

# Nordic Swan Ecolabelling for **Toys**



Version 3.0 • date – date  
**Consultation document**

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This document is a translation of an original in Danish. In case of dispute, the original document should be taken as authoritative.

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## Addresses

In 1989, the Nordic Council of Ministers decided to introduce a voluntary official ecolabel, the Nordic Swan Ecolabel. These organisations/companies operate the Nordic Ecolabelling system on behalf of their own country's government. For more information, see the websites:

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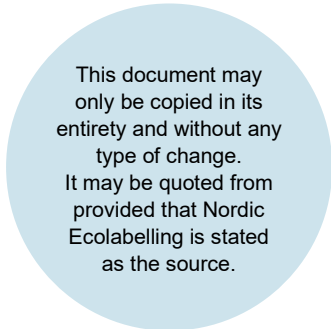
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## Why choose the Nordic Swan Ecolabel?

- Producers or brand owners may use the Nordic Swan Ecolabel trademark for marketing. The Nordic Swan Ecolabel is a very well-known and well-reputed trademark in the Nordic region.
- The Nordic Swan Ecolabel is a simple way of communicating environmental work and commitment to customers.
- The Nordic Swan Ecolabel clarifies the most important environmental impacts and thus shows how a company can cut emissions, resource consumption and waste management.
- Environmentally suitable operations prepare for future environmental legislation.
- Nordic Ecolabelling can be seen as providing a business with guidance on the work of environmental improvements.
- The Nordic Swan Ecolabel covers not only environmental issues but also health requirements, which are particularly important for toys. Children are more vulnerable and also tend to be in close contact with their toys, which increases the risk of effects from hazardous substances released by the toy.

## What is a Nordic Swan Ecolabelled toy?

A Nordic Swan Ecolabelled toy meets the Nordic Swan Ecolabel's stringent environmental and health requirements for ingoing materials, surface treatment and production of the end product. The criteria include requirements concerning certified wood raw materials, substances that are harmful to health and the environment, and working conditions at the production site.

A Nordic Swan Ecolabelled toy has documented that it meets the official requirements for toys (e.g. CE marking and safety requirements). Safety requirements are documented via test reports.

Nordic Ecolabelled toys:

- Meet strict health requirements for chemicals. It means that the toys are free from substances that can cause cancer, damage genes or reproductive capacity. They are also free from heavy metals, perfumes, nanoparticles, phthalates, and bisphenol A, F and S.
- Meet strict environmental requirements for materials used in the toy.
- Meet strict requirements on the amount and type of packaging, among other things to increase recyclability.
- Produced under proper working conditions where the toy manufacturer must comply with conventions from the International Labour Organisation (ILO) Conventions.

For toys in plastic in addition:

- Consists of plastic that can be recycled.

For toys that contain bioplastics in addition:

- Contain bioplastics that meet requirements to the vegetable raw materials.

For toys in textile in addition (only use the USPs if the mentioned textile is included in the toys):

- Are made of organic or recycled cotton.
- Are made of wool, which is organic, recycled or have low content of pesticides.
- Contain a high proportion of recycled synthetic fibres of fossil origin.
- Contain synthetic fibres of bio-based origin that meet requirements to the vegetable raw materials used.

For toys in metal in addition:

- Do not have coatings of cadmium, chromium, nickel, copper, tin, or lead.
- Contain a high proportion of recycled metal.

For toys in wood in addition:

- Contain a high proportion of wood from certified sustainable forestry.

## What can carry the Nordic Swan Ecolabel?

Toys marketed for children under the age of 14 can be Nordic Swan Ecolabelled if the toy comprises of one or more of the following materials:

- Plastic, foam, silicone, and rubber
- Textiles, hide/skins, and leather
- Filler materials
- Metal
- Paper, paperboard, and cardboard
- Solid wood and bamboo
- Wood-based panels

For toys marketed for children over the age of 3, other materials (not listed above) may individually make up no more than 1% by weight of the toy, and in total other materials must not exceed 2% by weight. Toys for children under the age of 3 must not contain any materials other than those covered by requirements in these criteria.

A toy is defined as a product that is exclusively or partially designed or intended for use by children under the age of 14 during play. The toy must be covered by the EU Toy Safety Directive (2009/48/EC). Typical toys that qualify for a Nordic Swan Ecolabel include rattles, teething toys and activity toys made of various materials for children under the age of 3. Building blocks, dolls, soft toys, puzzles, spades, cars, doll's houses, and train sets may also be Nordic Swan Ecolabelled. Ride-on cars and balance bikes for children are eligible for the Nordic Swan Ecolabel if they are covered by the EU Toy Safety Directive.

Products not covered by the EU Toy Safety Directive cannot be Nordic Swan Ecolabelled in accordance with the toy criteria. However, if they fall within other product categories for which ecolabelling criteria are already developed, the products can be Nordic Swan Ecolabelled accordingly. Such criteria might include Office and hobby supplies (writing instruments, erasers, and hobby paint) and Textiles. Notepads and drawing, colouring and children's books can be Nordic Swan Ecolabelled under the criteria for Printed matter and paper products. Activity toys (defined as toys for private use where the support structure is stationary while the activity takes place, e.g. slides, roundabouts, swings and climbing frames) can be Nordic Swan Ecolabelled under the criteria for Outdoor furniture, playground and park equipment. If there is any doubt about which criteria an activity toy belongs to, contact Nordic Ecolabelling. Nordic Ecolabelling reserves the right to determine the criteria to be used for any product application. For further information, please contact the Nordic Ecolabelling organisation in the relevant country (see addresses at the beginning of the document).

### **What cannot carry the Nordic Swan Ecolabel?**

Electronic toys, single-use toys (incl. stickers and temporary tattoos), balloons, water balloons, chemistry sets, slime toys, soap bubbles, other toys containing liquids (including encapsulated liquids) and toys with parts that could be eaten are not eligible for the Nordic Swan Ecolabel.

Hobby supplies cannot be Nordic Ecolabelled according to these criteria. Hobby materials are materials used for hobbies, crafting and pictorial art, and these products can be designated as toys under the EU Toy Safety Directive. Examples of such materials include modelling wax, fingerpaints, clay, plaster, and chemistry sets. The criteria for the Nordic Swan Ecolabelling of Office and hobby supplies explain the products that fall within their category.

Toys not covered by the EU Toy Safety Directive cannot be Nordic Swan Ecolabelled. Appendix 1 provides an overview of the product areas that are not regarded as toys, including babies' soothers, fireworks, sports equipment, and bicycles designed for sport or for use on public roads.

## **How to apply**

### **Application and costs**

For information about the application process and fees for this product group, please refer to the respective national web site. See addresses at the beginning of the document.

### **What is required?**

The application must consist of an application form/web form and documentation showing that the requirements are fulfilled.

Each requirement is marked with the letter O (obligatory requirement) and a number. All requirements must be fulfilled to be awarded a licence.

The text describes how the applicant shall demonstrate fulfilment of each requirement. There are also icons in the text to make this clearer. These icons are:

☒ Enclose

ℙ Requirement checked on site

All information submitted to Nordic Ecolabelling is treated confidentially. Suppliers can send documentation directly to Nordic Ecolabelling, and this will also be treated confidentially.

### Licence validity

The Nordic Swan Ecolabel licence is valid providing the criteria are fulfilled and until the criteria expire. The validity period of the criteria may be extended or adjusted, in which case the licence is automatically extended, and the licensee informed.

Revised criteria shall be published at least one year prior to the expiry of the present criteria. The licensee is then offered the opportunity to renew their licence.

### On-site inspection

In connection with handling of the application, Nordic Ecolabelling normally performs an on-site inspection to ensure adherence to the requirements. For such an inspection, data used for calculations, original copies of submitted certificates, test records, purchase statistics, and similar documents that support the application must be available for examination.

### Queries

Please contact Nordic Ecolabelling if you have any queries or require further information. See addresses at the beginning of the document. Further information and assistance (such as calculation sheets or electronic application help) may be available. Visit the relevant national website for further information.

## 1 Definitions

Terms	Definition
Ingoing substances and impurities	<p>The requirements in the criteria document and accompanying appendices apply to all ingoing substances in the chemical product. Impurities are not regarded as ingoing substances and are exempt from the requirements.</p> <p>Ingoing substances and impurities are defined below, unless stated otherwise in the requirements</p> <p>Ingoing substances: all substances in the chemical product, including additives (e.g. preservatives and stabilisers) in the raw materials. Substances known to be released from ingoing substances (e.g. formaldehyde, arylamine, in situ-generated preservatives) are also regarded as ingoing substances.</p> <p>Impurities: residuals, pollutants, contaminants etc. from production, incl. production of raw materials that remain in the raw material/ingredient and/or in the chemical product in concentrations less than 100 ppm (0,0100 w-%, 100 mg/kg) in the chemical product.</p> <p>Impurities in the raw materials exceeding concentrations of 1,0 % are always regarded as ingoing substances, regardless of the concentration in the chemical product.</p>

Material elements	<p>Examples of impurities are residues of the following: residues or reagents incl. residues of monomers, catalysts, by-products, scavengers, and detergents for production equipment and carry-over from other or previous production lines.</p> <p>In these criteria, material elements may be “metal elements”, “plastic elements”, “wooden elements” and so on, plus “product elements” that might comprise multiple materials as described in the relevant section.</p> <p>Material element is the designation of a unique material element in the final toys. Different material elements have various different supply chains or are produced differently but may be of the same material type. For example, textiles that are only distinguished by dyeing or printing by the same supplier are considered to be the same textile element. For example, polyester from supplier 1 is one textile element, and polyester from supplier 2 will thus be another textile element. Two different types of polyester from the same supplier will also be separate textile elements.</p> <p>See also the definition of “Material type”.</p>
Material type	<p>In these criteria, the material type may be “cotton”, “wood”, “steel”, etc. but could also be “metal”, for example.</p> <p>“Material type” differs from “material element” in that suppliers, supply chains and production processes are not relevant for “material type”. Here, only the type of material is relevant. Material types could e.g. be “plastic” or “metal” but could also be more specific materials within these categories, such as “bio-based plastic”, “steel” and so on.</p> <p>The criteria may therefore contain requirements for both material elements and material types, often with regard to when various requirements apply.</p> <p>See also the definition of “Material elements”.</p>
Recycled material	<p>Recycled material is defined in the requirement according to ISO 14021, which uses the following two categories:</p> <p><b>“Pre-consumer/commercial”</b> is defined as material that is reclaimed from the waste stream during a manufacturing process. Materials that are reworked or reground, or waste that has been produced in a process, and can be recycled within the same manufacturing process that generated it, are not considered to be pre-consumer recovered material.</p> <p>Nordic Ecolabelling considers reworked, reground or scrap material that cannot be recycled directly in the same process, but requires reprocessing (e.g. in the form of sorting, remelting and granulating) before it can be recycled, to be pre-consumer/commercial material. This is irrespective of whether the processing is done in-house or externally.</p> <p><b>“Post-consumer/commercial”</b> recycled material is defined by ISO 14021 as follows: “Post-consumer/commercial” is defined as material generated by households or commercial, industrial or institutional facilities in their role as end-users of a product that can no longer be used for its intended purpose. This includes materials from the distribution chain.</p>
Material element/type with which the child is in contact	<p>“Material element/type with which the child is in contact” means an element that the child might come into contact with during normal or expected use of the toy.</p> <p>Example of elements with which a child cannot come into contact: encapsulated elements or elements that are covered, so that it is impossible for the child to come into contact with them. All other elements that the child is able to touch are defined as elements with which the child is in contact.</p>
Nanomaterials	<p>The European Commission’s definition from 18 October 2011 (2011/696/EU):</p> <p>Nanomaterials: A natural, incidental or purposely manufactured material containing particles, in an unbound state or as an aggregate or as an agglomerate and where, for at least 50% of the particles in the number size distribution, one or more external dimensions are in the size range of 1–100 nm.</p>

## 2 Triviality and requirement limits

The Toy product group comprises products with many different material compositions. The criteria therefore set requirements for many different materials, but normally there will only be a selection of these materials in a single product. It is therefore important to note which requirements are triggered for the individual product.

For requirement limits for materials, and for the toy, see the table below and the intro text in the relevant material section and/or requirement.



A material type that is not subject to requirements in these criteria may account for no more than 1% by weight of the toy. In total, the toy may contain a maximum of 2% by weight of material types for which there are no requirements. Toys for children under the age of 3 must not contain any material type other than those covered by requirements in these criteria.

**Table: Overview of triggers for requirements in the criteria**

Material or requirement type	Focus area	Req. no.	Requirement triggered by: - wt% of material type* - wt% of material element* - Children in contact with element/type* *See definition in section 1
Description of toy	Description of toy	O1	Applies to all toys
EU Toy Safety Directive	EU Toy Safety Directive	O2	
Fragrances/aroma compounds	Fragrances/aroma compounds	O3	
Antibacterial substances	Antibacterial substances	O4	
Nanomaterials	Nanomaterials	O5	
Adhesives used in toy	Adhesives used in toy	O6–O9	
Plastic, foam, silicone and rubber	Information on polymer type and surface treatment	O10	Irrespective of amount
	Ban on polymer types and plastic composites	O11	
	Third-party control of test from EN 71	O12	
	Surface treatment	O13–O15	
	Recycled plastic – Use and source	O16	Child in contact with it, or over 5 wt% of material elements
	Substances added to polymer	O17–O18	
	Pigments	O19	
	Impurities in the polymer	O20	
	Silicones – D4, D5 and D6	O21	
	PAHs	O22	
	Foam – Emissions	O23	
	Foam – Emission of formamide	O24	
	Foam EVA, PUR and polystyrene – Blowing agents and isocyanate compounds	O25	
	Elastomers – Nitrosamines and nitrosatable substances	O26	
Elastomers – 1,3-butadiene	O27		
Bio-based polymers – Raw material	O28	Over 10 wt% of material type	
Textiles, hide/skins and leather	Third-party control of test from EN 71	O29	Irrespective of amount
	Ecolabelled textiles, hide/skins and leather	O30	
	Oeko-Tex certified textiles, hide/skins and leather	O31	
	Hides/skins and leather – Origin	O32	
	Textile – Formaldehyde	O33	
	Hides/skins and leather – Formaldehyde	O34	
	Hides/skins and leather – Chromium, cadmium and lead	O35	
	Recycled textiles, hide/skins and leather – Sources	O36	

	Halogenated flame retardants	O37	Over 5 wt% of material elements
	Chemical products – Chemical overview	O38	
	Chemical products – Classification	O39	
	Bleaching agents	O40	Over 30 wt% of material elements
	Cotton fibre	O41	Over 30 wt% of material type
	Synthetic fibre – Fossil origin	O42	
	Synthetic fibre – Bio-based origin	O43	
	Wool and other keratin fibres	O44–O45	
	Recycled fibres	O46	
Filler materials	All types	Section 7	Irrespective of amount, but see also description in section 7
	Feathers and down	O47–O48	
	Other renewable raw materials – Microbial cleanliness	O49	
	Chemical additives and treatments	O50	
Metal	Copper, tin, lead, and cadmium – Ban	O51	Irrespective of amount
	Third-party control of test from EN 71	O52	
	Surface treatment	O53–O55	
	Metal coating	O56	
	Metal coating – Facility	O57	Over 5 wt% of material type
	Proportion of recycled metal	O58	Over 30 wt% of material type
Paper, paperboard and cardboard	Third-party control of test from EN 71	O59	Irrespective of amount
	Printing and surface treatment	O60–O62	
	Fibre raw materials	O63–O64	Over 10 wt% of material type
Solid wood and bamboo	Third-party control of test from EN 71	O65	Irrespective of amount
	Tree species	O66	
	Recycled parts	O67	
	Surface treatment	O68–O70	
	Traceability and certification	O71	Over 10 wt% of material type
Wood-based panels	Third-party control of test from EN 71	O72	Irrespective of amount
	Surface treatment	O73	
	Tree species	O74	
	Chemical products – Panel production	O75–O77	Over 5 wt% of material elements
	Formaldehyde	O78	
	Traceability and certification	O79	Over 10 wt% of material type
Spare parts	Spare parts	O80	Applies to: - Toys designed to carry a child's weight and that have moving parts - Toys sold to institutions, comprising individual parts that are necessary for the function or the original play concept
Packaging	Volume	O81	Applies to all toys
	Plastic types – Ban	O82	
	Recyclability and recycled materials	O83	
	Design for recycling	O84	

	Information on sorting for recycling	O85	
Transport and storage	Transport and storage	O86	Applies to all toys
Social and ethical requirements	Social and ethical requirements	O87	Applies to all toys
Procedure and controls	Procedure and controls	O88–O95	Applies to all toys

### 3 Description of the toy product

The toy products, material composition, manufacturing process, suppliers, etc. must be described to aid the assessment of which requirements need to be met.

#### O1 Description of toy

The applicant must submit the following information about each toy:

- **State product type**, trade name(s) and age group at which the toy is aimed.  
 Only toys covered by the product group definition described in section 1 may obtain a licence.  
 Toys whose main function can only be used once are not eligible for the Nordic Swan Ecolabel.
- **Where the products are to be sold** (to institutions or private consumers, physical stores, online stores, etc.).
- **Illustrations** or photos of the product.
- **Overview of materials and composition:** Overview of all ingoing material types (e.g. wood, plastic, rubber, textile, foam, adhesive, etc.), including the following information for each material element:
  - a) Trade name/item number and material type.
  - b) Supplier of the material.
  - c) Weight in g of the material in the finished toy.
  - d) % by weight of the material in the finished toy.
  - e) Whether the material has a surface treatment.
  - f) How the material is used in the toy (function, location and whether a child might come into contact with the material during normal or expected use of the toy).
- **Description of the manufacturing process** for the toy. Suppliers must be described with the company name, production site, contact person and the production processes performed, e.g. textile dyeing or metal coating. Form in Appendix 3 may be used. The production and supply chain can be described using a flow chart, for example as shown in Appendix 4.

A material type that is not subject to requirements in these criteria may account for no more than 1% by weight of the toy. In total, the toy may contain a maximum of 2% by weight of material types for which there are no requirements. Toys for children under the age of 3 must not contain any material type other than those covered by requirements in these criteria.

See the definition of material type and material element in section 1.

- Description and photos/drawings of the products covered by the application, as set out above.

- Overview of the materials, which must include the information required above. Form in Appendix 3 may be used.
- Declaration from the applicant that the toy meets the product group definition in section 1.
- Description of the toy's function, demonstrating that it is not a single-use product.
- Submit a description of the production chain and the production processes (preferably in a flow chart), and state which suppliers perform each process. See the example in Appendix 4.
- Submit an overview of production processes with information on the type of process, the company name, production location and contact person for each process performed. See the example in Appendix 4.

## 4 General requirements – applicable to all toys

Requirements in this section must be met by all types of toys, irrespective of their materials or amounts thereof.

### 4.1 EU Toy Safety Directive

#### O2 EU Toy Safety Directive

The toy must meet the CE marking requirements set out in the EU Toy Safety Directive (2009/48/EC). This can be documented, among others, by submitting an EC declaration of conformity for each toy. Note that if the toy is for children under the age of 3 or is intended to be placed in the mouth, it must also comply with Appendix C of the EU Toy Directive (2009/48/EC), which is amended on an ongoing basis<sup>1</sup>.

The toy must also meet the safety requirements in EN 71-1 Mechanical and physical properties and EN 71-2 Flammability, as well as other relevant safety requirements in the EN 71 series (see relevant material requirements in these criteria).

In addition, the toy must meet any other national and European statutory requirements, such as REACH and the associated restrictions on specific chemicals.

- EC declaration of conformity see description in Annex III to the EU Toy Safety Directive (2009/48/EC), for each toy product.
- Test report in accordance with EN 71-1 and EN 71-2, showing fulfilment of the requirement. Plus, declaration from the test laboratory confirming conformity with the requirements in EN 71-1 and EN 71-2 for the types of toys for which the application is being made. The analysis laboratory must meet the requirements in Appendix 2.
- Declaration from the applicant that the toy complies with all European and any national statutory requirements in the countries in which the toy will be sold.

### 4.2 Perfume, antibacterial substances, and nanomaterials

#### O3 Perfume/fragrances

Perfume/fragrances must not be added to the toy or to the ingoing materials in the toy.

- Declaration from the toy manufacturer that the requirement is fulfilled.

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<sup>1</sup> [http://ec.europa.eu/growth/sectors/toys/safety/legislation\\_en](http://ec.europa.eu/growth/sectors/toys/safety/legislation_en)

- Declaration from the suppliers of the different materials that the requirement is fulfilled.

#### O4 Antibacterial substances

Chemical products and nanomaterials\* with antibacterial or disinfectant properties must not be added to the finished toy.

Antibacterial refers to chemical products that inhibit or stop the growth of microorganisms such as bacteria or fungi. Silver ions, nano silver, nano gold, and nano copper are considered antibacterial substances.

Furthermore, no claims may be made about any antibacterial effect in conjunction with the marketing of the toy, even if the effect is naturally inherent in the material (e.g. bamboo).

*\* The definition of nanomaterial follows the European Commission's definition of nanomaterial of 18 October 2011 (2011/696/EU), see definition in section 1.*

- Declaration from the toy manufacturer that the requirement is fulfilled.

#### O5 Nanomateriale

The chemical product must not have nanomaterials\* as ingoing substances<sup>1</sup>. Exemptions are made for:

- Pigments. This exemption does not include pigments added for other purposes than imparting colour.
- Naturally occurring inorganic fillers\*\*
- Synthetic amorphous silica\*\*\*

*\* In accordance with the definition of a nanomaterial adopted by the European Commission on 18 October 2011 (2011/696/EU), see definition in 1.*

*\*\* This applies to fillers covered by Annex V item 7 of REACH.*

*\*\*\* This applies to traditional synthetic amorphous silica.*

*<sup>1</sup> See the definition of ingoing substances in section 1.*

- Declaration from the toy manufacturer that the requirement is fulfilled.
- Declaration from suppliers of the different materials that the requirement is fulfilled (see relevant appendix under each material section).

### 4.3 Adhesives used in toy

The requirements in this section refer to adhesives used to glue the elements of the toy together.

Adhesives used in the production of materials in the toy, such as wood-based panels, must instead meet the chemical requirements for the relevant material, as set out in these criteria.

#### O6 Classification of adhesives

Adhesives used to glue the elements of the toy together must not have any classification listed in the table below.

Adhesives used in the production of materials in the toy, such as wood-based panels, must instead meet the chemical requirements for the relevant material, as set out in these criteria.

**Table: List of non-permitted classifications of adhesives**

CLP Regulation 1272/2008		
Hazard statement	Hazard class and category	Hazard code
Carcinogenic	Carc. 1A or 1B Carc. 2	H350 H351
Mutagenic	Muta. 1A or 1B Muta. 2	H340 H341
Reprotoxic	Repr. 1A or 1B Repr. 2 Lact.	H360 H361 H362
Hazardous to the aquatic environment	Aquatic acute 1 Aquatic chronic 1 Aquatic chronic 2	H400 H410 H411
Hazardous to the ozone layer	Ozone	H420
Acute toxicity	Acute Tox. 1 or 2 Acute Tox. 1 or 2 Acute Tox. 1 or 2 Acute Tox. 3 Acute Tox. 3 Acute Tox. 3 Acute Tox. 4 Acute Tox. 4 Acute Tox. 4	H300 H310 H330 H301 H311 H331 H302 H312 H332
Specific target organ toxicity	STOT SE 1 STOT RE 1 STOT RE 2 STOT SE 2	H370 H372 H371 H373
Sensitising (allergenic)	Resp. sens. 1, 1A or 1B Skin sens. 1, 1A or 1B	H334 H317

*The classifications in the table concern all classification variants. For example, H350 also comprises the H350i classification.*

- Safety data sheet compliance with current European legislation.
- Declaration from the adhesive manufacturer/supplier showing that the requirement is fulfilled.

## 07 CMR substances in adhesives

The requirement covers ingoing substances<sup>1</sup> in adhesives.

Ingoing substances in additives must not have any classification listed in the table below.

### Exemptions from the requirement:

Formaldehyde as an impurity in newly produced polymers is exempted, see instead the separate formaldehyde requirement O9.

<sup>1</sup> See the definition of ingoing substances in section 1.

**Table: List of non-permitted classifications of ingoing substances in additives**

CLP Regulation 1272/2008		
Hazard statement	Hazard class and category	Hazard code
Carcinogenic	Carc. 1A or 1B Carc. 2	H350 H351
Mutagenic	Muta. 1A or 1B Muta. 2	H340 H341

Reprotoxic	Repr. 1A or 1B Repr. 2 Lact.	H360 H361 H362
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*The classifications in the table concern all classification variants. For example, H350 also comprises the H350i classification.*

- Declaration from the adhesive manufacturer/supplier showing that the requirement is fulfilled.

## O8 Prohibited substances in adhesives

The requirement covers adhesives used in toys.

**The following substances must not be present<sup>1</sup> in additives in the adhesive:**

- Substances on the EU's Candidate List in accordance with REACH, 1907/2006/EC, article 59, section 10 on the European Chemicals Agency (ECHA) website.
- Substances that are assessed by the EU to be PBT substances (persistent, bioaccumulative and toxic substances) or vPvB substances (very persistent and very bioaccumulative) in accordance with the criteria in Annex XIII of REACH.
- Substances that are considered to be potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects. The list can be found here:  
[http://ec.europa.eu/environment/chemicals/endocrine/pdf/final\\_report\\_2007.pdf](http://ec.europa.eu/environment/chemicals/endocrine/pdf/final_report_2007.pdf)

In addition, the following substances and substance groups must not be present<sup>1</sup>. There may be overlaps between the substances on the following item list and the substances or groups of substances of which the properties are listed above:

- Halogenated organic compounds<sup>2</sup> (e.g. organic chloroparaffins, fluorine compounds, halogenated flame retardants, chlorophenols, etc.). The following are exempted:
  - Bronopol up to 0.05 wt%
  - The blend (3:1) of CMIT/MIT (5-chloro-2-methyl-4-isothiazolin-3-one; 2-methyl-4-isothiazolin-3-one) up to 0.0015 wt%
  - IPBC (iodopropynyl butylcarbamate) up to 0.20 wt%
- Isothiazolinones (total) at more than 0.0200 wt%
- Bisphenol A, S and F
- Alkylphenols, alkylphenol ethoxylates or other alkylphenol derivatives<sup>3</sup>
- Butyl hydroxytoluene (BHT) and butyl hydroxyanisole (BHA)
- Phthalates<sup>4</sup>
- Pigments and additives based on lead, tin, cadmium, chromium (VI), mercury, antimony, arsenic and their compounds
- Volatile aromatic hydrocarbons (VAH)<sup>5</sup>
- Volatile aromatic compounds (VOC) at more than 3 wt%<sup>6</sup>

<sup>1</sup> See the definition of ingoing substances in section 1.

<sup>2</sup> Be aware of national legislation concerning PFOA if the product is to be sold/marketed in Norway.

*In Norway, PFOA is governed by the “Regulation on restrictions to the use of health- and environmentally hazardous chemicals and other products (Product Regulations)”, Section 2-32.*

<sup>3</sup> *Alkylphenol derivatives are defined as substances released from alkylphenols on degradation.*

<sup>4</sup> *Phthalates are esters of 1,2-benzenedicarboxylic acid (orthophthalic acid).*

<sup>5</sup> *Volatile aromatic hydrocarbons (VAH) are defined as aromatic compounds whose boiling point is max 250°C, measured at a standard pressure of 101.3 kPa.*

<sup>6</sup> *Volatile organic compounds (VOC) are defined as organic substances with an initial boiling point of max 250°C measured at a standard pressure of 101.3 kPa.*

- Declaration from the adhesive manufacturer/supplier showing that the requirement is fulfilled.

## 09 Formaldehyde in adhesives

Formaldehyde shall not be included<sup>1</sup> in the adhesive used, with the exception of formaldehyde generated during the production process.

Formaldehyde generated during the polymer production may amount to no more than 250 ppm (0.025 wt%) measured in newly produced polymer dispersion. This is on condition that the content of formaldehyde in the finished adhesive is no more than 10 ppm (0.0010 wt%).

*Measured using the Merckoquant method (see Appendix X of RAL-UZ 102), the VdL-RL 03 method “In-can concentration of formaldehyde determined by the acetyl-acetone method”, EPA 8315A or another equivalent test method approved by Nordic Ecolabelling.*

<sup>1</sup> *See the definition of ingoing substances in section 1.*

- Declaration from the adhesive supplier that no formaldehyde has been added and that the polymer used in the adhesive meets the requirement.
- Test showing the formaldehyde content of the finished adhesive. The analysis laboratory must meet the requirements in Appendix 2.

## 5 Plastic, foam, silicone, and rubber

The requirements in this section concern material elements/types made of plastic, foam (not used as a filler material), silicone and rubber (natural and synthetic latex). Fossil, bio-based and recycled materials are covered.

Polymer materials used as textiles and filler materials are not subject to the requirements in this section, but must instead meet those in sections 6 and 7.

### 5.1 Requirements that apply irrespective of amount in product

The requirements in this section concern all material elements made of plastic, foam, silicone, and rubber (natural and synthetic latex). See the definition of material element in section 1.

#### 010 Information on polymer type and surface treatment

The following applies to all polymer materials (plastic, foam, silicone and rubber) in the toy:

- State polymer type.
- State whether the polymer is fossil or biobased.



- State whether the plastic raw material is recycled\*.
- State whether the plastic/foam/rubber/silicone element has a surface treatment.
- State where in the toy any recycled material features and whether the recycled material is pre- or post-consumer or a mix of the two, in accordance with ISO 14021\*.

\* **Recycled material:** Pre-consumer or post-consumer recycled raw materials, see the definition in the ISO 14021 standard. See the definitions in section 1 for more details.

- An overview of the polymer materials used, including the information set out in the requirement.

#### O11 Polymer types and plastic composites – Ban

**The following polymer/plastic types and blends must not be present in the toy:**

- Chlorinated plastic, e.g. polyvinyl chloride (PVC) and polyvinyl dichloride (PVDC)
- Polycarbonate
- Biodegradable plastic
- Oxo-degradable plastic
- Plastic composites (i.e. plastic blended with other materials such as wood fibre or bamboo)

- Declaration from the applicant that the requirement is fulfilled.
- Documentation showing the material composition of the product, see requirement O1.

#### O12 Third-party control of test from EN 71 in EU Toy Safety Directive

The following tests for the polymer materials used must be submitted for toys or elements of toys:

- **EN 71-3:** Toys – Safety requirements – Part 3: Migration of certain elements  
and
- **EN 71-9:** Toys – Safety requirements – Part 9: Organic chemical substances – Requirement

The requirement applies only to types of toys covered by the standards above.

- Test report in accordance with EN 71-3 and EN 71-9 for plastic, foam, silicone, or rubber elements, showing fulfilment of the requirement. And declaration from the test laboratory confirming conformity with the requirements in EN 71-3 and EN 71-9 for the types of toys for which the application is being made. The analysis laboratory must meet the requirements in Appendix 2.

#### O13 Surface treatment – Chemical products, Classification

Chemical products used for surface treatment of plastic/foam/silicone/rubber elements of the product must not have any of the classifications listed in the table below.

In addition, surface treatments of plastic elements must not negatively affect the recyclability of the polymer material.

**Table: List of non-permitted classifications of chemical products**

CLP Regulation 1272/2008		
Hazard statement	Hazard class and category	Hazard code
Carcinogenic	Carc. 1A or 1B Carc. 2	H350 H351
Mutagenic	Muta. 1A or 1B Muta. 2	H340 H341
Reprotoxic	Repr. 1A or 1B Repr. 2 Lact.	H360 H361 H362
Hazardous to the aquatic environment	Aquatic acute 1 Aquatic chronic 1 Aquatic chronic 2	H400 H410 H411
Hazardous to the ozone layer	Ozone	H420
Acute toxicity	Acute Tox. 1 or 2 Acute Tox. 1 or 2 Acute Tox. 1 or 2 Acute Tox. 3 Acute Tox. 3 Acute Tox. 3 Acute Tox. 4 Acute Tox. 4 Acute Tox. 4	H300 H310 H330 H301 H311 H331 H302 H312 H332
Specific target organ toxicity	STOT SE 1 STOT RE 1 STOT RE 2 STOT SE 2	H370 H372 H371 H373
Sensitising (allergenic)	Resp. sens. 1, 1A or 1B Skin sens. 1, 1A or 1B	H334 H317

*The classifications in the table concern all classification variants. For example, H350 also comprises the H350i classification.*

- Safety data sheet for the chemical product in accordance with current European legislation.
- Declaration from the manufacturer of the chemical product used for surface treatment, confirming fulfilment of the requirement.
- Declaration from the applicant or the manufacturer of the plastic element, confirming that the surface treatment does not negatively affect recyclability.

#### O14 Surface treatment – CMR substances

The requirement covers ingoing substances<sup>1</sup> in chemical products for surface treatment. Ingoing substances<sup>1</sup> must not have any classification listed in the table below.

**Table: List of non-permitted classifications of ingoing substances**

CLP Regulation 1272/2008		
Hazard statement	Hazard class and category	Hazard code
Carcinogenic	Carc. 1A or 1B Carc. 2	H350 H351
Mutagenic	Muta. 1A or 1B Muta. 2	H340 H341
Reprotoxic	Repr. 1A or 1B Repr. 2 Lact.	H360 H361 H362

*The classifications in the table concern all classification variants. For example, H350 also comprises the H350i classification.*

<sup>1</sup> See the definition of ingoing substances in section 1.

- ☒ Declaration from the manufacturer/supplier of the chemical product used for surface treatment, confirming fulfilment of the requirement.

## O15 Surface treatment – Prohibited substances

The requirement covers ingoing substances<sup>1</sup> in chemical products for surface treatment.

### **The following substances must not be present<sup>1</sup>:**

- Substances on the EU's Candidate List in accordance with REACH, 1907/2006/EC, article 59, section 10 on the European Chemicals Agency (ECHA) website.
- Substances that are assessed by the EU to be PBT substances (persistent, bioaccumulative and toxic substances) or vPvB substances (very persistent and very bioaccumulative) in accordance with the criteria in Annex XIII of REACH.
- Substances that are considered to be potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects. The list can be found here:  
[http://ec.europa.eu/environment/chemicals/endocrine/pdf/final\\_report\\_2007.pdf](http://ec.europa.eu/environment/chemicals/endocrine/pdf/final_report_2007.pdf)

In addition, the following substances and substance groups must not be present<sup>1</sup>. There may be overlaps between the substances on the following item list and the substances or groups of substances of which the properties are listed above:

- Halogenated organic compounds<sup>2</sup> (e.g. organic chloroparaffins, fluorine compounds, halogenated flame retardants, chlorophenols, etc.). The following are exempted:
  - Bronopol up to 0.05 wt%
  - The blend (3:1) of CMIT/MIT (5-chloro-2-methyl-4-isothiazolin-3-one; 2-methyl-4-isothiazolin-3-one) up to 0.0015 wt%
  - IPBC (iodopropynyl butylcarbamate) up to 0.20 wt%
  - Pigment which complies with EU requirements for dyes in plastic materials in contact with food under Resolution AP (89) point 2.5.
- Isothiazolinones (total) at more than 0.05 wt%
- Bisphenol A, S and F
- Alkylphenols, alkylphenol ethoxylates or other alkylphenol derivatives<sup>3</sup>
- Butyl hydroxytoluene (BHT) and butyl hydroxyanisole (BHA)
- Phthalates<sup>4</sup>
- Pigments and additives based on lead, tin, cadmium, chromium (VI), mercury, antimony, arsenic and their compounds
- Volatile aromatic hydrocarbons (VAH)<sup>5</sup>
- Volatile aromatic compounds (VOC)<sup>6</sup> at more than 80 g/l

<sup>1</sup> See the definition of ingoing substances in section 1.

<sup>2</sup> Be aware of national legislation concerning PFOA if the product is to be sold/marketed in Norway. In Norway, PFOA is governed by the "Regulation on restrictions to the use of health- and environmentally hazardous chemicals and other products (Product Regulations)", Section 2-32.

<sup>3</sup> *Alkylphenol derivatives are defined as substances released from alkylphenols on degradation.*

<sup>4</sup> *Phthalates are esters of 1,2-benzenedicarboxylic acid (orthophthalic acid).*

<sup>5</sup> *Volatile aromatic hydrocarbons (VAH) are defined as aromatic compounds whose boiling point is max 250°C, measured at a standard pressure of 101.3 kPa.*

<sup>6</sup> *Volatile organic compounds (VOC) are defined as organic substances with an initial boiling point of max 250°C measured at a standard pressure of 101.3 kPa.*

- Declaration from the manufacturer/supplier of the chemical product used for surface treatment, confirming fulfilment of the requirement.

## 5.2 Requirements that apply to plastic elements/types that children come into contact with or that constitute over 5% by weight of the toy

The requirements in this section cover all plastic elements with which the child may come into contact during normal or expected use of the toy, or where the type of plastic makes up more than 5% by weight of the toy. For a definition of the terms material element and type, see section 1.

### O16 Recycled plastic – Use and source

**The following applies regarding toys for children under the age of 3, toys that are intended to be placed in the mouth or toys that imitate food and services:**

Recycled plastic\* must not be used unless it originates from the production of Nordic Swan Ecolabelled toys.

**For other toys:**

Recycled plastic\* must only originate from one of the sources below (or a combination of these):

- Plastic approved for contact with food.
- Recycled plastic from production lines where the whole production chain is known (e.g. residual plastics from in-house production or other known production) and where it can be guaranteed that the plastic does not contain prohibited substances as set out in requirements O17–O22. Such plastic must also conform with the EU Toy Safety Directive and the safety requirements in EN 71.
- Recycled plastic from the production of Nordic Swan Ecolabelled toys.

\* **Recycled fibres or materials:** *Pre-consumer or post-consumer recycled raw materials, see the definition in the ISO 14021 standard.*

*Both mechanically and chemically recycled fibres are included. See the definitions in section 1 for more details.*

- Detailed description of the sources of the recycled plastic and the means of ensuring that the plastic conforms to requirements O17–O22, the EU Toy Safety Directive and the safety requirements in EN 71. In addition, the applicant must submit written procedure which are implemented in the company to ensure ongoing compliance with the requirement during production.

### O17 CMR substances added to the polymer

The requirement concerns ingoing substances<sup>1</sup> in additives that are actively added to the polymer raw material in the master batch or compound in the production of plastic, foam, silicone, or rubber.

The requirement also covers substances that are added during re-compounding of recycled plastic raw materials.

Ingoing substances<sup>1</sup> in additives must not have any classification listed in the table below.

**Table: List of non-permitted classifications of ingoing substances in additives**

CLP Regulation 1272/2008		
Hazard statement	Hazard class and category	Hazard code
Carcinogenic	Carc. 1A or 1B	H350
	Carc. 2	H351
Mutagenic	Muta. 1A or 1B	H340
	Muta. 2	H341
Reprotoxic	Repr. 1A or 1B	H360
	Repr. 2	H361
	Lact.	H362

*The classifications in the table concern all classification variants. For example, H350 also comprises the H350i classification.*

<sup>1</sup> See the definition of ingoing substances in section 1.

- Declaration from the manufacturer/supplier for all plastic, foam, silicone, or rubber elements, confirming fulfilment of the requirement.

## O18 Prohibited substances added to the polymer

The requirement concerns additives that are actively added to the polymer raw material in the master batch or compound in the production of plastic, foam, silicone, or rubber. The requirement also covers substances that are added during re-compounding of recycled plastic raw materials.

**The following substances must not be present<sup>1</sup> in additives in the adhesive:**

- Substances on the EU's Candidate List in accordance with REACH, 1907/2006/EC, article 59, section 10 on the European Chemicals Agency (ECHA) website.
- Substances that are assessed by the EU to be PBT substances (persistent, bioaccumulative and toxic substances) or vPvB substances (very persistent and very bioaccumulative) in accordance with the criteria in Annex XIII of REACH.
- Substances that are considered to be potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects. The list can be found here:  
[http://ec.europa.eu/environment/chemicals/endocrine/pdf/final\\_report\\_2007.pdf](http://ec.europa.eu/environment/chemicals/endocrine/pdf/final_report_2007.pdf)

In addition, the following substances and substance groups must not be present<sup>1</sup>. There may be overlaps between the substances on the following item list and the substances or groups of substances of which the properties are listed above:

- Halogenated organic compounds<sup>2</sup> (e.g. organic chloroparaffins, fluorine compounds, halogenated flame retardants, chlorophenols, etc.). The following are exempted:
  - Bronopol up to 0.05 wt%
  - The blend (3:1) of CMIT/MIT (5-chloro-2-methyl-4-isothiazolin-3-one; 2-methyl-4-isothiazolin-3-one) up to 0.0015 wt%
  - IPBC (iodopropynyl butylcarbamate) up to 0.20 wt%

- Pigment which complies with EU requirements for dyes in plastic materials in contact with food under Resolution AP (89) point 2.5.
- Isothiazolinones (total) at more than 0.05 wt%
- Bisphenol A, S and F
- Alkylphenols, alkylphenol ethoxylates or other alkylphenol derivatives<sup>3</sup>
- Butyl hydroxytoluene (BHT) and butyl hydroxyanisole (BHA)
- Phthalates<sup>4</sup>
- Pigments and additives based on lead, tin, cadmium, chromium (VI), mercury, antimony, arsenic and their compounds

<sup>1</sup> See the definition of ingoing substances in section 1.

<sup>2</sup> Be aware of national legislation concerning PFOA if the product is to be sold/ marketed in Norway. In Norway, PFOA is governed by the “Regulation on restrictions to the use of health- and environmentally hazardous chemicals and other products (Product Regulations)”, Section 2-32.

<sup>3</sup> Alkylphenol derivatives are defined as substances released from alkylphenols on degradation.

<sup>4</sup> Phthalates are esters of 1,2-benzenedicarboxylic acid (orthophthalic acid).

- Declaration from the manufacturer/supplier for all plastic, foam, silicone, or rubber elements, confirming fulfilment of the requirement.
- Declaration from the manufacturer/supplier of the chemical product used for surface treatment, confirming fulfilment of the requirement.

## O19 Pigments in plastic, foam, silicone, and rubber

Pigments used for the colouring of plastic, foam, silicone, and rubber must be approved in line with one of the guidelines below:

- The EU’s guidelines for materials that are intended to come into contact with food (Regulation (EC) No 1935/2004)
- The guidelines of the US Food and Drug Administration (FDA)
- The guidelines of the German Federal Institute for Risk Assessment (BfR)

- Declaration from the manufacturers/suppliers of the different polymer materials, stating that the pigments used comply with the requirement.
- Documentation that the pigments have one of the approvals according to the requirement.

## O20 Residual monomers in the polymer

The requirement covers residual monomers that derive from the actual polymer production.

Recycled plastic is exempted from this requirement.

The level of residual monomers with a classification listed in the table below must not exceed 100 ppm/dry substance per classification, measured in the newly produced polymer dispersion.

CLP Regulation 1272/2008		
Hazard statement	Hazard class and category	Hazard code
Carcinogenic	Carc. 1A or 1B Carc. 2	H350 H351
Mutagenic	Muta. 1A or 1B Muta. 2	H340 H341

Reprotoxic	Repr. 1A or 1B Repr. 2 Lact.	H360 H361 H362
Acute toxicity	Acute Tox. 1 or 2 Acute Tox. 1 or 2 Acute Tox. 1 or 2 Acute Tox. 3 Acute Tox. 3 Acute Tox. 3 Acute Tox. 4 Acute Tox. 4 Acute Tox. 4	H300 H310 H330 H301 H311 H331 H302 H312 H332
Specific target organ toxicity	STOT SE 1 STOT RE 1 STOT RE 2 STOT SE 2	H370 H372 H371 H373
Sensitising (allergenic)	Resp. sens. 1, 1A or 1B Skin sens. 1, 1A or 1B	H334 H317

*The classifications in the table concern all classification variants. For example, H350 also comprises the H350i classification.*

- Declaration from the polymer manufacturer that the requirement is fulfilled.

#### O21 D4, D5 and D6 in silicone

The cyclic siloxanes D4 (CAS no. 556-67-2), D5 (CAS no. 541-02-6) and D6 (CAS no. 540-97-6) may only be present in the form of residues from the raw material production, and each one may only be present in amounts up to 1000 ppm in the silicone raw material.

- Test from the silicone manufacturer documenting compliance with the requirement. The analysis laboratory must meet the requirements in Appendix 2.

#### O22 Polycyclic aromatic hydrocarbons (PAH) in plastic, foam, silicone, and rubber

For plastic, foam, rubber and silicone, the PAH levels in the table below must be complied with. The contamination limit of 100 ppm in the definition of ingoing substances<sup>1</sup> thus does not apply in this requirement.

<sup>1</sup> See the definition of ingoing substances in section 1.

**Table: Requirements concerning selected PAH content in the material**

Substance name	CAS no.	Requirement limit
Benzo[a]pyrene	50-32-8	< 0.5 mg/kg
Benzo[e]pyrene	192-97-2	< 0.5 mg/kg
Benzo[a]anthracene	56-55-3	< 0.5 mg/kg
Dibenzo[a,h]anthracene	53-70-3	< 0.5 mg/kg
Benzo[b]fluoranthene	53-70-3	< 0.5 mg/kg
Benzo[j]fluoranthene	205-82-3	< 0.5 mg/kg
Benzo[k]fluoranthene	207-08-9	< 0.5 mg/kg
Chrysene	218-01-9	< 0.5 mg/kg
Acenaphthylene	208-96-8	Counted in total for all 24
Acenaphthene	83-32-9	Counted in total for all 24
Benzo[ghi]perylene	191-24-2	Counted in total for all 24
Fluorene	86-73-7	Counted in total for all 24
Indeno[1,2,3-cd]pyrene	193-39-5	Counted in total for all 24
Phenanthrene	85-01-8	Counted in total for all 24
Pyrene	129-00-0	Counted in total for all 24



Anthracene	120-12-7	Counted in total for all 24
Fluoranthene	206-44-0	Counted in total for all 24
Cyclopenta[c,d]pyrene	27108-37-3	Counted in total for all 24
Dibenzo[a,e]pyrene	192-65-4	Counted in total for all 24
Dibenzo[a,h]pyrene	189-64-0	Counted in total for all 24
1-Methylpyrene	2381-21-7	Counted in total for all 24
Naphthalene	91-20-3	Counted in total for all 24
<b>Sum of all 24 PAHs in the table</b>		<b>&lt; 5 mg/kg</b>

Test method: Determination of polycyclic aromatic hydrocarbons (PAH) using gas chromatography with mass selective detection (MSD).

Alternatively, a certificate for Oeko-Tex 100 Class I Baby can be used.

- Test report for plastic, silicone, or rubber element, showing compliance with the requirement. The analysis laboratory must meet the requirements in Appendix 2.
- Oeko-Tex 100 Class I Baby certificate for plastic, silicone, or rubber element.

### O23 Foam (e.g. EVA, polyurethane (PUR) and expanded polystyrene) – Emissions

Emissions of the following substances and substance groups must not exceed the limits stated in the table below.

Emissions testing must be performed in line with parts 3, 6, 9 and 11 of the ISO 16000 standard.

**Table: Requirement levels for emissions of volatile organic compounds**

Substance or substance group	Requirement limit
Formaldehyde (50-00-0)	0.1 mg/m <sup>3</sup>
Toluene (108-88-3)	0.1 mg/m <sup>3</sup>
Styrene (100-42-5)	0.005 mg/m <sup>3</sup>
Vinylcyclohexene (100-40-3)	0.002 mg/m <sup>3</sup>
4-Phenylcyclohexene (4994-16-5)	0.03 mg/m <sup>3</sup>
Vinyl chloride (75-01-4)	0.002 mg/m <sup>3</sup>
Aromatic hydrocarbons	0.3 mg/m <sup>3</sup>
Volatile organic compounds	0.5 mg/m <sup>3</sup>

- Test reports showing that the requirement is fulfilled. The analysis laboratory must meet the requirements in Appendix 2.
- Alternatively, a licence for the EU Ecolabel for mattresses, or a certificate for either Oeko-Tex Class I Baby or CertiPUR can be used as documentation for the requirement.

### O24 Foam (e.g. EVA, polyurethane (PUR) and expanded polystyrene) – Emissions of formamide

Emissions of formamide must be no higher than 20 µg/m<sup>3</sup> after a maximum of 28 days from commencement of the emission testing of foam toy materials.

Test methods for emissions in line with standards ISO 16000-6 and ISO 16000-9.

- Test reports showing that the requirement is fulfilled. The analysis laboratory must meet the requirements in Appendix 2.

### O25 EVA, Polyurethane (PUR) or polystyrene foam – Blowing agents and isocyanate compounds

The following must be satisfied in the production of foam:

- CFC, HCFC, HFC, methylene chloride or other halogenated organic compounds may not be used as blowing agents.



- Isocyanate compounds may only be used in a closed process with the prescribed protective equipment in accordance with the official requirements.

☒ Declaration from the foam manufacturer/supplier showing that the requirement is fulfilled.

## O26 Elastomers (e.g. rubber, silicone, and thermoplastic elastomer (TPE)) – Nitrosamines and nitrosatable substances

The following requirement limits must be met:

- Migration of N-nitrosamines must not exceed 0.01 mg/kg elastomer.
- Migration of N-nitrosatable substances must not exceed 0.1 mg/kg elastomer.

The following tests are to be submitted:

**EN 71-12: Toys – Safety requirements – Part 12: N-nitrosamines and N-nitrosatable substances**

Note that EN 71-12 only requires tests for certain types of toys or parts of a toy. In these criteria, the requirement to test for the above in line with EN 71-12 applies to all types and parts of toys that contain elastomers. In addition, for some types of toys the requirement limit is stricter than in EN 71-12.

☒ Test report in line with EN 71-12 for toys or parts of a toy, showing fulfilment of the requirement. Plus, declaration from the test laboratory confirming conformity with the requirements in EN 71-12. The analysis laboratory must meet the requirements in Appendix 2.

## O27 Elastomers (e.g. rubber, silicone, and thermoplastic elastomer (TPE)) – 1,3-butadiene

The requirement relates to product elements made of elastomers such as rubber (latex), thermoplastic elastomer (TPE) and silicone.

The content of 1,3-butadiene must be less than 1 mg/kg polymer and must be determined using test method EN 13130-4.

☒ Test report documenting compliance with the requirement. The analysis laboratory must meet the requirements in Appendix 2.

## 5.3 Requirements that apply to plastic types constituting over 10% by weight of the toy

The requirements in this section concern all types of plastic, foam, silicone, and rubber (natural and synthetic latex), where the type of plastic constitutes over 10 wt% of the toy. For a definition of material type, see section 1.

## O28 Raw materials for bio-based polymers

Palm oil, soya oil and soya flour must not be used as raw materials for bio-based polymers.

Raw materials used for bio-based polymers must also meet one of the requirements below:

- Be secondary raw materials\*.
- Primary raw materials (e.g. maize, sugar cane and sugar beet) must not be genetically modified organisms (GMO)\*\*. Sugar cane must in addition be Bonsucro certified\*\*\*.

*\* Secondary raw materials are defined here as waste products from other production, e.g. by-products such as straw from grain production and by-products from maize. PFAD (Palm Fatty Acid Distillate) from palm oil is not considered a secondary raw material and therefore must not be used.*

*\*\* Genetically modified organisms are defined in EU Directive 2001/18/EC.*

*\*\*\* The producer of the bio-based polymer must hold Bonsucro's chain of custody (CoC) certification. The chain of custody must be ensured through mass balance. Book and claim systems are not accepted. The manufacturer of the bio-based polymer must document its purchase of certified raw materials for polymer production, for example in the form of specifications on an invoice or delivery note.*

*Nordic Ecolabelling may, if appropriate, consider other certification systems.*

- Declaration from the polymer manufacturer that palm oil (incl. PFAD (Palm Fatty Acid Distillate)), soya oil and soya flour are not used as raw materials in the bio-based polymer.
- For secondary raw materials: Documentation from the polymer manufacturer showing compliance with the requirement's definition of secondary raw materials. The chain of custody must be traceable back to the production/process that generated the residual product.
- For primary raw materials (incl. certified sugar cane): Declaration from the polymer manufacturer that the raw materials are not GMO under the terms of the requirement.
- For sugar cane: Copy of a valid CoC certificate or a certificate number. Documentation such as an invoice or delivery note from the producer of the bio-based polymer, showing the purchase of bio-based polymer from certified raw material in at least the same annual quantity as is used in the production of the bio-based polymer.

## 6 Textiles, hide/skins, and leather

The requirements in this section concern all components of textiles, hides/skins or leather, hereafter called "textile elements" or "textile types".

### 6.1 Requirements that apply irrespective of amount in product

The requirements in this section concern all parts of textiles, hides/skins, or leather, hereafter called "textile elements". For a definition of the term material element, see section 1.

#### O29 Third-party control of test from EN 71 in EU Toy Safety Directive

The following tests for the textile elements used must be submitted for toys or elements of toys:

- **EN 71-3:** Toys – Safety requirements – Part 3: Migration of certain elements  
and
- **EN 71-9:** Toys – Safety requirements – Part 9: Organic chemical substances – Requirement

The requirement applies only to types of toys covered by the standards above.

- Test report in relation to EN 71-3 and EN 71-9 for textile elements, showing fulfilment of the requirement.

- And declaration from the test laboratory confirming conformity with the requirements in EN 71-3 and EN 71-9 for the types of toys for which the application is being made. The analysis laboratory must meet the requirements in Appendix 2.

### O30 Ecolabelled textiles, hide/skins, and leather

If a textile element is certified with one of the ecolabels below, it is exempted from the stated requirements.

- Nordic Swan Ecolabelled textile elements are exempted from requirements O32, O33, O34 and the requirements in section 6.2.
- EU Ecolabelled textile elements are exempted from the requirements in section 6.2.
- GOTS certified textile elements are exempted from requirement O33 and the requirements in section 6.2.

- The documentation must include the trade name and the licence number for the Nordic Swan Ecolabel or EU Ecolabel licence and the transaction certificate for GOTS. A declaration must also be given that Ecolabelled textile elements have not been subsequently processed.

### O31 Oeko-Tex certified textiles, hide/skins, and leather

Textile elements (see definition in section 1) must have the following certification:

- Oeko-Tex Standard 100 Class I Baby.  
or
- Leather Standard by Oeko-Tex Class I Baby.

A declaration must also be given that textile elements have not been subsequently treated.

#### **The following are exempted:**

Textile elements with which the child will not come into contact during normal or expected use of the toy, and where the textile element makes up less than 5% by weight of the toy.

- Documentation showing that the textile element has a valid certificate for Oeko-Tex 100 Class I Baby.
- Declaration from the applicant that the textile element has not been treated with chemicals after certification.

### O32 Hides/skins and leather – Origin

Only the use of raw animal hides and skins originating from the production of milk, wool and/or meat/fish production is permitted.

Only raw hides and skins from the following animals are permitted: fish\*, sheep, goats, cows, horses, pigs, elk, deer, and reindeer.

\* *Fish leather from fish on the IUCN Red List of Threatened Species<sup>2</sup> is not accepted.*

- The applicant must submit a declaration from the leather producer or leather supplier, confirming that the raw hides/skins used derive from animals raised for milk, wool and/or meat/fish production.

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<sup>2</sup> The IUCN Redlist, <https://www.iucnredlist.org/>

### O33 Textile – Formaldehyde

The amount of free and partly hydrolysable formaldehyde in the final textile must not exceed 16 ppm.

The content of formaldehyde must be tested in accordance with standard EN ISO 14184-1.

**The following are exempted:**

Textile elements (*see definition in section 1*) with which the child will not come into contact during normal or expected use of the toy, and where the textile element makes up less than 5% by weight of the toy.

- Test report showing that the requirement is fulfilled. The analysis laboratory must meet the requirements in Appendix 2.
- A certificate for Oeko-Tex 100 Class I Baby or GOTS can also be used as documentation.

### O34 Hides/skins and leather – Formaldehyde

The amount of free and partly hydrolysable formaldehyde in the final hide/skin and leather must not exceed 20 ppm.

The content of formaldehyde must be tested accordance with EN ISO 17226-1 or 2.

**The following are exempted:**

Textile elements\* with which the child will not come into contact during normal or expected use of the toy, and where the textile element makes up less than 5% by weight of the toy.

\* See the definition of material element in section 1.

- Test report showing that the requirement is fulfilled. The analysis laboratory must meet the requirements in Appendix 2.
- A certificate for Leather Standard by Oeko-Tex Class I Baby can also be used as documentation.

### O35 Hides/skins and leather – Chromium, cadmium, and lead

The content of chromium (total) in the final treated leather or hide/skin (including finishing) must be less than or equal to 0.1% (mass of chromium per total dry weight of leather or hide/skin), in line with EN ISO 5398.

There must be no chromium (VI) present in the final treated leather or hide/skin (including finishing), in accordance with EN ISO 17075 (detection limit of 3 ppm) or equivalent.

Cadmium and lead must not be present in the finished hide/skin or leather. The content of cadmium and lead is to be tested using the test method AAS, ICP-OES or ICP-MS (detection limit 10 ppm).

**The following are exempted:**

Textile elements (*see definition in section 1*), with which the child will not come into contact during normal or expected use of the toy, and where the textile element makes up less than 5% by weight of the toy.

- The applicant must submit a test report for both chromium (total) and chromium (VI), demonstrating fulfilment of the requirement. The analysis laboratory must meet the requirements in Appendix 2.
- The applicant must submit a test report for cadmium and lead, demonstrating fulfilment of the requirement. The analysis laboratory must meet the requirements in Appendix 2.

### O36 Recycled textiles, hide/skins, and leather – Sources

Recycled textile, hide/skin and leather materials may be used for the whole or part of the product. To avoid contamination with undesirable substances from the original use of the textile, the following shall be met:

- Recycled material is not from professional workwear for industry or materials previously used for cleaning.
- Recycled materials must not contain plastic print (e.g. PVC), coatings or details.
- Recycled textiles must originally have been ecolabelled with the Nordic Swan Ecolabel, the EU Ecolabel or GOTS, or have Oeko-Tex 100 Class I Baby certification.
- Recycled hides/skins and leather must meet requirement O32 Origin of hides/skins and leather, and requirement O35 Chromium, cadmium and lead content in leather and hide/skin. Recycled hides/skins and leather that originally carried the Nordic Swan Ecolabel are exempted from this requirement.

All other requirements in section 6 must be fulfilled.

*Recycled textiles, hides/skins, leather, and filler materials are defined here as post-consumer materials or pre-consumer, where it can be documented that the material is a residual material or waste from another business. Fabrics (not fabricated) are only counted as recycled textiles, if it can be documented that more than five years have elapsed since the fabric was originally produced or that they are remains from fabric rolls.*

- ☒ Documentation that the textile, hide/skin, or leather was originally labelled with the ecolabels stated in the requirement or labelled with Oeko-Tex 100 Class I Baby. This may be an original invoice or a label on the textile.
- ☒ Declaration that recycled material from professional workwear for industry or from cleaning cloths has not been used, and that the material does not contain PVC, for example in print, coatings, or details.

## 6.2 Textile elements constituting more than 5% by weight of the toy

The following requirements apply to textile elements that constitute more than 5 wt% of the toy.

For a definition of the terms material element and type, see section 1.

### O37 Halogenated flame retardants

Halogenated flame retardants must not be present<sup>1</sup> in textile elements – not in the actual textile fibre or added to the textile.

<sup>1</sup> See the definition of ingoing substances in section 1.

- ☒ Declaration from the manufacturer/supplier of the material showing compliance with the halogenated flame retardants requirement.

### O38 Chemicals overview

All chemicals\* used in textile elements shall be stated in an overview and documented with safety data sheets for the various processes which the textile undergoes after fibre production, including wet processes (such as washing, bleaching and dyeing), finishing, printing, coating, etc.

All chemical products shall be stated and documented with a safety data sheet. A collective list or separate lists shall be drawn up for each production process and/or supplier.

The following information shall be submitted for each chemical product:

- trade name
- the function of the chemical
- the process step in which the chemical product is used
- the supplier/manufacturer using the chemical product

*\* The requirement applies to all chemicals used in the manufacture of the textile after fibre production, including chemicals used for washing, bleaching, dyeing, printing, and finishing processes such as coating, lamination, or gluing. Chemicals used for carding, spinning, weaving, knitting, wastewater treatment or maintenance of production equipment are exempted from the requirements.*

- List of chemicals for every production process and/or supplier.
- For each chemical: A safety data sheet (in accordance with Annex II of the REACH Regulation (EC) No 1907/2006 and classification in accordance with Regulation (EC) No 1272/2008).

### O39 Classification of chemical products

The requirement concerns all chemicals covered by requirement O38.

Chemical products must not have any of the classifications set out in the table below.

CLP Regulation 1272/2008		
Hazard statement	Hazard class and category	Hazard code
Carcinogenic	Carc. 1A or 1B	H350
	Carc. 2	H351
Mutagenic	Muta. 1A or 1B	H340
	Muta. 2	H341
Reprotoxic	Repr. 1A or 1B	H360
	Repr. 2	H361
	Lact.	H362
Hazardous to the aquatic environment	Aquatic acute 1	H400
	Aquatic chronic 1	H410
	Aquatic chronic 2	H411
Hazardous to the ozone layer	Ozone	H420
Acute toxicity	Acute Tox. 1 or 2	H300
	Acute Tox. 1 or 2	H310
	Acute Tox. 1 or 2	H330
	Acute Tox. 3	H301
	Acute Tox. 3	H311
	Acute Tox. 3	H331
Specific target organ toxicity	STOT SE 1	H370
	STOT RE 1	H372
Sensitising (allergenic)	Resp. sens. 1, 1A or 1B	H334*
	Skin sens. 1, 1A or 1B	H317*

*The classifications in the table concern all classification variants. For example, H350 also comprises the H350i classification.*

*\* Non-disperse dyes are exempt from the prohibition of H334 and H317, provided that non-dusting formulations are used or that automatic dosing is used.*

- Safety data sheet for the chemical product in accordance with current European legislation.

- Declaration from the chemical manufacturer/supplier that the requirement has been fulfilled.
- For exempted non-disperse dyes: Declaration that non-dusting formulations of these are used or that automatic dosing is used.

### 6.3 Requirements that apply to textile elements constituting more than 30% by weight of the toy

The requirements in this section apply to all textile elements that constitute more than 30% by weight of the toy. See the definition of material element in section 1.

#### O40 Bleaching agents

Chlorinated substances shall not be used as bleaching agents. The requirement applies to all types of textile processes, including bleaching of yarn, fabric, or the finished textile.

Declaration from the producer of the yarn, fabric, or finished textile that the requirement is fulfilled.

### 6.4 Fibre requirements – apply to textile types constituting more than 30% by weight of the toy

The requirements in this section apply to all textile types\* that constitute more than 30% by weight of the toy.

The requirements concerning fibre cover the most common fibre types used in toys, with the intention of promoting the variants of each individual fibre type with the best environmental profile.

Filler materials must meet the requirements associated with the relevant fibre in this section. If chemical products are used, the requirements in section 6.2 are to be fulfilled and documented.

Recycled fibre is not subject to any requirements concerning chemicals used in the actual recycling processes. If the recycled material, fabric or finished product is subject to additional processing with chemical products, the requirements in section 6.2 must be fulfilled and documented.

\* See the definition of material type in section 1.

#### O41 Cotton fibres

Cotton and other natural seed fibres of cellulose (including kapok) must be organically cultivated\* or recycled\*\*.

\* *Organic cotton means cotton fibre that is certified as organic or transitioning to organic according to a standard approved in the IFOAM Family of Standards, such as Regulation (EU) 2018/848, USDA National Organic Program (NOP), APEDA's National Programme for Organic Production (NPOP), China Organic Standard GB/T19630. Also approved are GOTS and DEMETER and certification as "transitioning to organic cultivation". The certification body must have the accreditation required for the standard, such as ISO 17065, NOP or IFOAM.*



*\*\* Recycled fibres or materials: Pre-consumer or post-consumer recycled raw materials, see the definition in the ISO 14021 standard. Both mechanically and chemically recycled fibres are included. See the definitions in section 1 for more details.*

- ☒ Organic cotton: Valid certificate showing that the cotton in the Nordic Swan Ecolabelled product was organically cultivated in line with the standards in the requirement. If the supplier is the holder of GOTS certification, the requirement must be documented with a transaction certificate showing that the goods supplied are GOT certified.
- ☒ Recycled fibres: Fulfilment of the requirement is documented for recycled fibre with either a) and/or b) below:
  - a) Certificate showing that the raw material is 100% recycled (post and / or pre-consumer) with Global Recycled Standard certificate 4.0 (or later versions), or other equivalent certification approved by Nordic Ecolabelling.
  - b) Present documentation demonstrating that the recycled fibre was purchased as 100% recycled (post and / or pre-consumer) and state the supplier.

#### O42 Synthetic fibre – Fossil origin

Synthetic fibre of fossil origin must comprise a minimum of 50% recycled material.\*

The requirement is to be documented with either a) or b) below:

- a) Global Recycled Standard certificate showing that the raw material is recycled, or other equivalent certification approved by Nordic Ecolabelling.
- b) By stating the producer of the recycled raw material and documenting that the feedstock used in the raw material is recycled material, see definition in requirement.

*\*Recycled fibre or material: Pre-consumer or post-consumer recycled raw materials, as defined in standard ISO 14021. Both mechanical and chemical recycling are included. See the definition in section 1.*

- ☒ a) Certificate from an independent certifier of the supply chain (e.g. Global Recycled Standard).
- ☒ b) Documentation from the producer, showing that the feedstock used in the raw material is recycled material, see definition in requirement.
- ☒ Calculation showing that at least 50% of the synthetic fibre of fossil origin comprises of recycled material.

#### O43 Synthetic fibre – Bio-based origin

Palm oil, soya oil and soya flour must not be used as raw materials for bio-based polymers.

Raw materials used for bio-based polymers must also meet one of the requirements below:

- Be secondary raw materials\*.
- Primary raw materials (e.g. maize, sugar cane and sugar beet) must not be genetically modified organisms (GMO)\*\*. Sugar cane must in addition be Bonsucro certified\*\*\*.

*\* Secondary raw materials are defined here as waste products from other production, e.g. by-products such as straw from grain production and by-products from maize. PFAD (Palm Fatty Acid Distillate) from palm oil is not considered a secondary raw material and therefore must not be used.*

*\*\* Genetically modified organisms are defined in EU Directive 2001/18/EC.*



\*\*\* *The producer of the bio-based polymer must hold Bonsucro's chain of custody (CoC) certification. The chain of custody must be ensured through mass balance. Book and claim systems are not accepted. The manufacturer of the bio-based polymer must document its purchase of certified raw materials for polymer production, for example in the form of specifications on an invoice or delivery note.*

*Nordic Ecolabelling may, if appropriate, consider other certification systems.*

- ☒ Declaration from the polymer manufacturer that palm oil (incl. PFAD (Palm Fatty Acid Distillate)), soya oil and soya flour are not used as raw materials in the bio-based polymer.
- ☒ For secondary raw materials: Documentation from the polymer manufacturer showing compliance with the requirement's definition of secondary raw materials. The chain of custody must be traceable back to the production/process that generated the residual product.
- ☒ For primary raw materials (incl. certified sugar cane): Declaration from the polymer manufacturer that the raw materials are not GMO under the terms of the requirement.
- ☒ For sugar cane: Copy of a valid CoC certificate or a certificate number. Documentation such as an invoice or delivery note from the producer of the bio-based polymer, showing the purchase of bio-based polymer from certified raw material in at least the same annual quantity as is used in the production of the bio-based polymer.

#### O44 Wool and other keratin fibres

Any wool and other keratin fibres used must originate from sheep, camels, alpaca, or goats, and must be one of the following:

1. certified organic wool\*
2. recycled wool\*\*
3. certified Oeko-Tex Standard 100 class I baby  
or
4. conventional wool with documentation that the requirement below concerning pesticide content in the raw wool is fulfilled.

Pesticide content in conventional wool:

- The total content of the following substances may not exceed 0.5 ppm:  $\gamma$ -hexachlorocyclohexane (lindane),  $\alpha$ -hexachlorocyclohexane,  $\beta$ -hexachlorocyclohexane,  $\delta$ -hexachlorocyclohexane, aldrin, dieldrin, endrin, p,p'-DDT and p,p'-DDD, cypermethrin, deltamethrin, fenvalerate, cyhalothrin and flumethrin.
- The total content of the following substances may not exceed 2 ppm: diazinon, propetamphos, chlorfenvinphos, dichlorfenthion, chlorpyrifos, fenchlorphos, dicyclanil, diflubenzuron and triflumuron.
- The requirement to test for pesticide residues does not apply if documentation can show which farmers produced at least 75% by weight of the wool or keratin fibres, and those farmers can confirm that the substances named in the requirement have not been used in the areas or on the animals in question.

Test method: The tests must be performed in accordance with IWTO Draft Test Method 59: Method for the Determination of Chemical Residues on Greasy Wool or equivalent.

The analysis must be performed on raw wool before wet processing and the test report must be submitted with the application.

Thereafter, the applicant must have a procedure in place for annual testing in line with the requirement and for ensuring compliance with the requirement. Nordic Ecolabelling must be informed if the requirement is not fulfilled.

*\* Definition of organic wool: wool fibre that is certified as organic or transitioning to organic according to a standard approved in the IFOAM Family of Standards, such as Regulation (EU) 2018/848, USDA National Organic Program (NOP), APEDA's National Programme for Organic Production (NPOP), China Organic Standard GB/T19630. Also approved are GOTS and DEMETER and certification as "transitioning to organic cultivation". The certification body must have the accreditation required for the standard, such as ISO 17065, NOP or IFOAM.*

*\*\* Definition of recycled wool: Pre-consumer or post-consumer recycled raw materials, see the definition in the ISO 14021 standard. Both mechanically and chemically recycled fibres are included. See the definitions in section 1 for more details.*

- Organic wool: Valid certificate showing that the wool in the Nordic Swan Ecolabelled product was organically cultivated in line with the standards in the requirement. If the supplier is the holder of GOTS certification, the requirement must be documented with a transaction certificate showing that the goods supplied are GOTS certified.
- Recycled fibre: Fulfilment of the requirement is documented for recycled fibre with either a) or b) below. In addition, recycled wool must live up to requirement O46:
  - a) Global Recycled Standard certificate showing that the raw material is recycled, or other equivalent certification approved by Nordic Ecolabelling.
  - b) Present documentation demonstrating that the recycled fibre was purchased as recycled and state the supplier.
- Oeko-Tex 100 Class I Baby: Valid certificate
- Conventional wool: Declaration from the wool supplier that no mulesing has been used.
- Conventional wool: In addition, a test report showing that the pesticide requirement has been fulfilled, plus a written procedure showing how an annual test is performed in line with the pesticide requirement, along with annual in-house checks of compliance with the requirement. Test results are to be archived and kept available for inspection by Nordic Ecolabelling. An alternative to the pesticide test is a confirmation from the farmers that the stated substances are not used, plus an overview of the proportion of wool concerned.

#### O45 Wool - Ban on mulesing

Surgical mulesing and mulesing performed using liquid nitrogen are not permitted on merino sheep.

- Declaration from the merino wool producer, stating that no mulesing has taken place.

#### O46 Recycled fibres - Test for environmentally harmful substances

This requirement applies to all recycled fibres – both synthetic and natural. Recycled fibres/raw materials for fibre production shall not contain the following substances above the limits stated in the table below.

The requirement must be documented on application, with subsequent annual checks and submitting to Nordic Ecolabelling.

Substance/substance group	Max. limit
<b>Metals</b>	
Chromium total	1.0 mg/kg
Lead	0.1 mg/kg
Mercury	0.02 mg/kg
Cadmium	0.1 mg/kg
Antimony	30.0 mg/kg
<b>Organic tin compounds</b>	
TBT and TPhT	0.5 mg/kg
Total of DBT, DMT, DOT, DPhT, DPT, MOT, MMT, MPhT, TeBT, TeET, TCyHT, TMT, TOT, TPT	1.0 mg/kg
<b>Chlorophenols</b>	
Pentachlorophenol	0.05 mg/kg
Tetrachlorophenol	0.05 mg/kg
Trichlorophenol	0.2 mg/kg
Dichlorophenol	0.5 mg/kg
Monochlorophenol	0.5 mg/kg
<b>Per- and polyfluorinated compounds</b>	
PFOS, PFOSA, PFOSF, N-Me-FOSA, N-Me-FOSE, N-Et-FOSE	Total < 1.0 µg/m <sup>2</sup>
PFOA	< 1.0 µg/m <sup>2</sup>
PFHpA, PFNA, PFDA, PFUdA, PFDoA, PFTTrDA, PFTTeDA	0.05 mg/kg for each
Other stated per- and polyfluorinated compounds as set out in Oeko-Tex 100 Annex 5.	0.05 or 0.5 mg/kg for each as stated in Oeko-Tex 100
<b>Phthalates</b>	
BBP, DBP, DEP, DMP, DEHP, DMEP, DIHP, DHNUP, DCHP, DHxP, DIBP, DIHxP, DIOP, DINP, DIDP, DPrP, DHP, DNOP, DNP, DPP	Total 0.1 wt%
<b>Flame retardants</b>	
Flame retardants, with the exception of flame retardants approved by Oeko-Tex	< 100 mg/kg for each
Formaldehyde	16 mg/kg
Arylamines with carcinogenic properties stated in Oeko-Tex 100 Annex 5	Total 20 mg/kg
<b>Surfactant, wetting agent residues</b>	
Nonylphenol, octylphenol, heptylphenol, pentylphenol	Total 10 mg/kg
Nonylphenol, octylphenol, heptylphenol, pentylphenol, nonylphenol ethoxylate and octylphenol ethoxylate	Total 100 mg/kg
<b>Dyes</b>	
Cleavable, classified as carcinogenic in Oeko-Tex Annex 5	Total 20 mg/kg
Cleavable aniline as listed in Oeko-Tex Annex 5	Total 100 mg/kg
Classified as carcinogenic in Oeko-Tex Annex 5	50 mg/kg
Dyes classified as allergenic in Oeko-Tex Annex 5	50 mg/kg
Other dyes listed in Oeko-Tex Annex 5	50 mg/kg
<b>Pesticides (for recycled natural fibre)</b>	
Pesticides listed in Oeko-Tex 100 Annex 5	Total 0.5 mg/kg

Test methods: as stated in Testing Methods Standard 100 by Oeko-Tex

- Test reports or Oeko-Tex 100 class I certificate showing fulfilment of the requirement. The analysis laboratory must meet the requirements in Appendix 2.
- A written procedure showing how an annual test is performed in line with the requirement, along with annual in-house checks of compliance with the requirement. Test results are to be archived and yearly send to Nordic Ecolabelling.

## 7 Filler materials

The requirements in this section relate to filler materials made of down, feathers and other renewable raw materials. Such other renewable raw materials may be seeds, kernels, rice, etc.

Filler materials made of textile fibre must comply with the requirements in section 6. E.g. polyester must, among other things, meet requirement O33 concerning formaldehyde.

Filler materials made of plastic (incl. bioplastic), foam, rubber (latex) or silicone must comply with the requirements in section 5.

Filler materials made of wood or bamboo (e.g. wood pellets) must comply with the requirements in section 10. Requirements O49 and O50 in this section must also be fulfilled.

### 7.1 Requirements that apply irrespective of amount in product

The requirements in this section concern all types of filler material. See the definition of material type in section 1.

#### O47 Feathers and down - ethical requirements.

Use of feathers and down plucked from live birds is prohibited.

Forced feeding of birds is prohibited.

Recycled\* down and feathers are exempt from the requirement, but documentation for traceability shall be provided to confirm that the down and feathers are recycled.

*\* Recycled down and feathers are defined here as post-consumer recycled down and feathers in line with standard ISO 14021.*

- Responsible Down standard or a certificate from another standard that fulfils the requirement.
- Recycled down and feathers: Recycled Global Standard certificate. Alternatively, documentation from the supplier, confirming that the down/feathers are post-consumer recycled down or feathers.

#### O48 Feathers and down - Microbial cleanliness

Feathers and down must comply with the following to document microbial cleanliness:

- oxygen index number of max. 10
- fat content must lie within the range 0.5% to 2.0%

Determined in accordance with the standards:

- EN 12935 Feather and down – Hygiene and cleanliness requirements,
- EN 1162 “Feathers and down. Test methods – Determination of the oxygen index number”
- and EN 1163 Feather and down – Test methods – Determination of the oil and fat content.

- Microbial cleanliness: Test report showing compliance with the requirement. The analysis laboratory must meet the requirements in Appendix 2.

#### O49 Other renewable raw materials – Microbial cleanliness

Other renewable raw materials such as seeds, kernels, rice, wood pellets, etc. must meet the following conditions:

- TAMC (total aerobic microbial count): max  $10^3$
- TYMC (total combined yeasts/moulds count): max  $10^2$

Determined in accordance with standards:

- Ph. Eur. 5.1.4. Microbiological Quality of Non-sterile Pharmaceutical Preparations and Substances for Pharmaceutical Use,
- Ph. Eur. 2.6.12. – Microbiological Examination of Non-sterile Products: Microbial Enumeration Tests
- and Ph. Eur. 2.6.13. – Microbiological Examination of Non-sterile Products: Test for Specified Micro-organisms.

- Microbial cleanliness: Test report documenting compliance with the requirement. The analysis laboratory must meet the requirements in Appendix 2.

#### O50 Chemical additives and treatments

All chemical additives and treatments used on feathers and down shall comply with the requirements in section 6.2.

Other renewable raw materials must have no chemical additives or chemical treatments.

Other filler materials must meet the chemical requirements described in the section for the relevant material type (see references in the introduction to section 7)

- Feathers and down: Documentation as set out in the requirements in section 6.2.
- Other renewable raw materials: Declaration from the applicant that no chemical additives or chemical treatments have been used.

## 8 Metal

The requirements in this section concern material elements and types made of metal. See the definition of the terms material element and metal type in section 1.

### 8.1 Requirements that apply irrespective of amount in product

The requirements in this section concern all product elements made of metal. See the definition of material element in section 1.

#### O51 Copper, tin, lead, and cadmium

Components made of copper, tin, lead, and cadmium must not be used in the toy.

- Declaration from the applicant that these metals are not used.

#### O52 Third-party control of test from EN 71 in EU Toy Safety Directive

The following tests from the safety requirements in EN 71 are to be submitted for all the metal materials with which the child may come into contact:

EN 71-3: Toys – Safety requirements – Part 3: Migration of certain elements

Where metal elements have had a surface treatment applied, that surface treatment must also be tested.

- Test report in relation to EN 71-3 for metal elements, showing fulfilment of the requirement. Plus, declaration from the test laboratory confirming conformity with the requirements in EN 71-3 for the types of toys for which the application is being made. The analysis laboratory must meet the requirements in Appendix 2.

### O53 Surface treatment – Chemical products, Classification

Chemical products used for the surface treatment of metal elements in the product must not have any of the classifications listed in the table below.

Surface treatment in the form of metallisation is not covered by this requirement. See instead requirements O56 and O57 Metal coating.

In addition, surface treatments of metal elements must not negatively affect recyclability.

**Table: List of non-permitted classifications of chemical product**

CLP Regulation 1272/2008		
Hazard statement	Hazard class and category	Hazard code
Carcinogenic	Carc. 1A or 1B	H350
	Carc. 2	H351
Mutagenic	Muta. 1A or 1B	H340
	Muta. 2	H341
Reprotoxic	Repr. 1A or 1B	H360
	Repr. 2	H361
	Lact.	H362
Hazardous to the aquatic environment	Aquatic acute 1	H400
	Aquatic chronic 1	H410
	Aquatic chronic 2	H411
Hazardous to the ozone layer	Ozone	H420
Acute toxicity	Acute Tox. 1 or 2	H300
	Acute Tox. 1 or 2	H310
	Acute Tox. 1 or 2	H330
	Acute Tox. 3	H301
	Acute Tox. 3	H311
	Acute Tox. 3	H331
	Acute Tox. 4	H302
	Acute Tox. 4	H312
	Acute Tox. 4	H332
Specific target organ toxicity	STOT SE 1	H370
	STOT RE 1	H372
	STOT RE 2	H371
	STOT SE 2	H373
Sensitising (allergenic)	Resp. sens. 1, 1A or 1B	H334
	Skin sens. 1, 1A or 1B	H317

*The classifications in the table concern all classification variants. For example, H350 also comprises the H350i classification.*

- Safety data sheet compliance with current European legislation.
- Declaration from the manufacturer/supplier of the chemical used for surface treatment showing that the requirement is fulfilled.
- Declaration from the applicant or the manufacturer/supplier of the surface treated metal element, confirming that the surface treatment does not negatively affect recyclability.

### O54 Surface treatment – Ingoing substances, Classification

The ingoing substances<sup>1</sup> used in chemical products for surface treatment must not have any of the classifications listed in the table below.

Surface treatment in the form of metallisation is not covered by this requirement. See instead requirements O56 and O57 Metal coating.

<sup>1</sup> See the definition of ingoing substances in section 1.

**Table: List of non-permitted classifications of ingoing substances in additives**

CLP Regulation 1272/2008		
Hazard statement	Hazard class and category	Hazard code
Carcinogenic	Carc. 1A or 1B Carc. 2	H350 H351
Mutagenic	Muta. 1A or 1B Muta. 2	H340 H341
Reprotoxic	Repr. 1A or 1B Repr. 2 Lact.	H360 H361 H362

*The classifications in the table concern all classification variants. For example, H350 also comprises the H350i classification.*

- ☒ Declaration from the manufacturer/supplier of the chemical used for surface treatment showing that the requirement is fulfilled.
- ☒ Chemical products with a licence for Nordic Swan Ecolabelled Chemical building products automatically fulfil requirements. In such case, product type, manufacturer and licence number must be stated as documentation.

## O55 Surface treatment – Prohibited substances

The requirement concerns all constituent substances<sup>1</sup> in the chemical products used in the surface treatment of the metal. Coatings with metals (metallisation) are exempted from this requirement, but must comply with requirements O56 and O57.

### The following substances must not be present<sup>1</sup>:

- Substances on the EU's Candidate List in accordance with REACH, 1907/2006/EC, article 59, section 10 on the European Chemicals Agency (ECHA) website.
- Substances that are assessed by the EU to be PBT substances (persistent, bioaccumulative and toxic substances) or vPvB substances (very persistent and very bioaccumulative) in accordance with the criteria in Annex XIII of REACH.
- Substances that are considered to be potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects. The list can be found here:  
[http://ec.europa.eu/environment/chemicals/endocrine/pdf/final\\_report\\_2007.pdf](http://ec.europa.eu/environment/chemicals/endocrine/pdf/final_report_2007.pdf)

In addition, the following substances and substance groups must not be present<sup>1</sup>. There may be overlaps between the substances on the following item list and the substances or groups of substances of which the properties are listed above:

- Halogenated organic compounds<sup>2</sup> (e.g. organic chloroparaffins, fluorine compounds, halogenated flame retardants, chlorophenols, etc.). The following are exempted:
  - Bronopol up to 0.05 wt%
  - The blend (3:1) of CMIT/MIT (5-chloro-2-methyl-4-isothiazolin-3-one; 2-methyl-4-isothiazolin-3-one) up to 0.0015 wt%
  - IPBC (iodopropynyl butylcarbamate) up to 0.20 wt%



- Pigment which complies with EU requirements for dyes in plastic materials in contact with food under Resolution AP (89) point 2.5.
- Isothiazolinones (total) at more than 0.05 wt%
- Bisphenol A, S and F
- Alkylphenols, alkylphenol ethoxylates or other alkylphenol derivatives<sup>3</sup>
- Butyl hydroxytoluene (BHT) and butyl hydroxyanisole (BHA)
- Phthalates<sup>4</sup>
- Pigments and additives based on lead, tin, cadmium, chromium (VI), mercury, antimony, arsenic and their compounds
- Volatile aromatic hydrocarbons (VAH)<sup>5</sup>
- Volatile aromatic compounds (VOC) at more than 3 wt%<sup>6</sup>

<sup>1</sup> See the definition of ingoing substances in section 1.

<sup>2</sup> Be aware of national legislation concerning PFOA if the product is to be sold/marketed in Norway. In Norway, PFOA is governed by the "Regulation on restrictions to the use of health- and environmentally hazardous chemicals and other products (Product Regulations)", Section 2-32.

<sup>3</sup> Alkylphenol derivatives are defined as substances released from alkylphenols on degradation.

<sup>4</sup> Phthalates are esters of 1,2-benzenedicarboxylic acid (orthophthalic acid).

<sup>5</sup> Volatile aromatic hydrocarbons (VAH) are defined as aromatic compounds whose boiling point is max 250°C, measured at a standard pressure of 101.3 kPa.

<sup>6</sup> Volatile organic compounds (VOC) are defined as organic substances with an initial boiling point of max 250°C measured at a standard pressure of 101.3 kPa.

- Declaration from the chemical product manufacturer/supplier showing that the requirement is fulfilled.

## O56 Coating with metals (metallisation)

Metal elements shall not be coated with cadmium, chromium, nickel, copper, tin, lead, zinc, and their compounds.

However, zinc surface treatment of small metal elements (e.g. screws, bolts, fittings) or other metal elements is accepted, if this is necessary due to extensive physical wear or on safety-related grounds.

For surface treatment with zinc, see also requirement O57.

- Declaration from the toy manufacturer describing which parts are surface treated and the type of surface treatment.

## 8.2 Requirements that apply to metal types constituting over 5% by weight of the toy

The requirements in this section apply to metal types that constitute more than 5 wt% of the toy. See the definition of material type in section 1.

### O57 Metal coating with metals (metallisation) – Facility that carries out surface treatment with zinc

Metal types that are surface treated with zinc must comply with requirement O56. See the definition of material type in section 1.

If the surface treated metal types constitute more than 5 wt% of the toy, the following requirements must be met:



- The facility must be a closed-loop wastewater system, i.e. there are no discharges to recipient watercourses/municipal water treatment plants.
- Residual products from the surface treatment must be sent for recycling or destruction by an operator that is approved for the handling of hazardous waste.

If surface treatment takes the form of electro galvanisation, the following applies:

- Cyanide must not be used in the process baths.
- Passivation baths must be cobalt-free.

- Documentation/description demonstrating that the facility is wastewater-free.
- State which waste management operator receives residual products, plus description from the supplier of the surface treatment stating what happens with the residual products.
- For electro galvanisation: Declaration from the supplier of the surface treatment stating that cyanide is not used in the process baths and that cobalt-free passivation baths are used.

### 8.3 Requirements that apply to metal types constituting more than 30% by weight of the toy

The requirements in this section apply to metal types that constitute more than 30 wt% of the toy. See the definition of material type in section 1.

Small elements such as screws, bolts, fittings, buttons and suchlike are excluded from the calculation of the wt% of the toy.

#### O58 Percentage of recycled metal

It is possible to document the percentage of recycled metal using either alternative 1 or 2.

##### **Alternative 1:**

70% by weight of aluminium and 70% by weight of steel must be recycled\*.

##### **Alternative 2:**

Together, aluminium and steel must meet the following requirement for the percentage of recycled\* metal:

$$\text{recycledAl} * \text{kgAl} + \text{recycledSteel} * \text{kgSteel} \geq 0.70 * \text{kgAl} + 0.70 * \text{kgSteel}$$

Where:

kgAl and kgSteel are the weight of aluminium and steel respectively in kg.

recycledAl and recycledSteel are the percentage of recycled aluminium and steel respectively which must be stated as a number between 0 and 1 (corresponding to 0% to 100%).

The smelter must declare the percentage of recycled materials used in production. An annual average for the smelter is accepted.

The supply chain must be stated and there must be traceability all through the supply chain, from the smelter to the finished product, so that the percentage of recycled materials is guaranteed along the entire supply chain.

Information about recycled materials must be shown on the invoice or be documented with a declaration from the supplier about the percentage of recycled materials.

The supplier can confirm the percentage of recycled materials in its products by providing an overview of the quantity of recycled materials purchased and the quantity sold. There must be an agreement between the supplier and the manufacturer of the Nordic Ecolabelled production that the recycled material is sold to the Nordic Ecolabelled production.

*\* Recycled metal is defined as both pre-consumer and post-consumer, c.f. the definition given in ISO 14021. See definition in section 1.*

- State the percentage of recycled metal in the product.
- A declaration from the smelter of the percentage of recycled metal used in its production (on an annual basis). Supply chain traceability must be documented, e.g. as a flowchart. The percentage of recycled metal in the supply chain must be documented, e.g. with information on the invoice or a declaration from the supplier. The percentage of recycled content for Al can be documented with the certification Hydro Circal.

## 9 Paper, paperboard, and cardboard

The requirements in this section concern material elements and types made of paper, paperboard, or cardboard.

Printed matter with a valid licence for the Nordic Swan Ecolabel or the EU Ecolabel automatically meet requirements O60, O61 and O62.

Copy and printing paper with a valid licence for the Nordic Swan Ecolabel or the EU Ecolabel automatically meets requirements O63 and O64.

Sales packaging and user instructions for the toy are not covered by the requirements in this section, but printed matter, boxes and so on that are employed during the use of the toy (e.g. the box for a jigsaw puzzle) are covered by this section. If the box for a board game is used in the game, the box is subject to the requirements in this section.

### 9.1 Requirements that apply irrespective of amount in product

The requirements in this section concern all product elements made of paper, paperboard, or cardboard. For the definition of material element see section 1.

#### O59 Third-party control of test from EN 71 in EU Toy Safety Directive

The following tests for the paper, paperboard and cardboard elements used must be submitted for toys or elements of toys:

EN 71-3: Toys – Safety requirements – Part 3: Migration of certain elements

The requirement applies only to types of toys covered by the standards above.

If the paper, paperboard, and cardboard elements have had a surface treatment applied (e.g. printing), that surface treatment must also be tested.

- Test report in relation to EN 71-9 for the paper, paperboard and cardboard elements used, showing fulfilment of the requirement. Plus, declaration from the test laboratory confirming conformity with the requirements in EN 71-3 for the types of toys for which the application is being made. The analysis laboratory must meet the requirements in Appendix 2.

## O60 Printing and surface treatment – Chemical products, Classification

The requirement covers all chemical products used in printing on or surface treatment of paper, paperboard, or cardboard.

The chemical products used must not have any of the classifications listed in the table below. The chemical product must be classified in accordance with current European legislation.

**Table: List of non-permitted classifications of chemical products**

CLP Regulation 1272/2008		
Hazard statement	Hazard class and category	Hazard code
Carcinogenic	Carc. 1A or 1B	H350
	Carc. 2	H351
Mutagenic	Muta. 1A or 1B	H340
	Muta. 2	H341
Reprotoxic	Repr. 1A or 1B	H360
	Repr. 2	H361
	Lact.	H362
Hazardous to the aquatic environment	Aquatic acute 1	H400
	Aquatic chronic 1	H410
	Aquatic chronic 2	H411
	Aquatic chronic 3	H412
	Aquatic chronic 4	H413
Hazardous to the ozone layer	Ozone	H420
Acute toxicity	Acute Tox. 1 or 2	H300
	Acute Tox. 1 or 2	H310
	Acute Tox. 1 or 2	H330
	Acute Tox. 3	H301
	Acute Tox. 3	H311
	Acute Tox. 3	H331
Specific target organ toxicity	STOT SE 1	H370
	STOT RE 1	H372
Sensitising (allergenic)	Resp. sens. 1, 1A or 1B	H334
	Skin sens. 1, 1A or 1B	H317

*The classifications in the table concern all classification variants. For example, H350 also comprises the H350i classification.*

Exemptions:

- Chemicals for film and printing plate production are exempted from the requirement concerning classification with H411 and/or H412.
- The exemption from the requirement concerning environmental hazard classification applies to products such as printing inks, toners and varnishes that are radiation-cured (e.g. UV inks, UV toners and UV varnishes).
- Adhesive products that contain isocyanates are exempted. However, they may only be used in a closed process with the prescribed protective equipment in accordance with the official requirements.

- Safety data sheet for the chemical product in accordance with current European legislation.
- Declaration from the manufacturer/supplier of the chemical product used for printing, confirming fulfilment of the requirement.
- If adhesive products containing isocyanates are used: Declaration from printing company that the requirement is fulfilled.

## O61 Printing and surface treatment – Ingoing substances, Classification

The requirement covers all ingoing substances<sup>1</sup> in the chemical products used in printing on or surface treatment of paper, paperboard, or cardboard.

**Table: List of non-permitted classifications of ingoing substances**

CLP Regulation 1272/2008		
Hazard statement	Hazard class and category	Hazard code
Carcinogenic	Carc. 1A or 1B Carc. 2	H350 H351
Mutagenic	Muta. 1A or 1B Muta. 2	H340 H341
Reprotoxic	Repr. 1A or 1B Repr. 2 Lact.	H360 H361 H362

*The classifications in the table concern all classification variants. For example, H350 also comprises the H350i classification.*

<sup>1</sup> See the definition of ingoing substances in section 1.

**Exemption:**

Adhesive products that contain isocyanates are exempted. However, they may only be used in a closed process with the prescribed protective equipment in accordance with the official requirements.

- Declaration from the manufacturer/supplier of the chemical product used for printing, confirming fulfilment of the requirement.
- If adhesive products containing isocyanates are used: Declaration from printing company that the requirement is fulfilled.

**O62 Printing and surface treatment – Other prohibited substances**

The requirement covers all ingoing substances<sup>1</sup> in the chemical products used in printing on or surface treatment of paper, paperboard, or cardboard.

**The following substances must not be present<sup>1</sup>:**

- Substances on the EU's Candidate List in accordance with REACH, 1907/2006/EC, article 59, section 10 on the European Chemicals Agency (ECHA) website.
- Substances that are assessed by the EU to be PBT substances (persistent, bioaccumulative and toxic substances) or vPvB substances (very persistent and very bioaccumulative) in accordance with the criteria in Annex XIII of REACH.
- Substances that are considered to be potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects. The list can be found here:  
[http://ec.europa.eu/environment/chemicals/endocrine/pdf/final\\_report\\_2007.pdf](http://ec.europa.eu/environment/chemicals/endocrine/pdf/final_report_2007.pdf)

In addition, the following substances and substance groups must not be present<sup>1</sup>. There may be overlaps between the substances on the following item list and the substances or groups of substances of which the properties are listed above:

- Halogenated organic compounds<sup>2</sup> (e.g. organic chloroparaffins, fluorine compounds, halogenated flame retardants, chlorophenols, etc.). The following are exempted:
  - Bronopol up to 0.05 wt%
  - The blend (3:1) of CMIT/MIT (5-chloro-2-methyl-4-isothiazolin-3-one; 2-methyl-4-isothiazolin-3-one) up to 0.0015 wt%
  - IPBC (iodopropynyl butylcarbamate) up to 0.20 wt%

- Pigment which complies with EU requirements for dyes in plastic materials in contact with food under Resolution AP (89) point 2.5.
- Isothiazolinones (total) at more than 0.05 wt%
- Bisphenol A, S and F
- EDTA (ethylene diamine tetra acetate) and its salts
- Sodium and potassium hypochlorite
- Alkylphenols, alkylphenol ethoxylates or other alkylphenol derivatives<sup>3</sup>
- Butyl hydroxytoluene (BHT) and butyl hydroxyanisole (BHA)
- Phthalates<sup>4</sup>
- Pigments and additives based on lead, tin, cadmium, chromium (VI), mercury, antimony, arsenic and their compounds
- Volatile aromatic hydrocarbons (VAH)<sup>5</sup>
- Volatile aromatic compounds (VOC) at more than 3 wt%<sup>6</sup>

<sup>1</sup> See the definition of ingoing substances in section 1.

<sup>2</sup> Be aware of national legislation concerning PFOA if the product is to be sold/marketed in Norway. In Norway, PFOA is governed by the "Regulation on restrictions to the use of health- and environmentally hazardous chemicals and other products (Product Regulations)", Section 2-32.

<sup>3</sup> Alkylphenol derivatives are defined as substances released from alkylphenols on degradation.

<sup>4</sup> Phthalates are esters of 1,2-benzenedicarboxylic acid (orthophthalic acid).

<sup>5</sup> Volatile aromatic hydrocarbons (VAH) are defined as aromatic compounds whose boiling point is max 250°C, measured at a standard pressure of 101.3 kPa.

<sup>6</sup> Volatile organic compounds (VOC) are defined as organic substances with an initial boiling point of max 250°C measured at a standard pressure of 101.3 kPa.

#### **Exemptions:**

- EDTA and its salts may be used in chemicals for printing plate production (repro) if the proportion of EDTA and its salts does not exceed 1% of the chemical product.
- Declaration from the manufacturer/supplier of the chemical product used for printing, confirming fulfilment of the requirement.
- Printed matter with a licence for the Nordic Swan Ecolabel or EU Ecolabel automatically fulfils the requirement. In such case, product type, manufacturer and licence number must be stated as documentation.

## **9.2 Requirements that apply to paper, paperboard and cardboard types constituting more than 10% by weight of the toy**

The requirements in this section apply to paper, paperboard and cardboard types constituting more than 10 wt% of the toy. See the definition of material type in section 1.

### **O63 Fibre raw materials – Prohibited tree species**

Species of trees on the Nordic Ecolabel list of protected tree species ([www.nordic-ecolabel.org/wood/](http://www.nordic-ecolabel.org/wood/)) must not be used.

- Declaration from the applicant/manufacturer/supplier that the requirement is fulfilled.

## O64 Fibre raw material – Traceability and certification

### Species name

The manufacturer/supplier of the paper/paperboard/cardboard must state the name (species) of the fibre raw material used.

Manufacturers/suppliers that only use recycled material\* are exempted from this requirement.

### Chain of Custody certification

Manufacturers/suppliers of paper/paperboard/cardboard must have Chain of Custody certification under the FSC/PEFC schemes.

This requirement also applies to manufacturers/suppliers that use recycled material\*.

### Certified fibre raw material

At least 70% of the fibre raw material used in paper/paperboard/cardboard must be certified as originating from sustainable forestry under the FSC or PEFC schemes.

The remaining percentage of fibre raw material must be covered by the FSC/PEFC compliance schemes (FSC Controlled Wood/PEFC Controlled Sources).

This requirement also applies to recycled material\*.

**\* Recycled material:** *Pre-consumer or post-consumer recycled raw materials, see the definition in the ISO 14021 standard. See the definitions in section 1 for more details.*

*Nordic Ecolabelling includes by-products from primary wood processing industries (sawdust, wood chips, shavings, bark etc.) or residues from forestry operations (bark, branches, roots, etc) in its definition of recycled material.*

- Name (species name) of the fibre raw materials used.
- A valid FSC/PEFC Chain of Custody certificate from the manufacturer/supplier that covers all the fibre raw material in the paper/paperboard/cardboard.
- If the toy manufacturer is Chain of Custody certified: A manufacturer that has FSC/PEFC Chain of Certification must submit documentation showing compliance with the requirement for the percentage of certified material through the applicant/manufacturer's Chain of Custody account.
- If a supplier holds Chain of Custody certification, the toy manufacturer must show that it purchases certified fibre raw material. This is to be verified via invoices stating the proportion of certified material purchased.
- Declaration of compliance with the requirement for the percentage of certified material or recycled material through the manufacturer/supplier's Chain of Custody account.

## 10 Solid wood and bamboo

The requirements in this section concern material elements and types made of solid wood and bamboo.

Recycled solid wood and bamboo are exempted from requirement O71.

Nordic Swan Ecolabelled durable wood with a valid licence is exempted from requirements O66 and O71.

Chemical products that have a valid licence for Nordic Swan Ecolabelled Indoor paints and varnishes, Nordic Swan Ecolabelled Chemical building products or EU Ecolabelled Indoor and outdoor paints and varnishes are exempted from requirements O68, O69 and O70.

## 10.1 Requirements that apply irrespective of amount in product

The requirements in this section concern all product elements made of solid wood or bamboo. See the definition of material elements in section 1.

### O65 Third-party control of test from EN 71 in EU Toy Safety Directive

The following tests for the wood and bamboo elements used must be submitted for toys or elements of toys:

EN 71-3: Toys – Safety requirements – Part 3: Migration of certain elements

The requirement applies only to types of toys covered by the standards above.

If the wood and bamboo elements have had a surface treatment applied (e.g. paint, varnish), that surface treatment must also be tested.

- ☒ Test report in relation to EN 71-9 for the paper, paperboard and cardboard elements used, showing fulfilment of the requirement. Plus, declaration from the test laboratory confirming conformity with the requirements in EN 71-3 for the types of toys for which the application is being made. The analysis laboratory must meet the requirements in Appendix 2.

### O66 Prohibited tree species

Species of trees on the Nordic Ecolabel list of protected tree species

([www.nordic-ecolabel.org/wood/](http://www.nordic-ecolabel.org/wood/)) must not be used.

- ☒ Declaration from the applicant/manufacturer/supplier that the requirement is fulfilled.

### O67 Chemicals in recycled elements

Recycled elements in wood or bamboo must be untreated.

State the previous area of use for the recycled element. Wood from industrial construction must not be used.

- ☒ Declaration of what the recycled element in wood/bamboo has previously been used for, plus a declaration that it is untreated. Nordic Ecolabelling may require further information if there is any doubt about compliance with the requirement.

### O68 Surface treatment – Chemical products, Classification

Chemical products used for the surface treatment of the wood and bamboo elements must not have any of the classifications listed in the table below.

**Table: List of non-permitted classifications of chemical products**

CLP Regulation 1272/2008		
Hazard statement	Hazard class and category	Hazard code
Carcinogenic	Carc. 1A or 1B	H350
	Carc. 2	H351
Mutagenic	Muta. 1A or 1B	H340
	Muta. 2	H341
Reprotoxic	Repr. 1A or 1B	H360
	Repr. 2	H361
	Lact.	H362



Hazardous to the aquatic environment	Aquatic acute 1 Aquatic chronic 1 Aquatic chronic 2	H400 H410 H411
Hazardous to the ozone layer	Ozone	H420
Acute toxicity	Acute Tox. 1 or 2 Acute Tox. 1 or 2 Acute Tox. 1 or 2 Acute Tox. 3 Acute Tox. 3 Acute Tox. 3 Acute Tox. 4 Acute Tox. 4 Acute Tox. 4	H300 H310 H330 H301 H311 H331 H302 H312 H332
Specific target organ toxicity	STOT SE 1 STOT RE 1 STOT RE 2 STOT SE 2	H370 H372 H371 H373
Sensitising (allergenic)	Resp. sens. 1, 1A or 1B Skin sens. 1, 1A or 1B	H334 H317

*The classifications in the table concern all classification variants. For example, H350 also comprises the H350i classification.*

- Safety data sheet for the chemical product in accordance with current European legislation.
- Declaration from the manufacturer of the chemical product used for surface treatment, confirming fulfilment of the requirement.

#### O69 Surface treatment – Ingoing substances, Classification

The ingoing substances<sup>1</sup> used in chemical products for surface treatment must not have any of the classifications listed in the table below.

**Table: List of non-permitted classifications of ingoing substances**

CLP Regulation 1272/2008		
Hazard statement	Hazard class and category	Hazard code
Carcinogenic	Carc. 1A or 1B Carc. 2	H350 H351
Mutagenic	Muta. 1A or 1B Muta. 2	H340 H341
Reprotoxic	Repr. 1A or 1B Repr. 2 Lact.	H360 H361 H362

*The classifications in the table concern all classification variants. For example, H350 also comprises the H350i classification.*

<sup>1</sup> See the definition of ingoing substances in section 1.

- Declaration from the manufacturer/supplier of the chemical product used for surface treatment, confirming fulfilment of the requirement.

#### O70 Surface treatment – Prohibited substances

The requirement covers ingoing substances<sup>1</sup> in chemical products for surface treatment.

**The following substances must not be present<sup>1</sup>:**

- Substances on the EU's Candidate List in accordance with REACH, 1907/2006/EC, article 59, section 10 on the European Chemicals Agency (ECHA) website.



- Substances that are assessed by the EU to be PBT substances (persistent, bioaccumulative and toxic substances) or vPvB substances (very persistent and very bioaccumulative) in accordance with the criteria in Annex XIII of REACH.
- Substances that are considered to be potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects. The list can be found here:  
[http://ec.europa.eu/environment/chemicals/endocrine/pdf/final\\_report\\_2007.pdf](http://ec.europa.eu/environment/chemicals/endocrine/pdf/final_report_2007.pdf)

In addition, the following substances and substance groups must not be present<sup>1</sup>. There may be overlaps between the substances on the following item list and the substances or groups of substances of which the properties are listed above:

- Halogenated organic compounds<sup>2</sup> (e.g. organic chloroparaffins, fluorine compounds, halogenated flame retardants, chlorophenols, etc.). The following are exempted:
  - Bronopol up to 0.05 wt%
  - The blend (3:1) of CMIT/MIT (5-chloro-2-methyl-4-isothiazolin-3-one; 2-methyl-4-isothiazolin-3-one) up to 0.0015 wt%
  - IPBC (iodopropynyl butylcarbamate) up to 0.20 wt%
  - Pigment which complies with EU requirements for dyes in plastic materials in contact with food under Resolution AP (89) point 2.5.
- Isothiazolinones (total) at more than 0.05 wt%
- Bisphenol A, S and F
- Alkylphenols, alkylphenol ethoxylates or other alkylphenol derivatives<sup>3</sup>
- Butyl hydroxytoluene (BHT) and butyl hydroxyanisole (BHA)
- Phthalates<sup>4</sup>
- Pigments and additives based on lead, tin, cadmium, chromium (VI), mercury, antimony, arsenic and their compounds
- Volatile aromatic hydrocarbons (VAH)<sup>5</sup>
- Volatile aromatic compounds (VOC)<sup>6</sup> at more than 80 g/l

<sup>1</sup> See the definition of ingoing substances in section 1.

<sup>2</sup> Be aware of national legislation concerning PFOA if the product is to be sold/marketed in Norway. In Norway, PFOA is governed by the "Regulation on restrictions to the use of health- and environmentally hazardous chemicals and other products (Product Regulations)", Section 2-32.

<sup>3</sup> Alkylphenol derivatives are defined as substances released from alkylphenols on degradation.

<sup>4</sup> Phthalates are esters of 1,2-benzenedicarboxylic acid (orthophthalic acid).

<sup>5</sup> Volatile aromatic hydrocarbons (VAH) are defined as aromatic compounds whose boiling point is max 250°C, measured at a standard pressure of 101.3 kPa.

<sup>6</sup> Volatile organic compounds (VOC) are defined as organic substances with an initial boiling point of max 250°C measured at a standard pressure of 101.3 kPa.

- Declaration from the manufacturer/supplier of the chemical product used for surface treatment, confirming fulfilment of the requirement.

## 10.2 Requirements that apply to solid wood and bamboo constituting more than 10% by weight of the toy

The requirements in this section apply to solid wood and bamboo that constitutes more than 10 wt% of the toy. See the definition of material type in section 1.

### 071 Traceability and certification

#### Species name

The manufacturer/supplier must state the name (species) of the wood/bamboo used.

Manufacturers/suppliers that only use recycled material\* are exempted from this requirement.

#### Chain of Custody certification

Manufacturers/suppliers of the toy or applicant's/producer's supplier of wood/bamboo must have Chain of Custody certification under the FSC/PEFC schemes.

This requirement also applies to manufacturers/suppliers that use recycled material\*.

#### Certified wood/bamboo

At least 70% of the wood/bamboo used in the toy must be certified as originating from sustainable forestry under the FSC or PEFC schemes.

The remaining percentage of wood/bamboo must be covered by the FSC/PEFC compliance schemes (FSC Controlled Wood/PEFC Controlled Sources).

This requirement also applies to recycled material\*.

\* **Recycled material:** *Pre-consumer or post-consumer recycled raw materials, see the definition in the ISO 14021 standard. See the definitions in section 1 for more details.*

*Nordic Ecolabelling includes by-products from primary wood processing industries (sawdust, wood chips, shavings, bark etc.) or residues from forestry operations (bark, branches, roots, etc) in its definition of recycled material.*

- Name (species name) of the wood/bamboo used.
- A valid FSC/PEFC Chain of Custody certificate from the applicant/manufacturer/supplier that covers all the wood/bamboo.
- If the toy manufacturer is Chain of Custody certified: A manufacturer that has FSC/PEFC Chain of Certification must submit documentation showing compliance with the requirement for the percentage of certified material through the applicant/manufacturer's Chain of Custody account.
- If a supplier holds Chain of Custody certification, the toy manufacturer must show that it purchases certified wood/bamboo. This is to be verified via invoices stating the proportion of certified material purchased.
- Declaration of compliance with the requirement for the percentage of certified material or recycled material through the manufacturer/supplier's Chain of Custody account.

## 11 Wood-based panels

The requirements in this section cover wood-based panels such as chipboard, fibreboard (incl. MDF and HDF), OSB (Oriented Strand Board), laminates (plywood and LVL) and solid wood panels (equivalent to non-load bearing glulam panels or hobby panels). The requirements also cover equivalent bamboo products.

Nordic Swan Ecolabelled Construction panels with a valid licence automatically fulfil all requirements here in section 11, with the exception of requirements O72 and O73.

## 11.1 Requirements that apply irrespective of amount in product

The requirements in this section concern all product elements\* made of wood-based panels.

\* *See the definition of material element in section 1.*

### O72 Third-party control of test from EN 71 in EU Toy Safety Directive

The following tests for the wood-based panels used must be submitted for toys or elements of toys:

EN 71-3: Toys – Safety requirements – Part 3: Migration of certain elements

The requirement applies only to the types of toys covered by the standards above.

If the wood and bamboo elements have had a surface treatment applied (e.g. paint, varnish), that surface treatment must also be tested.

- Test report in relation to EN 71-9 for the wood-based panels used, showing fulfilment of the requirement. Plus declaration from the test laboratory confirming conformity with the requirements in EN 71-3 for the types of toys for which the application is being made. The analysis laboratory must meet the requirements in Appendix 2.

### O73 Surface treatment

Surface treatment of wood-based panels must comply with requirements O68, O69 and O70.

Lamination is not considered a surface treatment in this context and therefore is exempted from this requirement. Instead it must meet the chemical requirements that apply to the production of wood-based panels (requirements O75, O76 and O77).

### O74 Prohibited tree species

Species of trees on the Nordic Ecolabel list of protected tree species ([www.nordic-ecolabel.org/wood/](http://www.nordic-ecolabel.org/wood/)) must not be used.

- Declaration from the applicant/manufacturer/supplier that the requirement is fulfilled.

## 11.2 Requirements that apply to wood-based panel elements constituting over 5% by weight of the toy

The requirements in this section apply to wood-based panel elements that constitute more than 5 wt% of the toy. See the definition of material element in section 1.

### O75 Chemical products – Classification

Chemical products used in the production of wood-based panels must not have any of the classifications listed in the table below.

**Table: List of non-permitted classifications of chemical products**

CLP Regulation 1272/2008		
Hazard statement	Hazard class and category	Hazard code
Carcinogenic	Carc. 1A or 1B Carc. 2	H350 H351
Mutagenic	Muta. 1A or 1B Muta. 2	H340 H341
Reprotoxic	Repr. 1A or 1B Repr. 2 Lact.	H360 H361 H362
Hazardous to the aquatic environment	Aquatic acute 1 Aquatic chronic 1 Aquatic chronic 2	H400 H410 H411
Hazardous to the ozone layer	Ozone	H420
Acute toxicity	Acute Tox. 1 or 2 Acute Tox. 1 or 2 Acute Tox. 1 or 2 Acute Tox. 3 Acute Tox. 3 Acute Tox. 3 Acute Tox. 4 Acute Tox. 4 Acute Tox. 4	H300 H310 H330 H301 H311 H331 H302 H312 H332
Specific target organ toxicity	STOT SE 1 STOT RE 1 STOT RE 2 STOT SE 2	H370 H372 H371 H373
Sensitising (allergenic)	Resp. sens. 1, 1A or 1B Skin sens. 1, 1A or 1B	H334 H317

*The classifications in the table concern all classification variants. For example, H350 also comprises the H350i classification.*

- Safety data sheet for the chemical product in accordance with current European legislation.
- Declaration from the manufacturer/supplier of the chemical product used in the production of wood-based panels, confirming fulfilment of the requirement.

## 076 Ingoing substances, Classification

The ingoing substances<sup>1</sup> used in the production of wood-based panels must not have any of the classifications listed in the table below.

<sup>1</sup> See the definition of ingoing substances in section 1.

**Table: List of non-permitted classifications of ingoing substances**

CLP Regulation 1272/2008		
Hazard statement	Hazard class and category	Hazard code
Carcinogenic	Carc. 1A or 1B Carc. 2	H350 H351
Mutagenic	Muta. 1A or 1B Muta. 2	H340 H341
Reprotoxic	Repr. 1A or 1B Repr. 2 Lact.	H360 H361 H362

*The classifications in the table concern all classification variants. For example, H350 also comprises the H350i classification.*

- Declaration from the manufacturer/supplier of the chemical product used in the production of wood-based panels, confirming fulfilment of the requirement.

## 077 Prohibited substances

### **The following substances must not be present<sup>1</sup> the chemical product used in the production of wood-based panels:**

- Substances on the EU's Candidate List in accordance with REACH, 1907/2006/EC, article 59, section 10 on the European Chemicals Agency (ECHA) website.
- Substances that are assessed by the EU to be PBT substances (persistent, bioaccumulative and toxic substances) or vPvB substances (very persistent and very bioaccumulative) in accordance with the criteria in Annex XIII of REACH.
- Substances that are considered to be potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects. The list can be found here:  
[http://ec.europa.eu/environment/chemicals/endocrine/pdf/final\\_report\\_2007.pdf](http://ec.europa.eu/environment/chemicals/endocrine/pdf/final_report_2007.pdf)

In addition, the following substances and substance groups must not be present<sup>1</sup>. There may be overlaps between the substances on the following item list and the substances or groups of substances of which the properties are listed above:

- Halogenated organic compounds<sup>2</sup> (e.g. organic chloroparaffins, fluorine compounds, halogenated flame retardants, chlorophenols, etc.). The following are exempted:
  - Bronopol up to 0.05 wt%
  - The blend (3:1) of CMIT/MIT (5-chloro-2-methyl-4-isothiazolin-3-one; 2-methyl-4-isothiazolin-3-one) up to 0.0015 wt%
  - IPBC (iodopropynyl butylcarbamate) up to 0.20 wt%
  - Pigment which complies with EU requirements for dyes in plastic materials in contact with food under Resolution AP (89) point 2.5.
- Isothiazolinones (total) at more than 0.05 wt%
- Bisphenol A, S and F
- Alkylphenols, alkylphenol ethoxylates or other alkylphenol derivatives<sup>3</sup>
- Butyl hydroxytoluene (BHT) and butyl hydroxyanisole (BHA)
- Phthalates<sup>4</sup>
- Pigments and additives based on lead, tin, cadmium, chromium (VI), mercury, antimony, arsenic and their compounds
- Volatile aromatic hydrocarbons (VAH)<sup>5</sup>
- For glue: Volatile aromatic compounds (VOC) at more than 3 wt%<sup>6</sup> in the glue

<sup>1</sup> See the definition of ingoing substances in section 1.

<sup>2</sup> Be aware of national legislation concerning PFOA if the product is to be sold/marketed in Norway. In Norway, PFOA is governed by the "Regulation on restrictions to the use of health- and environmentally hazardous chemicals and other products (Product Regulations)", Section 2-32.

<sup>3</sup> Alkylphenol derivatives are defined as substances released from alkylphenols on degradation.

<sup>4</sup> Phthalates are esters of 1,2-benzenedicarboxylic acid (orthophthalic acid).

<sup>5</sup> Volatile aromatic hydrocarbons (VAH) are defined as aromatic compounds whose boiling point is max 250°C, measured at a standard pressure of 101.3 kPa.

<sup>6</sup> Volatile organic compounds (VOC) are defined as organic substances with an initial boiling point of max 250°C measured at a standard pressure of 101.3 kPa.

- Declaration from the manufacturer/supplier of the chemical product used in the production of wood-based panels, confirming fulfilment of the requirement.

## O78 Formaldehyde

Wood-based panels that contain formaldehyde-based adhesive must meet one of the following requirements a) or b):

- a) According to the test method of the ISO 12460-5 standard, the content of free formaldehyde must not exceed an average of 5 mg formaldehyde/100 g dry product for MDF and HDF panels and 4 mg/100 g dry product for all other types of panels.  
 The requirement applies to wood-based panels with a moisture content of H = 6.5%. If the moisture content of the panels is between 3% and 10%, the test results must be multiplied by F factor, calculated using the following formulas:  
 - For chipboard:  $F = -0.133 H + 1.86$   
 - For MDF and HDF:  $F = -0.121 H + 1.78$
- b) According to the test method of the ISO 717-1 standard, emissions of formaldehyde must not exceed an average of 0.09 mg/m<sup>3</sup> air for MDF and HDF panels and 0.07 mg/m<sup>3</sup> air for other types of panels.

Option b) in the requirement can also be documented using the ASTM E 1333 and JIS A 1460 test methods. The correlation between the threshold limit values that must be met in accordance with the test method of the EN 717-1 standard and the other test methods is:

Type of panel	EN 717-1 (23°C/45% RH)	ASTM E 1333 (25°C/50% RH)	ASTM E 1333 (25°C/50% RH)	JIS A 1460
MDF and HDF	0.09 mg/m <sup>3</sup>	0.06 ppm	0.07 mg/m <sup>3</sup>	0.66 mg/L
Other panels	0.07 mg/m <sup>3</sup>	0.08 ppm	0.10 mg/m <sup>3</sup>	0.53 mg/L

- Analysis report, including measurement methods, measurement results and measurement frequency. It must be clearly stated which method/standard was used, the laboratory that conducted the analysis, and that the analysis laboratory is an independent third party. Other analysis methods than those stated in the requirement may be used, provided that the correlation between test methods can be verified by an independent third party. The analysis laboratory must meet the requirements in Appendix 2.

## 11.3 Requirements that apply to wood-based panels constituting more than 10% by weight of the toy

The requirements in this section apply to wood-based panels that constitute more than 10 wt% of the toy. See the definition of material type in section 1.

### O79 Traceability and certification of wood raw material in wood-based panels

#### Species name

The manufacturer/supplier must state the name (species) of the wood/bamboo used.

Manufacturers/suppliers that only use recycled material\* are exempted from this requirement.

## Chain of Custody certification

Manufacturers/suppliers of the toy or applicant's/producer's supplier of wood/bamboo must have Chain of Custody certification under the FSC/PEFC schemes.

This requirement also applies to manufacturers/suppliers that use recycled material\*.

### Certified wood/bamboo

At least 70% of the wood/bamboo used in the toy must be certified as originating from sustainable forestry under the FSC or PEFC schemes.

The remaining percentage of wood/bamboo must be covered by the FSC/PEFC compliance schemes (FSC Controlled Wood/PEFC Controlled Sources).

This requirement also applies to recycled material\*.

\* **Recycled material:** *Pre-consumer or post-consumer recycled raw materials, see the definition in the ISO 14021 standard. See the definitions in section 1 for more details.*

*Nordic Ecolabelling includes by-products from primary wood processing industries (sawdust, wood chips, shavings, bark etc.) or residues from forestry operations (bark, branches, roots, etc) in its definition of recycled material.*

- Name (species name) of the wood/bamboo used.
- A valid FSC/PEFC Chain of Custody certificate from the applicant/manufacturer/supplier that covers all the wood/bamboo.
- If the toy manufacturer is Chain of Custody certified: A manufacturer that has FSC/PEFC Chain of Certification must submit documentation showing compliance with the requirement for the percentage of certified material through the applicant/manufacturer's Chain of Custody account.
- If a supplier holds Chain of Custody certification, the toy manufacturer must show that it purchases certified wood/bamboo. This is to be verified via invoices stating the proportion of certified material purchased.
- Declaration of compliance with the requirement for the percentage of certified material or recycled material through the manufacturer/supplier's Chain of Custody account.

## 12 Spare parts

Some types of toys can have their service life extended by offering spare parts. This in turn reduces the consumption of resources and thus also the environmental impact.

### O80 Spare parts

This requirement applies to:

- Toys sold to institutions (e.g. schools and nurseries), comprising individual parts (e.g. pieces for board games and jigsaw puzzles\*, components, or the like) that are necessary for the function or the original play concept.
- Toys designed to carry a child's weight and that have moving parts (e.g. toy bikes and toy kick scooters). Applies to toys sold to institutions or private consumers.

Spare parts are to be offered for a minimum of four years after the date of the toy's purchase\*\*.

Spare parts must include parts that are essential to the toy's function or original play concept (e.g. pedals, bearings, wheels, play pieces).



The option to purchase spare parts is to be clearly communicated to customers, for example on the website, in marketing material and so on. Ordering spare parts must also be user-friendly and simple for the customer.

*\* Applies in cases where each part is produced separately. For example, this requirement does not apply to jigsaw pieces that make up a single picture, where all the pieces are simultaneously stamped out from that image. However, the requirement does apply to jigsaw pieces for young children, where each piece carries an individual picture.*

*\*\* The purchase date is interpreted as occurring two years after the production date, so that if spare parts are offered for a minimum of four years after the purchase date, the spare parts will have to be available for at least six years after the production date.*

- Declaration from the applicant that spare parts are offered for a minimum of four years after the date of the toy's purchase. Plus, a description of which spare parts are offered.
- Documentation showing how the option of purchasing spare parts is communicated to the customer and that the ordering procedure is user-friendly.

## 13 Packaging, storage, and transport

Packaging and recycling are key focus areas in today's society. Nordic Ecolabelling sets strict requirements concerning packaging in order to optimise the potential for recycling.

The requirements below relate to primary packaging.

### O81 Packaging – Volume in relation to toy

The volume of the toy must be at least 65% of the total volume of the packaging.

- Calculation showing fulfilled of the requirement. The calculation should contain information about the total volume of the packaging and the volume of the toy.

### O82 Packaging – Ban on certain plastic types

PVC, PVDC, oxo-degradable plastic and biodegradable plastic must not be used in the packaging.

- Declaration from the packaging manufacturer that the requirement is fulfilled.

### O83 Packaging – Recyclability and recycled material

This requirement applies to primary packaging\*.

#### **Recyclability:**

It must be possible to recycle the main material\*\* in the packaging via the existing waste systems operating in the Nordic region today.

Incineration with energy recovery does not count as material recycling.

#### **Plastic packaging:**

Coloured plastic cannot be used. Colouring is permitted only if at least 50% by weight of the plastic is recycled material\*\*\*.

#### **Paper and cardboard-based packaging:**

Paper and cardboard-based packaging must in total contain 100% FSC or PFC certified fibre raw material and/or post-consumer/post-commercial recycled material\*\*\*.



*\* Primary packaging is defined here as packaging from the manufacturer that accompanies the product all the way to the consumer. Delivery packaging used by online retailers is not considered to be primary packaging.*

*\*\* The main material is defined as the material that makes up 90 wt% or more of the total primary packaging.*

*\*\*\* Recycled plastic material is defined as post-consumer / commercial recycled material as defined in ISO 14021:2016:*

*“Post-consumer” is defined as material generated by households or commercial, industrial, or institutional facilities in their role as end-users of a product that can no longer be used for its intended purpose. This includes materials from the distribution chain.*

- Description of packaging stating material types, which materials if any are recycled and the wt% of each.
- For plastic: Documentation showing that the plastic is not coloured, or documentation that the plastic is recycled.
- For paper and cardboard: Valid FSC/PEFC Chain of Custody certificate and/or documentation that the paper/cardboard is recycled.

#### O84 Packaging – Design for recycling

If the packaging comprises multiple material types, it must be easy to separate these (e.g. plastic and paper board).

If labels are used on plastic packaging, the labels must cover no more than 30% of the plastic surface or the labels must be made of the same type of plastic as the packaging to which they are attached.

- Description of the packaging and labels documenting compliance with the requirement.

#### O85 Information on sorting for recycling

The requirement applies if the packaging comprises multiple types of material.

The packaging must carry information on how the material types can be separated and how they must be sorted for recycling. This information may be stated using text or symbols.

- Product label or artwork providing information on separation and sorting for recycling.

#### O86 Transport and storage – Chlorophenols, DMF, PCB and organotin compounds

Chlorophenols (and their salts and esters), dimethyl fumarate (DMF), PCB and organotin compounds must not be used in connection with the transport or storage of the toy and its semi-manufactures.

- Declaration from the suppliers at every stage of the production chain, confirming that these substances or compounds are not used during the transport or storage of the toy and its semi-manufactures.

## 14 Social and ethical requirements

#### O87 Fundamental principles and rights at work

The licensee must ensure that the production sites \* used in the production of the toy comply with:

- Relevant national laws and regulations
- The International Labour Organisation (ILO) Conventions below:

ILO Conventions:

1. Prohibition of forced labour (ILO Conventions Nos. 29 and 105)
2. Freedom of association, and protection of the right to organize and to conduct collective bargaining (ILO Conventions Nos. 87, 98, 135 and 154)
3. Prohibition of child labour (ILO Conventions Nos. 138, 182 and 79 plus ILO Recommendation No. 146)
4. No discrimination (ILO Conventions Nos. 100 and 111, UN Convention on the Elimination of All Forms of Discrimination against Women)
5. No violent treatment – Physical abuse or punishment, and threats of physical abuse are prohibited. The same applies to sexual or other forms of harassment.
6. Workplace health and safety (ILO Convention No. 155 and ILO Recommendation No. 164)
7. Fair pay (ILO Convention No. 131)
8. Working hours (ILO Conventions Nos.1 and 14)

\* *In this requirement, “production sites” covers the following:*

- *production sites that assemble the toy into the finished product.*
- *production sites that make semi-manufactures. A semi-manufacture is defined here as a collection of elements for the finished toy.*

The licensee must have written procedures in place to ensure compliance with the above conditions at production sites.

In addition, the licensee must submit either a valid SA8000 certificate or third-party verification of compliance with the requirement, e.g. a BSCI audit report, ICTI Ethical Toy Program certificate or other third-party verification that the production sites meet the requirement.

If the manufacturer is in the process of becoming SA8000 certified, this may be accepted under the following conditions: The last report from the certification body, incl. action plan with specified deadlines, is submitted for assessment. Nordic Ecolabelling may withdraw the Nordic Swan Ecolabel licence, if the licensee no longer fulfils SA8000 or does not meet the stated deadlines in any action plans.

- Written procedures from the licensee, aimed at ensuring that the production sites used meet the requirement.
- The applicant must submit a description of the Code of Conduct for its suppliers.
- SA8000 certificate or third-party verification of compliance with the requirement, e.g. BSCI audit report or ICTI Ethical Toy Program certificate.

## 15 Quality and regulatory requirements

Quality and regulatory requirements are general requirements that are always included in Nordic Ecolabelling’s product criteria. The purpose of these is to ensure that fundamental quality assurance and applicable environmental requirements from the authorities are dealt with appropriately. They also ensure compliance with Nordic Ecolabelling’s requirements for the product throughout the period of validity of the licence.

These requirements have been extended in this generation of criteria with new requirements "Annual controls and assessments of suppliers".

To ensure that the Nordic Ecolabelling's requirements are met, the following routines must be implemented.

### O88 Annual controls and assessments of suppliers

The licensee shall establish and use guidelines for annual controls and assessments of external suppliers.

In this requirement, external suppliers are:

- a) suppliers who assemble the toy into the finished product.
- b) suppliers who make semi-manufactures. A semi-manufacture is defined here as a textile fabric or a collection of elements for the finished toy.
- c) suppliers that perform surface treatments (regardless of on which type of material).

These guidelines must contain the following, as a minimum:

- There must be an annual check that the supplier's responsible person is familiar with Nordic Ecolabelling's requirements and understands how the supplier can ensure compliance with these.
- There is to be an annual check that procedures have been implemented to ensure that changes are only made to the production of the Nordic Swan Ecolabelled toy (e.g. changes to raw materials) once the licensee has obtained approval from Nordic Ecolabelling.
- If any of the requirements in the criteria are documented via certification schemes (e.g. Oeko-Tex 100, GOTS, Global Recycled Standard certificate, FSC, EU Ecolabel or similar), checks are to be carried out to ensure that certificates are up to date and remain valid.
- There must also be a description of procedures and consequences that come into force if assessments of suppliers reveal a lack of conformity with the above.

- The applicant shall submit a description of the guidelines for annual controls and assessments of external suppliers.
- Each year, the licensee shall provide Nordic Ecolabelling with documentation of the annual controls and assessments of external suppliers, e.g. in the form of annually updated supplier assessment lists that include details of the responsible persons and the requirement areas assessed. Documentation for every year that the licence remains valid must be archived by the licensee.

### O89 Responsible person and organization

The company (both the holder of the production license and the holder of the brand owner license) shall appoint individuals who are responsible for ensuring the fulfilment of the Nordic Ecolabelling requirements, for marketing and for finance, as well as a contact person for communications with Nordic Ecolabelling.

- Organizational chart showing who is responsible for the above.

### O90 Documentation

The licensee shall archive the documentation that is sent in with the application, or in a similar way maintain information in the Nordic Ecolabelling data system.

- ☞ Checked on site, as necessary.

### O91 Quality of the toy

The licensee shall guarantee that the quality of the Nordic Swan Ecolabelled product does not deteriorate during the validity period of the licence.

- Procedures for archiving claims and, where necessary, dealing with claims and complaints regarding the quality of the Nordic Swan Ecolabelled product.
- The claims archive is checked on site.

## 092 Planned changes

Written notice must be given to Nordic Ecolabelling of planned changes in products and markets, that have a bearing on Nordic Ecolabelling requirements.

- Procedures, of both the holder of the production license and the holder of the brand owner license, detailing how planned changes in products and markets are handled.

## 093 Unplanned nonconformities

Unplanned nonconformities that have a bearing on Nordic Ecolabelling requirements must be reported to Nordic Ecolabelling in writing and journalled.

- Procedures detailing how unplanned nonconformities are handled.

## 094 Traceability

The licensee must be able to trace the Nordic Swan Ecolabelled product in the production. A manufactured / sold product should be able to trace back to the occasion (time and date) and the location (specific factory) and, in relevant cases, also which machine / production line where it was produced. In addition, it should be possible to connect the product with the actual raw material used.

- Description of/procedures for the fulfilment of the requirement.

## 095 Legislation and regulations

The licensee shall ensure compliance with all applicable local laws and provisions at all production facilities for the Nordic Swan Ecolabelled product, e.g. with regard to safety, working environment, environmental legislation and site-specific terms/permits.

- Duly signed application form.

# Regulations for the Nordic Ecolabelling of products

When the Nordic Swan Ecolabel is used on products the licence number shall be included.

More information on graphical guidelines, regulations and fees can be found at [www.nordic-ecolabel.org/regulations/](http://www.nordic-ecolabel.org/regulations/)

## Follow-up inspections

Nordic Ecolabelling may decide to check whether the toy fulfils Nordic Ecolabelling requirements during the licence period. This may involve a site visit, random sampling or similar test.

The licence may be revoked if it is evident that the toy does not meet the requirements. Random samples may also be taken in-store and analysed by an independent laboratory. If the requirements are not met, Nordic Ecolabelling may charge the analysis costs to the licensee.

## Appendix 1 List of products not covered by the EU Toy Safety Directive (2009/48/EC)

The following list corresponds to Annex I of the EU Toy Safety Directive (2009/48/EC):

- Decorative objects for festivities and celebrations
- Detailed scale models for adult collectors
- Folk dolls and decorative dolls and other similar articles for adult collectors
- Faithful reproductions of real firearms
- Historically faithful replicas of toys
- Sports equipment, including roller skates, inline skates, and skateboards
- Bicycles with a maximum saddle height of more than 435 mm
- Scooters and other means of transport designed for sport or for use on public roads
- Electrically driven vehicles for use on public roads
- Water sports equipment and swimming aids
- Puzzles with more than 500 pieces
- Guns and pistols using compressed gas
- Fireworks, including percussion caps
- Darts games (darts with metallic points)
- Electric ovens, irons or other functional products operated at a nominal voltage exceeding 24 volts
- Products intended for use for educational purposes in schools under the surveillance of an adult instructor, such as science equipment
- Electronic equipment, such as personal computers and game consoles
- Interactive software, intended for leisure and entertainment
- Babies' soothers
- Light fittings that appeal to children (e.g. night lights)
- Electrical transformers for toys
- Fashion accessories for children which are not for use in play

## Appendix 2 Testmethods and analysis laboratory

### **Requirements on the analysis laboratory**

The analytical laboratory / sampling institute must be competent and impartial.

If accreditation is not required separately, the sampling and/or analysis laboratory must meet the general requirements of ISO 17025 standard for quality control of sample and calibration laboratories or be an official GLP-approved analysis laboratory.

The applicant's analysis laboratory may be approved for analysis and testing if:

- sampling and analysis is monitored by the authorities, or
- the manufacturer's quality assurance system covers analyses and sampling and is certified to ISO 9001 or ISO 9002, or
- the manufacturer can demonstrate agreement between a first-time test conducted at the manufacturer's own laboratory and testing carried out in parallel at an independent test institute, and the manufacturer takes samples in accordance with a fixed sampling schedule.

## Appendix 3 Information on the toy, material overview and composition

The following shall be stated for each toy:

Toy							
Trade name and any item no.:							
Product type: (soft toy, rattle, etc.)							
For age group:							
Sold to institutions or private:							
Sold in (physical/online store, etc.):							
Total weight (g):							
Composition							
Toy-part <i>(state which part of the toy)</i>	Materials <i>(state whether recycled***)</i>	Supplier	Weight of material (g)	WT-% of material type*	VT-% of material element**	Function and location	Can children come into contact with the material during normal use****?

\* *Definition of Material type:*

*In these criteria, material type may be “cotton”, “wood”, “steel”, etc. but could also be “metal”, for example.*

*“Material type” differs from “material element” in that suppliers, supply chains and production processes are not relevant for “material type”. Here, only the type of material is relevant. Material types could e.g. be “plastic” or “metal” but could also be more specific materials within these categories, such as “bio-based plastic”, “steel” and so on.*

*The criteria may therefore contain requirements for both material elements and material types, often with regard to when various requirements apply.*

**\*\* Definition of Material elements:**

*In these criteria, material elements may be “metal elements”, “plastic elements”, “wooden elements” and so on, plus “product elements” that might comprise multiple materials as described in the relevant section.*

*Material element is the designation of a unique material element in the final toys. Different material elements have various different supply chains or are produced differently but may be of the same material type. For example, textiles that are only distinguished by dyeing or printing by the same supplier are considered to be the same textile element. For example, polyester from supplier 1 is one textile element, and polyester from supplier 2 will thus be another textile element. Two different types of polyester from the same supplier will also be separate textile elements.*

**\*\*\* Recycled material is defined in the requirement according to ISO 14021, which uses the following two categories:**

*“Pre-consumer/commercial” is defined as material that is reclaimed from the waste stream during a manufacturing process. Materials that are reworked or reground, or waste that has been produced in a process, and can be recycled within the same manufacturing process that generated it, are not considered to be pre-consumer recovered material.*

*Nordic Ecolabelling considers reworked, reground or scrap material that cannot be recycled directly in the same process, but requires reprocessing (e.g. in the form of sorting, remelting and granulating) before it can be recycled, to be pre-consumer/commercial material. This is irrespective of whether the processing is done in-house or externally.*

*“Post-consumer/commercial” recycled material is defined by ISO 14021 as follows: “Post-consumer/commercial” is defined as material generated by households or commercial, industrial or institutional facilities in their role as end-users of a product that can no longer be used for its intended purpose. This includes materials from the distribution chain.*

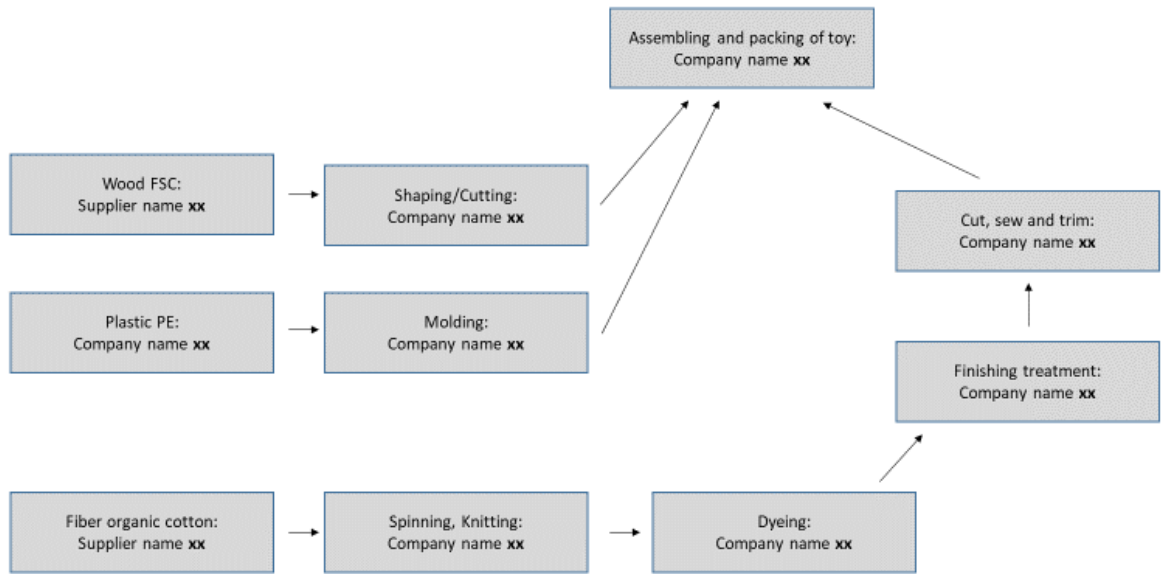
**\*\*\*\* “Material element/type with which the child is in contact” means an element that the child might come into contact with during normal or expected use of the toy.**

*Example of elements with which a child cannot come into contact: encapsulated elements or elements that are covered, so that it is impossible for the child to come into contact with them. All other elements that the child is able to touch are defined as elements with which the child is in contact.*



## Appendix 4 Manufacturing process for the toy: Processes and suppliers

Example of flow chart:



Suppliers:

Company name	Production site (full address)	Contact person (name, e-mail and tel.)	Production process (e.g. dyeing, galvanising, etc.)

## Appendix 5 Carcinogenic aromatic amines

<b>Carcinogenic aromatic amines</b>	<b>CAS-no</b>
4-aminodiphenyl	92-67-1
Benzidine	92-87-5
4-chlor-o-toluidine	95-69-2
2-naphthylamine	91-59-8
o-amino-azotoluene	97-56-3
2-amino-4-nitrotoluene	99-55-8
p-chloraniline	106-47-8
2,4-diaminoanisol	615-05-4
4,4'-diaminodiphenylmethane	101-77-9
3,3'-dichlorbenzidine	91-94-1
3,3'-dimethoxybenzidine	119-90-4
3,3'-dimethylbenzidine	119-93-7
3,3'-dimethyl-4,4'-diaminodiphenylmethane	838-88-0
p-cresidine	120-71-8
4,4'-oxydianiline	101-80-4
4,4'-thiodianiline	139-65-1
o-toluidine	95-53-4
2,4-diaminotoluene	95-80-7
2,4,5-trimethylaniline	137-17-7
4-aminoazobenzene	60-09-3
o-anisidine	90-04-0
2,4-Xylidine	95-68-1
2,6-Xylidine	87-62-7
4,4'-methylene-bis-(2-chloro-aniline)	101-14-4
2-amino-5-nitroanisole	97-52-9
m-nitroaniline	99-09-2
2-amino-4-nitrophenol	99-57-0
m-phenylenediamine	108-45-2
2-amino-5-nitrothiazole	121-66-4
2-amino-5-nitrophenol	121-88-0
p-aminophenol	123-30-80
p-phenetidine	156-43-4
2-methyl-pphenylenediamine; 2,5diaminotoluene	615-50-9
2-methyl-pphenylenediamine; 2,5diaminotoluene	95-70-5
2-methyl-pphenylenediamine; 2,5diaminotoluene	25376-45-8
6-chloro-2,4-dinitroaniline	3531-19-9