

1.10 Guidance

The issue of secondary materials

In order to reduce resource use and close material loops it is not only necessary to recycle waste (products), but also to use these secondary raw materials in subsequent products. This guidance points out some issues that are relevant if you intend to use secondary materials for your toy production.

In toys manufacturing, several types of recycled materials may be used, such as recycled plastics, paper cardboard, or textiles.

Examples of advantages of recycled plastics (and other material types) are as follows:

- Resources are saved by avoiding the use of primary raw materials (e.g. mineral oil)
- Secondary materials are usually cheaper than virgin materials

The drawback of recycled plastics (and other material types) is amongst others:

- The chemical composition is largely unknown, i.e. it is frequently not clear if and which chemicals of concern are contained in them
- The technical quality of the material may be lower than that of virgin materials and it may vary over time.

Safety first

Any exposure of children to chemicals of concern [#Section 1.1 Guidance understanding](#) should be avoided as much as possible [#1.5 Guidance why children](#). Therefore, it is important to ensure that any recycled materials used in toy production do not contain any chemicals of concern. There are two ways to check if the presence of CoCs in secondary materials is likely.

1. Sources of secondary materials

If the secondary material is produced only from products that are regulated regarding CoCs, e.g. food packaging materials, then the recycled materials are likely to be free from CoCs, too. Hence, you could check what input materials the supplier / recycling installation is using.

This option is based on trust and the assumption that the recycling installation knows the input materials sufficiently well.

2. Chemical analyses

It is possible to either ask the supplier of recycled materials for analytical results about the content of CoCs in materials or to make respective analyses yourself. However, one cannot analyse a material for “everything”. Therefore, analyses should be well planned and targeted. (See [#3.3 Guidance Laboratory testing for more information](#)).

If you don't know what's in it – don't use it!

Despite the wish to increase the use of recycled materials – don't use secondary materials if you don't know if there might be CoCs contained in them. Do not risk being non-compliant, losing trust in your brand and customers or harming children's health.