

To: DSC

Sent: 03 September 2025 16:26

Subject: Re: DSC 168/25 COM 2023-462 Letter from AAC to British Toy & Hobby Association

Hi [REDACTED],

I spoke to a colleague yesterday on this – apologies we didn't follow up on the formal survey over the summer period.

I'm sending across some high-level comments from the British Toy & Hobby Association (BTHA) on the replacement regulation. We would be happy to stay in contact and once the regulation has been finalised and there has been some time to analyse, we will be able to share further thoughts on the technical detail. This is something we will also be feeding into the UK government.

In the meantime, our comments:

- The new Regulation will go further on product safety than the existing Toy Safety Directive which is already the strictest toy legislation in the world.
- Until BTHA see the final translations, it is still too early for us to comment on the specific technical details of the regulation and the impact new requirements and standards may have on individual toy product lines that are currently available on the market.
- The new requirements will require a different approach by toy companies, e.g. more stringent substance restrictions, the adoption of a new Digital Product Passport, and more, which are going to require significant time and investment to implement. The concluding transition time of 54 months is more workable than some of the shorter proposals within the Regulation.
- Majority of British toy manufacturers and distributors sell into both the UK and EU markets so will be required and already looking to apply the new EU Toy Safety Regulations for existing and future product lines.
- Our current understanding is that the Digital Product Passport will be linked to a QR code on the toy packaging. It is critical that the whole of the UK adopt a system which can use the same QR code for compliance to avoid the difficulty that industry experienced with the UKCA and NI markings where toy companies were at risk of needing separate labelling and stock.
- Reputable toy makers have always put safety first. Stricter safety rules make little difference if unscrupulous sellers can continue to ignore them without consequence. [BTHA research](#) has shown that the major source of unsafe toys is from third-party sellers through major online marketplaces as the online marketplace is not legally responsible for the safety of the toys. This is not

addressed in the updated Regulation but something we are engaging with the UK government now there are powers under the Product Regulation and Metrology Act.

- BTHA support better and well-funded enforcement across the UK and EU to protect consumers and responsible businesses from those companies who have no intention of meeting the same standards. These new requirements need to be backed up with sufficient enforcement of the rules.

Many thanks,

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Head of Public Affairs

BRITISH
**toy &
hobby**
ASSOCIATION



Assistant Assembly Clerk
Windsor Framework Democratic Scrutiny
Committee (DSC)

Ref: DSC 168/25

13 June 2025

British Toy & Hobby Association

Issued via email to:

To whom it may concern,

**COM/2023/462 Proposal for a Regulation on the safety of toys and
repealing Directive 2009/48/EC**

At its meeting on 1 May 2025, the Windsor Framework Democratic Scrutiny Committee (DSC) agreed to seek views from stakeholders on the above proposed replacement EU act once the draft text, which was provisionally agreed by the European Parliament and Council of the EU on 10 April 2025, became publicly available.

The provisionally agreed text of the proposed EU act is now available [here](#).

This text will need to be formally adopted by the European Parliament and Council of the EU before it is published in the Official Journal of the EU. The DSC is gathering views to put it in a more informed position when the published act is notified to it by Cabinet Office. [Read more about the Committee process here](#).

Specifically, the DSC is seeking your views on whether applying/not applying the act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist.

Should you wish to provide views, you can do so via Citizen Space at the following link: <https://consult.nia-yourassembly.org.uk/windsor-framework-democratic-scrutiny-committee/com-2023-462> .

Please note that the survey will close on **11 July 2024**.

Yours sincerely,

Assistant Clerk
Windsor Framework Democratic Scrutiny Committee