

## 2.4 Guidance

### Staying up to date with legislation

This document is part of the *International Chemicals Management Toolkit for the Toy Supply Chain* developed by the United Nations Environment Programme (UNEP) in collaboration with the Baltic Environmental Forum (BEF) within the framework of the Global Environment Facility (GEF) project ID: 9771 on Global Best Practices on Emerging Chemical Policy Issues of Concern under the Strategic Approach to International Chemicals Management (SAICM).

Chemical legislation is subject to continuous change, as new scientific evidence on hazardous properties and/or risks from chemicals emerge. Therefore, even if your assessment revealed that the chemicals in your product are currently not [identified as CoCs](#), or they are but are contained below concentration limits defined in legislation, this may change in the future. Incompliance with (new) legislation, might result in product recalls and sanctions, as well as a loss of good reputation. Therefore, it is crucial to implement a routine to stay up to date with legislation.

#### Main steps for keeping up to date:

- 1) **Create an overview table** (c.f. Table 1 below) listing the countries a toy is marketed in and the relevant regulations and standards. It is recommended to consider including additional information on when you last checked the regulation, or which authority oversees the legislation.
- 2) **Identify responsible staff and decide on a process within the company** to review legislation regularly.
- 3) **Review the relevant legislation** on a regular basis, but at least once every year. **Changes may concern:**
  - a. The restriction of new chemicals: Search in the [chemicals inventory](#) if it is contained in the input materials of your products.
  - b. The restriction of a group of chemicals which has a particular property, e.g. CMRs: Search in the [chemicals inventory](#) if chemicals with these properties are contained in the input materials of your products.
  - c. The institution, who holds the responsibility for the law or standard; this may lead to changes in the links to legislation and related guidance; note it in the overview table for checking it the next time
  - d. A recast of legislation or a review, which may change several provisions. To check how this affects you, use the '[Guidance: How to find legislation](#)'.
- 4) **Stay informed:** Many organisations, such as industry and trade associations, regulatory authorities or consulting companies in the field of product compliance offer free email newsletters that inform on regulatory developments. Subscribing to such newsletters can help you become aware of potential changes early on.

Table 1: Overview table (not complete, only exemplary!)

Country of export	EU ( <i>example</i> )	Country of export 1	...
National legislation	Toy safety Directive Standards EN 71		
Link(s)	<a href="#">Toy safety Directive</a> <a href="#">Standards</a> (CEN/TC 52)		
Bans	Annex II Section III  chemicals classified as carcinogenic, mutagenic or reprotoxic according to the <a href="#">REGULATION (EC) No 1272/2008</a> on classification, labelling and packaging of substances and mixtures exemptions exist <ul style="list-style-type: none"> <li>● List of allergenic chemicals</li> <li>● ...</li> </ul>		
Restrictions	Annex II Section III <ul style="list-style-type: none"> <li>● Limit values for banned chemicals that are acceptable</li> <li>●</li> </ul>		
Migration limits	Annex II Section III <ul style="list-style-type: none"> <li>● List of heavy metals with specific migration limits</li> </ul>		
Labelling requirements	Annex II Section III <ul style="list-style-type: none"> <li>● List of allergenic fragrances</li> </ul>		
Certification requirements	No		
Testing requirements	No		
Comments	Under revision		
Responsible institution	<a href="#">Directorate General Grow</a>		

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<b>Next check</b>	01.12.2022		