



Toy Safety Standards: An aligned and risk-based approach

Joan Lawrence

Sr. Vice President, Standards and Regulatory Affairs
and

Alan Kaufman

Sr. Vice President, Technical Affairs



The Toy Association

- Trade association for North American-based manufacturers, importers, licensors and toy retailers (regular members)
- Associate members include inventors, designers, testing labs
- Formed in 1916
- Over 900 members
- Canadian Toy Association is an affiliate
- Represents approximately 85% of the North American toy market

The Toy Association:

Examples of some of the brands among our 900+ members





A Long History of Leadership in Standards Development and Toy Safety

TOY SAFETY: THE TOY INDUSTRY'S #1 PRIORITY

For over 70 years, the Toy Industry Association (TIA) and its members have been leaders in toy safety and ensuring safe play:



1930s	1940s	1950s	1970s	1980s	1990s	2000s	2010+
<p>Established the TIA Safety Standards Committee</p> <p>Began a partnership with the National Safety Council</p>	<p>Collaborated with National Safety Council to establish a National Accident Reporting Service</p>	<p>Worked with National Safety Council to create the National Injury Information Clearinghouse</p> <p>Joined with American National Standards Institute to develop a standard for toy coating finishes</p>	<p>Led the development of the world's first comprehensive toy safety standard (now known as ASTM F963)</p> <p>Worked with American Academy of Pediatrics and others to create the small parts standard, now used worldwide</p> <p>Launched a program to educate manufacturers about toy safety standards</p>	<p>Collaborated on standards limiting heavy metals in toys</p>	<p>Instituted a program to educate foreign producers about U.S. toy safety requirements</p> <p>Partnered with other organizations in programs to promote the alignment of global toy safety standards—recognizing the importance of ensuring the safety of children at play everywhere.</p>	<p>Worked with legislators to adopt enhanced, uniform toy safety laws and require mandatory compliance and testing for all products sold in the U.S.</p> <p>Created a standard to eliminate the ingestion hazard posed by certain small magnets in toys, now federal law</p> <p>Partnered with key stakeholders to develop and promote toy safety compliance best practices across the industry</p>	<p>Developed www.PlaySafe.org as a free online resource for families on safe toys and play</p> <p>Recognized for efforts in toy safety as members of the ASTM Subcommittee on Toy Safety, which received the CPSC Chairman's Commendation Circle Award for "protecting countless consumers"</p>



Overview

- Background on The Toy Association and the North American toy industry
- The Benefits of Standards Alignment
- International Standards for Toy Safety
- Toy Safety Standard ASTM F963
- Good Regulatory Practices



Toy Industry Initiatives Related to Standards



- **Leadership** in ongoing standards development
- Strengthening process controls throughout the manufacturing process to assure conformance to standards
- **Monitoring incident data** to inform development of new standards in response to emerging hazards
- **Alignment of toy standards**
- **Industry and consumer education**





Standards Alignment

- Truly international standards are developed in a multi-stakeholder, open process, without restrictions based on nationality or region

- Examples of International standards for Toy Safety

- ISO Standard 8124

- ASTM F963

- Numerous examples of countries or regions recognizing one of these international standards and of Collaboration on standards between countries/regions, standards bodies (Australia/NZ, China; APEC Toy Safety Initiative, US-Canada,



(MOUs and incorporation by reference)

Principles of Standards Alignment and Good Regulatory Practice



- Requirements should be **risk-based**, designed to address **demonstrated risk**
- Developed in an **open, transparent process**, with **input from all affected stakeholders**
- **Aligned with international standards**, whenever possible
- Standards and regulatory actions should **meet societal and market needs and should not act as barriers to trade.**
- Consistent with the globally accepted standardization **principles of the World Trade Organization Barriers to Technical Trade Agreement (WTO TBT)**



Benefits of Standards Alignment

- Produce safe products at **reduced cost of production and testing**
 - Cost savings passed along to consumers
- Opens markets
 - Greater product availability **across multiple markets, with reduced technical barriers to trade**
- **Greater coordination**, simplification, understanding of requirements **mean greater product safety**
 - **Consistency in interpretation and comparison of results**
 - **Closer cooperation and enforcement across borders**
 - **Reduced potential for confusion and mistakes/ unsafe products**





Strengths of ASTM F963 Toy Standard

- **Open process** – anyone with an interest may participate
- **Consensus standard** -- Developed and reviewed by 285-member multi-stakeholder expert committee:
 - Includes medical and child development experts
 - Government, industry, testing labs, consumer reps
- **Balance** – no one interest category may dominate.
- Representatives from nearly **20 countries** currently
- Main committee on **Consumer Products**: 1000 members, over 20 types of children's products, in addition to toys



Strengths of ASTM F963 Toy Standard

- **Scope and breadth** – covers toys intended for children up to 14 years of age
- **Risk-based. Reliant on data and science**
- **Includes over 100 standards and tests for toy safety**
 - Mechanical and physical hazards (small parts, sharp edges, projectiles, etc.)
 - Chemical and material safety
 - Flammability
 - Battery and magnets safety
 - And more





Strengths of ASTM F963 Toy Standard

● Has led the way on addressing hazards -- **a major strength of the ASTM process is the ability to respond quickly to incident data to address potential emergent hazards* (e.g., magnets, spherical-shaped impaction hazards, cup-shaped toys, battery ingestion issues/inaccessibility of batteries, jaw entrapment, etc.)

● Mandatory for all products to be sold in the U.S.

● ASTM F963 standard is **recognized and/or emulated by various other countries and regions**

● The “special case” of children’s product safety



WTO Principles of Good Regulatory Practice



- Existing international standards and accreditation schemes should be **considered and evaluated** for their ability to achieve desired regulatory outcomes before other approaches are considered.
- Benefits of alignment** (consumer protection and other benefits, facilitation of trade, openness of markets) with existing standards either globally or regionally – **must be weighed against the perceived incremental benefits of adopting a differing standard.**
- Similarly, **costs to business and consumers** of demonstrating compliance (additional testing, redundant compliance) **must also be weighed against the benefits**



WORLD TRADE
ORGANIZATION



Concluding Thoughts

- Compliant toys sold in all major markets are acceptably safe, but when regulations differ – these differences often *typically do not improve safety*, but only result in additional costs.
- Adoption of an existing international standard is the preferred approach for optimum safety, minimizing costs, and maximizing consumer benefits.
- Of the existing international standards, ASTM F963 is clearly a superior choice:
 - provides a high level of protection for children
 - includes continual review/reliance upon incident data, via open process
 - while minimizing compliance costs

● Some other standards not only mandate needless (and needlessly



Concluding Thoughts

- Existing international standards and accreditation schemes (e.g. ILAC testing accreditation) provide models for optimum safety, minimized costs, and maximized consumer benefits. We encourage alignment.
- Unaligned standards, or redundant testing and certification schemes, create needless barriers to trade and increase costs – and importantly, do not necessarily improve consumer protection.
- We encourage collaboration on children's product safety.
- The importance of multi-stakeholder participation:
 - a Wealth of information on children's product safety
 - Consumer and industry input is integral and has a role in ensuring safety.



Resources

 www.toyassociation.org

 Consumer Product Safety Commission:
www.cpsc.gov

 Consumer information: www.PlaySafe.org





Thank you!

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SVP, Standards & Regulatory Affairs

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jlawrence@toyassociation.org

Alan Kaufman

SVP, Technical Affairs

The Toy Association

akaufman@toyassociation.org