



Inspiring Generations of Play

1200 G Street NW • Suite 200 • Washington, DC 20005

t. 202.459.0354 • e. info@toyassociation.org

April 8, 2024

State Administration for Market Regulation of the People's Republic of China  
(Standardization Administration of the P.R.C.)  
No.9 Madian Donglu,  
Haidian District  
Beijing, China  
100088

**VIA U.S. TBT enquiry point**

***RE: Notification G/TBT/N/CHN/1794, 1795, 1796, and 1797 – National Standard of the P.R.C., Safety of Toys***

Dear Sir/Madam:

These comments are provided on behalf of The Toy Association in response to China's four notifications to amend its national standard for toys that was issued to the World Trade Organization on February 9, 2024. The notifications include:

- G/TBT/N/CHN/1794 - Safety of Toys - Part 1: Basic code
- G/TBT/N/CHN/1795 - Safety of Toys - Part 2: Mechanical and physical properties
- G/TBT/N/CHN/1796 - Safety of Toys - Part 3: Flammability
- G/TBT/N/CHN/1797 - Safety of Toys - Part 4: Migration of certain elements

We appreciate the opportunity to comment on the Standardization Administration of China's (SAC) proposed update to its toy standards. Toys are sold globally with generally the same specifications, facilitated by an increasingly aligned set of international standards and norms to address the safety of the products, reduce risks to consumers, and reduce the impact on the environment. Safety is a paramount concern for the U.S. toy industry, as evidenced by the fact that the industry and The Toy Association have been global leaders in toy safety for decades. The Toy Association continues to work with medical experts, governments, consumers, and industry to provide technical input to ensure that the ISO 8124, EN71, ASTM F963, IEC 62115, and other international and domestic standards/regulations keep pace with innovation and potential emerging issues and are aligned as closely as possible, taking into consideration legal mandates.

The Toy Association and our member companies commend SAC's efforts to seek out greater alignment including its proposed update of GB 6675 to align more closely with the current revisions of the ISO 8124 series standards. The proposed amendments are encouraging; however, there are a few provisions that require further clarification. Without further amendment some of the provisions may eventually pose a potential barrier to trade and thus be inconsistent with WTO TBT principles. Again, we support SAC's intent, but we respectfully request further consideration on two specific matters, this includes:

**Azo dyes:** The proposal includes new restrictions on Azo dyes that go well beyond international regulatory norms. As currently proposed, SAC’s requirement of 24 forbidden amines with a threshold of 20 ppm each is more stringent than requirements detailed under EU’s REACH Annex XVII <sup>1</sup>. We recommend that SAC adjust its proposed approach and align with the existing European requirements.

**Projectiles and Imitation Firearms:** The Toy Association welcomes the revision of GB 6675-2 Section 4.81 to align with the current projectile requirements of ASTM F963 and ISO 8124-1, including the recognition for a consistent kinetic energy density (KED) requirement of 2,500 J/m<sup>2</sup> (which also aligns with EN7101). Considering the revised KED requirement, The Toy Association requests SAC to review the new requirement in Safety of Toys Part 1: Basic Code Section 5.1.12 regarding “imitation firearms” which specifies that “Similar simulated weapon toys should not be recognized as simulated guns by the Ministry of Public Security Simulated Gun Recognition Standard”<sup>2</sup>. Within that referenced standard, Section 1 uses the previous 1,800 J/m<sup>2</sup> parameter. We recommend that SAC clarifies its proposed amendment to ensure that consistent parameters are being applied for “imitation firearms”, either through an update to the referenced standard or to explicitly include the 2,500 J/m<sup>2</sup> KED threshold as the applicable upper parameter as part of the note in GB 6675-1.

Again, the toy industry welcomes SAC’s proposed update to its toy standard and appreciates this opportunity to identify areas where additional clarification needs to be incorporated into the standard to avoid confusion and facilitate greater alignment. As SAC works to update its toy standard, we would be pleased to offer any assistance. Please do not hesitate to contact me or my colleague Joan Lawrence if you have questions or would like further information. I can be reached at [jhuxley@toyassociation.org](mailto:jhuxley@toyassociation.org), and Ms. Lawrence at [jlawrence@toyassociation.org](mailto:jlawrence@toyassociation.org).

Sincerely,



Jos Huxley  
Senior Vice President, Technical Affairs

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<sup>1</sup> ECHA – European Chemicals Agency - REACH Annex XVII – Substances Restricted Under REACH – Website: <https://echa.europa.eu/substances-restricted-under-reach>

<sup>2</sup> P.R.C. Ministry of Public Safety – Standards for the Identification of Imitation Guns 2008-02-27 Website: [https://www.gov.cn/zwgk/2008-02/27/content\\_902728.htm](https://www.gov.cn/zwgk/2008-02/27/content_902728.htm)

**About The Toy Association and the toy industry:**

The Toy Association is the North American based trade association; our membership includes more than 900 businesses – from inventors and designers of toys to toy manufacturers and importers, retailers, and safety testing labs – all involved in bringing safe, fun toys and games to children. The toy sector is a global industry of more than US\$90 billion annually, and our members account for more than half this amount.

Toy safety is the top priority for The Toy Association and its members. Since the 1930s, we have served as leaders in global toy safety efforts; in the 1970s we helped to create the first comprehensive toy safety standard, which was later adopted under the auspices of ASTM International as ASTM F963. The ASTM F963 Toy Safety Standard has been recognized in the United States and internationally as an effective safety standard, and it serves as a model for other countries looking to protect the health and safety of their citizens with protective standards for children.

The Toy Association is committed to working with legislators and regulators around the world to reduce barriers to trade and to achieve the international alignment and harmonization of risk-based standards that will provide a high level of confidence that toys from any source can be trusted as safe for use by children. Standards alignment assures open markets between nations to maximize product availability and choice.