products. Notably, Schedule 2 of the CCPSA outright bans certain dangerous items (e.g. lawn darts with metal points, baby “teethers” containing fluid that is poisonous, etc.) from sale.

### What are the labeling requirements?

Canada’s toy regulations do not prescribe as many specific warning labels as U.S. law, but there are some important labeling rules. Any toy with a plastic bag packaging (e.g. a toy packed in a plastic bag) must carry a suffocation hazard warning in English and French, e.g. “PLASTIC BAGS CAN BE DANGEROUS. TO AVOID DANGER OF SUFFOCATION, KEEP THIS BAG AWAY FROM BABIES AND CHILDREN.”

Canada’s bilingual labeling policy is significant, while not every choking hazard requires a label by law, Health Canada strongly encourages manufacturers to provide choking warnings in both English and French for toys that pose such risks. For instance, officials recommend a label like “WARNING – CHOKING HAZARD: Small parts...” in both languages if the toy or its components could be choking hazards.

Additionally, Canada’s Consumer Packaging and Labeling Act requires consumer products (including toys) to have basic labeling such as the identity of the product, the net quantity (if applicable), and the dealer’s name and address on the package. This is enforced by the Competition Bureau and is largely about accurate product information rather than safety. In the province of Quebec, the Charter of the French Language requires that all product inscriptions, manuals, and warnings be in French (labels can be bilingual, but French must not be less prominent). Therefore, toy packaging and instructions in Canada are typically bilingual country-wide, and especially must be for Quebec.

## 5.3. Mexico

**Legal Framework:** In Mexico, toy safety is governed by Normas Oficiales Mexicanas (NOMs), which are official mandatory standards. Compliance with relevant NOM standards is required for toys to be imported and sold. Two key NOM standards for toys are NOM-015-SCFI-2007 (which covers commercial labeling requirements for toys) and NOM-252-SSA1-2011 (which establishes toy safety specifications, particularly chemical safety limits). NOM-252-SSA1 sets limits on the bioavailability of heavy metals in toy materials (such as lead, mercury, arsenic, etc. in paints and coatings) and specifies test methods. In essence, it serves a similar purpose to ASTM F963's heavy metal limits or Europe's EN 71-3, ensuring that children are not exposed to toxic elements from toys. NOM-015-SCFI-2007, on the other hand, requires that toys be labeled with certain information in Spanish, including the importer or manufacturer's details, appropriate age rating, safety warnings, and any usage instructions. For example, if a toy contains small parts or is not suitable for children under a certain age, this must be clearly stated on the packaging in Spanish.

### **Evolving standards**

Historically, Mexico did not have a single comprehensive mechanical/physical safety standard for toys like ASTM F963, but it has been updating its regulations. A draft standard PROY-NOM-253-SE-2021 has been under development, aiming to cover mechanical, physical, electrical, and flammability safety for toys in a unified way. This draft (not yet fully in force as of 2025) indicates Mexico's intent to harmonize with international toy safety norms, it lists various categories of toys (from non-powered toys for under 36 months, to electric trains, ride-on toys, rattles, etc.) that would be within scope. Once implemented, NOM-253 will likely align with ISO 8124 or similar standards for mechanical and physical tests

(e.g., drop tests, tension tests, sharp points, etc.), and flammability tests. For now, manufacturers exporting to Mexico ensure compliance with existing NOMs (chemical and labeling) and generally adhere to international safety standards as a best practice in anticipation of NOM-253.

### **Labeling and language**

NOM-015 requires Spanish-language labeling. All safety warnings, age recommendations, and usage instructions on toy packaging in Mexico must be in Spanish (other languages can appear, but Spanish is mandatory). The label must also include the importer's Mexican address and RFC (tax ID), reflecting accountability. Mexico also follows international practices for specific hazards: for example, toys with small parts intended for older children should have a warning like "No es apto para menores de 3 años – contiene piezas pequeñas" (not suitable for under 3, contains small parts). The emphasis is on clear consumer information to enable safe use.



## 06. Asia

### 6.1. China

Legal Framework and Standards: China has one of the most stringent toy compliance regimes in Asia, driven by both national standards and a government-run certification program. The fundamental standards for toy safety in China are captured in GB 6675-2014, a set of compulsory national standards that replaced the older 2003 version and became effective January 1, 2016. GB 6675-2014 is structured into four parts:

1. **GB 6675.1 (Basic Code):** General requirements, definitions of toy categories, and overarching safety principles, including the obligations of manufacturers/importers and the role of regulators.
2. **GB 6675.2 (Mechanical and Physical Properties):** Detailed criteria similar to ISO 8124-1 for hazards like small parts, sharp edges, projectiles, moving parts, etc., and it introduced specific requirements for acoustics (toy noise levels) and magnets in toys.
3. **GB 6675.3 (Flammability):** Requirements to ensure toys are

made of materials with acceptable flammability properties, addressing scenarios like toy costumes or toys a child can enter (tents) these are analogous to ISO 8124-2 or EN71-2 and prohibit highly flammable materials in toys.

4. **GB 6675.4 (Migration of Certain Elements):** This part, based on ISO 8124-3, sets maximum permissible levels for toxic elements (lead, mercury, arsenic, selenium, etc.) that can migrate from toy materials if sucked, ingested, or contacted. For example, the lead migration limit is similar to international norms to prevent heavy metal poisoning.

In addition to the GB 6675 series, China has specific standards for certain toy types (e.g. GB 19865 for electric toys safety, analogous to IEC 62115) and mandatory standards for labeling of toys (GB 5296.5 specifies the required warning and information labels on toys, such as age grading and instructions in Chinese).



## China Compulsory Certification

A critical aspect of China's system is the China Compulsory Certification (CCC) scheme, a government-administered product certification program. Many categories of toys are included in the CCC scheme (for instance, electric toys, plastic toys, metal toys, dolls, and ride-on toys are explicitly listed). Manufacturers of these toys must obtain a CCC certificate and mark before the products can be imported into or sold in China. The GB 6675 Basic Code (Part 1) outlines that toys in scope must meet CCC requirements, meaning they must be tested by designated laboratories in China and certified by authorized certification bodies (such as CCIC or CQC). Once certified, the toy will bear the CCC mark, which is a logo printed on the product or packaging indicating compliance. No toy in a CCC-applicable category can be legally distributed in China without this mark. Customs will deny entry to shipments of toys lacking CCC certification, and domestic factories cannot release them for sale.

## Labeling and warnings

Chinese regulations require that toy packaging and leaflets provide certain information in Simplified Chinese. This includes the toy's name, suitable age range, instructions for use, safety warnings, and the name and address of the Chinese manufacturer or importer. For example, if a toy is not suitable for children under 3 due to small parts, the packaging must state "3岁以下儿童不宜使用" (not suitable for children under 3 years) or a similar warning, and often they use a red "3-" symbol. The GB 6675 Basic Code also gives specific phrasing for warnings on particular toy types; e.g., chemical experiment kits must have a caution like "Warning! Not suitable for children under X years. To be used under adult supervision." on the packaging. All labels must be legible and conspicuous. Toys sold in China also typically include the CCC mark on the packaging as part of labeling, along with an indication of the standard (GB 6675) they comply with.

## 6.2. Japan

**Legal Framework:** Japan's toy safety oversight combines government regulation for basic health aspects with a robust voluntary industry standard for comprehensive safety. Legally, the Japan Food Sanitation Law (JFSL) covers certain safety aspects of toys, particularly for younger children. The JFSL has provisions (often cited as Section 4 of the JFSL and related ordinances) that set standards for chemical and material safety in toys intended for children up to around 6 years old. For example, pacifiers, teething toys, or toys that infants are likely to put in their mouths must not contain harmful substances (such as lead, toxic plastics, etc.) as per JFSL specifications. Compliance with JFSL is mandatory; these requirements function similarly to a technical regulation focusing on materials in contact with food or mouth. The Ministry of Health, Labor and Welfare (MHLW) approves laboratories (including some foreign labs) to test toys for JFSL compliance.

In addition to the JFSL, Japan has the ST Standard (Safety Toy Standard), which is a comprehensive toy safety standard maintained by the Japan Toy Association (JTA), a non-governmental industry body. The ST Standard is voluntary but widely adhered to. It covers mechanical/physical safety (Part 1, aligned in large part with ISO 8124-1 mechanical tests), flammability (Part 2, aligned with ISO 8124-2), and chemical safety (Part 3, including limits on lead, cadmium, and specific banned substances). The latest version (e.g. ST 2016 or ST 2020 series, recently updated to ST 2025) is regularly revised to keep in step with international norms and emerging issues (e.g. new phthalates or magnets hazards).

### ST Mark Certification

The hallmark of Japan's toy safety is the ST Mark program. While not a legal requirement,

toys that carry the ST Mark are trusted by retailers and consumers as safe. In practice, most major toy companies in Japan will only market toys with ST certification, and large retailers prefer or even require it. To obtain the ST Mark, a toy must be tested by a JTA-accredited laboratory (which may be in Japan or overseas labs recognized by JTA) and shown to conform to all parts of the ST Standard. The process usually works as follows: the importer or manufacturer applies to JTA (or via an authorized lab like SGS, BV, etc.), the toy is tested to ST Part 1-3 requirements, and if compliant, the company is granted a license to use the ST mark logo on that product. The ST mark is a triangular symbol with "ST" that is placed on the product packaging. It signals that the toy not only meets mandatory requirements (like JFSL) but also the broader safety considerations of the ST Standard. Notably, the ST program also requires factories to have certain quality control processes, adding an extra layer of assurance. The ST Standard covers toys intended for children up to 14 years old (mirroring the definition of a toy as under 14). By contrast, the Food Sanitation Law's toy provisions mainly apply to toys for younger children (under 6) or those intended to contact the mouth. Therefore, an electronic toy for a 10-year-old might not fall under JFSL, but it would still be expected to meet ST standard if the maker wants to use the ST mark.

### Labeling

Japanese regulations require that toys (or their packaging) be labeled in Japanese with the appropriate age grading ("対象年齢" – e.g. 3歳以上 for age 3+), any specific hazard warnings, and the importer's or manufacturer's name and address in Japan. If a toy is ST-certified, the ST mark on the package itself fulfills much of the communication of safety. For certain toys, there are specific warnings: for example,



balloons or toys containing latex must have a choking warning; magnetic toys must warn of swallowing hazards. These are often recommended by JTA or required by the ST standard rather than by law. However, the Consumer Product Safety Act of Japan gives the government recall powers if a product is found to be unsafe. There are also a few categories of toys that fall under Japanese technical regulations beyond JFSL for example, toy fireworks or BB guns have separate laws.

## 6.3. India

Legal Framework: India has in recent years significantly tightened its toy safety requirements. The key development was the issuance of the “Toys (Quality Control Order) 2020”, under India’s Bureau of Indian Standards (BIS) Act. This order made it mandatory that all toys (for children under 14 years) manufactured in or imported into India conform to Indian Standards and be certified by BIS. In other words, as of 2020–2021, toys in India cannot be sold without the ISI mark (Indian Standards Institute mark, now the BIS mark) indicating compliance. This effectively moved toy safety from a mostly unregulated space to a strictly regulated one. The applicable standards are IS 9873 (which is an Indian adoption of ISO 8124 parts 1,2,3 etc. for mechanical, flammability, chemical safety) for non-electrical toys, and IS 15644 (similar to ISO 8124-7/EN62115) for electric toys. The Quality Control Order lists these standards and makes them compulsory.

### **BIS certification process**

To obtain the BIS mark for toys, both domestic and foreign manufacturers must go through the BIS certification scheme. Foreign manufacturers specifically have to use the Foreign Manufacturers Certification Scheme (FMCS) of BIS. The process involves: application to BIS, submission of product samples for testing in BIS-approved laboratories in India, a factory audit by BIS inspectors, and implementation of a BIS-approved quality control system. Only after successful testing and inspection will BIS grant a license, and then the manufacturer can put the ISI/BIS mark on the toy. The BIS mark on toys is usually a standard logo with the BIS license number. This certification must be renewed periodically (licenses are generally valid for 1 or 2 years and then renewable). Importers in India must ensure the overseas factories they source from have this BIS certification; otherwise, the goods will not be cleared at

customs. In fact, Indian Customs will not allow the import of toys without a BIS license number. This has been strictly enforced from January 2021 onward, with only a few exceptions (e.g., toys used for exhibition or samples for testing can be imported with special permission).

### **Labeling**

In addition to the BIS mark, toys in India must comply with general labeling rules like listing the manufacturer’s name and address, country of origin (important since India emphasizes “Made in country X” on products), and relevant safety warnings in English (and/or Hindi). There isn’t a specific equivalent to the EU “CE marking + warnings” system, but effectively the BIS mark serves as proof of conformity. Age grading and warnings (like “Not for under 3 years”) are expected to be on toys where appropriate these come from the standards themselves, which require those labels (ISO 8124-1, which IS 9873 adopts, mandates age warnings for certain toys, and BIS enforces that).



## 6.4. South Korea

South Korea enforces toy safety through the Special Act on Safety of Children's Products, which covers toys among other juvenile products. Under this law, all toys intended for children under 14 years must comply with applicable safety standards and obtain the KC Mark (Korea Certification) prior to sale. The KC mark is South Korea's national conformity mark, introduced to unify previous separate certification systems. Toys fall into different categories under the act: some are designated as "Safety Certification" items, others as "Safety Confirmation" items, depending on risk level. For example, baby toys or electrically operated toys may require full Safety Certification (which involves a factory audit and product testing by Korean authorities), whereas some low-risk toys might go through Safety Confirmation (self-declaration after testing). In either case, a third-party test from an authorized lab in Korea is required, and the product must be registered with the Korean Agency for Technology and Standards (KATS) or relevant authority to get the KC mark.

### **KC mark and labeling**

Once approved, the toy must bear the KC mark label, which includes the KC logo and the certification number. The label is usually required to be permanent on the product or, if not feasible, on the packaging, and must be in Korean. In addition, toys in Korea must have Korean-language warnings and age labeling. For example, if a toy has small parts and is not for under 3, it should have the equivalent Korean text warning. Instructions should be provided in Korean as well. The KC mark effectively assures consumers that the product has met all safety criteria. All toys sold in Korea are required to affix the KC Mark, selling a toy without it is illegal.

## 6.5. Other Asian Markets

Many other countries in Asia have toy safety regulations inspired by either the ISO 8124 international standards or the European and American models.

### **Taiwan (Chinese Taipei)**

Maintains its own CNS toy safety standards (similar to ISO 8124) and requires mandatory testing and certification for certain toys. Taiwan has a certification mark (the Commodity Inspection Mark) for toys that pass testing by the Bureau of Standards, Metrology and Inspection (BSMI). Phthalates in toys are regulated by CNS 15138, and labeling must be in Chinese. Taiwan's regime is somewhat similar to Korea's in requiring pre-market approval.

### **Hong Kong**

Does not have unique toy regulations and instead accepts toys that comply with ASTM F963, ISO 8124, or EU EN 71 standards. The Toys and Children's Products Safety Ordinance in Hong Kong essentially mandates compliance to one of those international standards. Therefore, manufacturers have flexibility, and no additional certification mark is needed for Hong Kong; it relies on post-market surveillance.

### **Malaysia**

Adopts MS ISO 8124 standards as Malaysian Standards for toys. These are technically voluntary, but Malaysia's regulator can enforce them under consumer protection laws. Malaysia currently does not require a pre-market certificate specifically for toys; however, importers must ensure compliance and might have to provide test reports if requested.

### **Singapore**

Has no mandatory toy certification; it refers importers directly to ISO 8124 and EN 71 as the benchmarks. Essentially, compliance with international standards is expected (and large retailers often demand proof of such compliance), but the government doesn't issue a local certificate. General consumer protection law would apply if a toy is unsafe.

### **Thailand**

Implements compulsory standards for toys through the Thailand Industrial Standards Institute (TISI). TIS 685-2540 is the Thai Industrial Standard for Toys (Parts 1-3) and is mandatory. Importers need to get a TISI license for the toy; the standards are based on older ISO 8124 versions. Thailand thus requires a certification logo (the Thai Standard Mark) on toys, achieved through testing and sometimes factory audit.

### **Indonesia, Vietnam, Philippines**

These countries currently have less developed specific toy regulations, but generally they align with either EN 71 or ASTM F963. For instance, Indonesia often references international standards and has broad consumer protection laws. The Philippines Bureau of Standards has published PNS (Philippine National Standards) for toy safety aligning with ISO 8124, and while not strictly enforced at customs yet, there is movement toward more oversight. Importers in these markets typically follow international standards voluntarily and may need to meet labeling requirements (like bilingual labels in the Philippines, English and Filipino).

In summary for Asia (excluding major players above), a common trend is increasing harmonization with ISO 8124.



## 07. Africa

Regulation of toy safety in Africa varies widely across the continent, but a common approach is emerging: many African nations require proof of conformity to international standards at the point of import. Rather than each country developing unique toy standards, they often reference established standards (ISO 8124, EN 71, etc.) and use import inspection programs to enforce them.

### Labeling

The import conformity programs check labeling. Typically, they require that toys have appropriate age warnings and instructions in either English or French (depending on the country's official language).

For example, in anglophone Africa (Kenya, Nigeria, Ghana, etc.), labels should be in English; in francophone countries (like Senegal, Ivory Coast), French labeling is needed. Additionally, many African countries insist that the manufacturer's name and address and the country of origin be clearly marked on the toy or packaging, as a measure against counterfeit or sub-standard goods.



## 08. Australia and New Zealand

Australia has a well-defined regulatory system for toy safety, largely enforced under the Australian Consumer Law (ACL) and implemented via mandatory safety standards declared by the Australian government (through the Australian Competition and Consumer Commission, ACCC).

There are currently five mandatory toy safety standards in Australia, each targeting a specific hazard category or toy type:

- Toys for Children Up to and Including 36 Months of Age addresses choking and ingestion hazards from small parts.
- Children's Projectile Toys addresses eye injuries or impact injuries from projectile-launching toys.
- Toys Containing Magnets addresses the severe internal injury risk if powerful magnets are swallowed (in effect since 2020).
- Aquatic Toys covers flotation or water toys to ensure they carry warnings about drowning risk, etc.
- Toy Materials and Heavy Elements limits the presence of lead and other toxic elements in toy substrates and finishes.
- These standards are law; non-compliance is an offense under the ACL.

### Alignment with international standards

A key aspect is that Australia's mandatory standards are largely aligned with international standards (ISO, EN, ASTM), often accepting compliance with any one of a set of standards. For example, the 2023 safety standard for toys under 36 months explicitly allows compliance if the toy meets certain clauses of AS/NZS ISO 8124.1:2023, or the equivalent clauses of EN 71-1:2014+A1:2018 or ASTM F963-17, as listed in the regulation. This means a manufacturer can choose a pathway (European, American, or the local Australian/New Zealand standard which mirrors ISO) to demonstrate the toy's safety for mechanical/physical hazards. Australia and New Zealand jointly publish standards (AS/NZS) that typically adopt ISO 8124 with minor modifications, ensuring that if you test to AS/NZS, you're essentially meeting ISO. The mandatory standards often reference only certain clauses of those standards focusing on the most critical points like small



parts, sharp edges, etc., rather than the entirety of the standard. In practice, however, most companies will test to the full standard (e.g., EN 71-1) to be safe.

## Labeling and other requirements

Australia requires that certain toys carry specific warning labels. For example, toy packaging for under-3 toys often has an age grading. If a toy is not suitable for below 3, it should say so (this is not strictly mandated except for certain types like the foam toys or balloon toys, but it's considered best practice and could fall under general product information requirements). Toys like flotation toys or pool toys must have a warning such as "WARNING: Aquatic toy – Use only under supervision" per the aquatic toys standard. If a toy contains small magnets, it likely must have a warning label like "This product contains small magnets" and a statement about the hazard. Australia also has a ban on certain items like yo-yo water balls (due to strangulation risk) and very strong magnets sold as adult "desk toys" – those are separate regulatory actions.

## New Zealand

It's worth noting that New Zealand usually mirrors Australia. New Zealand's product safety regime is very similar and often automatically adopts Australian mandatory standards. For toys, New Zealand tends to enforce the same requirements for under-36-months toys, etc. through its own regulatory notices (since the two countries coordinate via a mutual arrangement). For simplicity, companies treat Australia/New Zealand as a single market for compliance, often termed "ANZ". They test to AS/NZS standards and label accordingly. Therefore, mentioning New Zealand: its standards are identical (AS/NZS 8124 series) and NZ's enforcement is by the NZ Commerce Commission in line with the Australian ACCC.



## 09. Conclusion

Globally, toy labeling has evolved into a critical instrument for ensuring both consumer transparency and child safety, with jurisdictions increasingly converging on clear, harmonized requirements while retaining distinct national nuances.

The European Union continues to refine precision through its forthcoming Toy Safety Regulation and digital product passport, while North America prioritizes traceability and explicit hazard communication, and Asia enforces stringent pre-market certification paired with localized language and age-grade labeling.

Across Africa and Oceania, emphasis lies in conformity to international standards such as ISO 8124, EN 71, and ASTM F963, ensuring consistent global recognition. Together, these frameworks reflect a unified shift toward more informative, durable, and multilingual toy labelling - transforming labels from simple warnings into vital compliance tools that safeguard children and build global consumer confidence.

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