



HP Safety Requirements for Childcare Articles, Office and School Supplies, and Toys in Europe

Responsible Group	PPS Operations- Social & Environmental Responsibility
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Abstract	This document defines Hewlett-Packard Company's (HP's) minimum requirements for Childcare Articles, Office and School Supplies, and Toys sold in Europe through Snapfish that are HP brand products, HP owned brand products, and/or non-HP brand products.
Applicability	<p>The requirements in this document apply to suppliers, vendors, service providers, and other partners in Europe who, for the purposes of the relevant regulations and this document, are the manufacturers of Childcare Articles, Office and School Supplies, and Toys sold through Snapfish in Europe.</p> <p>A requirement to comply with this document shall be included in all HP contracts for design, manufacture, or purchase of Childcare Articles, Office and School Supplies, and Toys sold through Snapfish that are HP brand products, HP owned brand products, or non-HP brand products.</p>
Disclaimer	Certain jurisdictions may require specific electrical safety or electromagnetic compatibility requirements or certifications for electrical products. These requirements are not addressed in this specification.
Status	Approved

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This is a version of EL-MF895-01, HP Safety Requirements for Children's Articles, Office and School Supplies, and Toys in Europe prepared for the external portal.

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1 Introduction

Childcare Articles, Office and School Supplies, and Toys sold through Snapfish in Europe are subject to regulation by national authorities through *Directive 2005/84/EC Relating to Restrictions on the Marketing and Use of Certain Dangerous Substances and Preparations (Phthalates in Childcare Articles and Toys)* (“the Phthalates Directive”), *Council Directive 91/338/EEC Relating to Restrictions on the Marketing and Use of Certain Dangerous Substances and Preparations* (“the Cadmium Directive”), and *Directive 2009/48/EC on the Safety of Toys* (“the Toy Directive”), and may be subject to additional legal requirements. HP requires that all HP brand, HP owned brand, and non-HP brand products sold in Europe through Snapfish that are Childcare Articles, Office and School Supplies, or Toys meet or exceed all regulatory requirements in each country in which they will be sold or marketed. This specification describes the minimum requirements under the Phthalates Directive, the Cadmium Directive, and the Toy Directive that manufacturers of these products in Europe shall satisfy.

2 Scope

This document specifies HP’s requirements for all HP brand Childcare Articles, Office and School Supplies, Toys, and all parts, materials, or components that are incorporated into these products, including any and all photographic images, licensed images, icons, designs, decorations, motifs, pictures, graphics, themes, or other content added to a product according to customer specifications. All references to “HP brand” products in this specification mean products sold in Europe through Snapfish that are HP brand products, HP owned brand products, or non-HP brand products.

This document is intended to identify certain minimum requirements for Childcare Articles, Office and School Supplies, and Toys consistent with the Phthalates Directive, the Cadmium Directive, and the Toy Directive. This document is not intended to be a listing of all childcare article, office supply, school supply, or toy design or safety requirements that may be established by HP’s business units or by law. The Manufacturer’s compliance with this specification does not relieve or diminish the Manufacturer’s obligation to comply with any other HP product specification or its obligation to comply with all applicable laws. It is the Manufacturer’s responsibility to know and comply with other laws and requirements applicable to these products, as amended from time to time. Manufacturers should note that the EU is currently considering restrictions on Toys for chemicals not addressed by this document, including tris-(2-chloroethyl) phosphate (TCEP), tris-(1,3-dichloro-2-propyl) phosphate (TDCPP), tris-(1-chloro-2-propyl) phosphate (TCPP), and Bisphenol A (BPA).

3 Definitions

Terms *used* in this document have the following meanings:

- 3.1 Child Care Articles**—Any product intended to facilitate sleep, relaxation, hygiene, the feeding of children, or sucking on the part of children.
- 3.2 Manufacturer**—Any natural or legal person who manufactures a consumer product. For purposes of products sold through Snapfish, the Manufacturer is the person who produces the finished product, including the addition of any and all photographic images, licensed images, icons, designs, decorations, motifs, pictures, graphics, themes, or other content according to customer specifications.
- 3.3 Office and School Supplies**—Any product intended or designed to be used in an office or school setting. Examples of Office and School Supplies include, but are not limited to: notebooks; notepads; mouse pads; pens; and pencils.



3.4 Toys—Products designed or intended, whether or not exclusively, for use in play by children under 14 years of age. Examples of Toys include, but are not limited to: stuffed animals; dolls; and puzzles (with fewer than 500 pieces) and games with licensed images appealing to children, including but not limited to children’s cartoon characters, television or movie characters, or other images, icons, designs, decorations, motifs, pictures, graphics, themes, or other content appealing to children.

3.5 Wood, Paper and other Plant-based Products—Consumer products or packaging materials that contain wood material or other wild plant material.

4 Requirements

4.1 Toys

A Toy can be placed in the mouth by children if the Toy or any part of the Toy can actually be brought to the mouth and kept in the mouth by children so that it can be sucked and chewed. If the object can just be licked, it is not regarded as one that can be “placed in the mouth.”

4.1.1 The Manufacturer of each Toy sold through Snapfish is responsible for ensuring compliance with all requirements applicable to manufacturers of toys pursuant to the Toy Directive and the legislation implementing the Toy Directive in all jurisdictions where the Toy is sold. Some, but not all, of these requirements are set forth in Sections 4.1.2 through 4.1.9 of this Specification.

4.1.2 Bioavailability and Migration Limits

4.1.2.1 Beginning July 20, 2013, the following migration limits, from Toys or components of Toys, shall not be exceeded:

Element	mg/kg in dry, brittle, powder- like or pliable toy material	mg/kg in liquid or sticky toy material	mg/kg in scraped-off toy material
Aluminum	5625	1406	70000
Antimony	45	11.3	560
Arsenic	3.8	0.9	47
Barium	1500	375	18750
Boron	1200	300	15000
Cadmium	1.3	0,3	17
Chromium (III)	37.5	9,4	460
Chromium (VI)	0.02	0.005	0.2
Cobalt	10.5	2.6	130



Element	mg/kg in dry, brittle, powder- like or pliable toy material	mg/kg in liquid or sticky toy material	mg/kg in scraped-off toy material
Copper	622.5	156	7700
Lead	13.5	3.4	160
Manganese	1200	300	15000
Mercury	7.5	1.9	94
Nickel	75	18.8	930
Selenium	37.5	9.4	460
Strontium	4500	1125	56000
Tin	15000	3750	180000
Organic tin	0.9	0.2	12
Zinc	3750	938	46000

4.1.3 Carcinogenic, Mutagenic, and Reproductively Toxic Substances

4.1.3.1 Beginning July 20, 2013, Toys shall not contain any substances that are classified as carcinogenic, mutagenic, or toxic for reproduction (“CMR”) of category 1A, 1B, or 2 under Regulation (EC) No. 1272/2008 unless such substances are inaccessible to children in any form.

4.1.4 Phthalates

4.1.4.1 Each of the following phthalates shall not be used at a concentration greater than 0.1% by mass of the plasticized material in Toys:

- Bis (2-ethylhexyl) phthalate (DEHP)
- Dibutyl phthalate (DBP)
- Benzyl butyl phthalate (BBP).

4.1.4.2 Each of the following phthalates shall not be used at a concentration greater than 0.1% by mass of the plasticized material in Toys which can be placed in the mouth by children:

- Di-isononyl phthalate (DINP)
- Di-isodecyl phthalate (DIDP)
- Di-n-octyl phthalate (DnOP).

4.1.5 Benzene



4.1.5.1 No Toy or component part of a Toy shall contain more than 0.0005% (5 mg/kg) benzene in a free state per weight of the Toy or component part.

4.1.6 Polyaromatic hydrocarbons (PAHs)

4.1.6.1 In Toys each of the following PAHs shall not be present in more than 0.5 mg/kg in any rubber or plastic components that come into direct as well as prolonged short-term repetitive contact with the human skin or the oral cavity under normal or reasonably foreseeable conditions of use.

- Benzo(a)pyrene (BaP)
- Benzo(e)pyrene (BeP)
- Benzo(a)anthracene (BaA)
- Chrysen (CHR)
- Benzo(b)fluoranthene (BbFA)
- Benzo(j)fluoranthene (BjFA)
- Benzo(k)fluoranthene (BkFA)
- Dibenzo(a, h)anthracene (DBAhA)

4.1.7 Labeling requirements

4.1.7.1 Toys shall bear the following information:

- Name of the Manufacturer or HP
- Address where the Manufacturer or HP can be contacted regarding the Toy
- A type, batch, serial, or model number

If it is not possible for the information required by this Section 4.1.7.1 to fit on the toy, the information shall be provided on the Toy packaging or a document accompanying the Toy.

4.1.7.2 Toys shall bear any warning labels required by Article 11 and Annex V of the Toy Directive. The Manufacturer shall inform HP in writing when a Toy requires a warning label.

4.1.8 Conformity Assessment Procedures

4.1.8.1 Each Toy shall be manufactured in accordance with applicable harmonized standards. If a Toy is not manufactured in accordance with applicable harmonized standards, the product must be submitted by the Manufacturer to an EC-type examination in accordance with the procedures in Module B of Annex II of Decision No. 768/2008/EC.

4.1.9 Declarations of Conformity



- 4.1.9.1 The Manufacturer shall prepare a declaration of conformity declaring each Toy's compliance with all applicable laws.
- 4.1.9.2 Declarations of conformity shall be provided to HP. See Section 5.1.4 or Annex III of the Toy Directive for a sample declaration of conformity.

4.1.10 CE Marking

- 4.1.10.1 Toys shall bear the CE marking indicating compliance with all applicable Directives.

4.2 Childcare Articles

A Childcare Article can be placed in the mouth by children if a child's mouth if the Childcare Article or any part of *the* Childcare Articles can actually be brought to the mouth and kept in the mouth by children so that it can be sucked and chewed. If the object can just be licked, it is not regarded as one that can be "placed in the mouth."

4.2.1 Phthalates

- 4.2.1.1 Each of the following phthalates shall not be used at a concentration greater than 0.1% by mass of the plasticized material in Childcare Articles:

- Bis (2-ethylhexyl) phthalate (DEHP)
- Dibutyl phthalate (DBP)
- Benzyl butyl phthalate (BBP)

- 4.2.1.2 Each of the following phthalates shall not be used at a concentration greater than 0.1% by mass of the plasticized material in Childcare Articles which can be placed in the mouth by children:

- Di-isononyl phthalate (DINP)
- Di-isodecyl phthalate (DIDP)
- Di-ns-octyl phthalate (DnOP)

- 4.2.2** Childcare Articles that are also Toys shall comply with the requirements of Section 4.1 in addition to the requirements in this Section 4.2.

4.3 Office and School Supplies

- 4.3.1** Cadmium shall not be used to stabilize Office and School Supplies manufactured from polymers or copolymers of vinyl chloride.

- 4.3.2** Office and School Supplies that are also Toys shall comply with the requirements of Section 4.1 in addition to the requirements of this Section 4.3.



4.4 Wood, Paper and other Plant-based Products and Packaging

Consumer products and packaging materials must not contain any wood material or other wild plant material that was illegally sourced from its country of origin. Examples of illegally sourced materials include, but are not limited to: wood or wild plant materials stolen from parks, reserves, or other protected areas; materials harvested without permission or contrary to applicable harvesting regulations; materials for which the applicable royalties, taxes or fees were not paid; and materials exported in violation of log or other export bans. Suppliers must have a due diligence process to verify compliance of products with the material restrictions that wood and plant products are legally sourced, including obtaining the country of origin and genus and species of plant or wood material and maintaining records that verify the legal origin of plant materials used to produce products and packaging. This requirement applies to all wood materials and products thereof (including wood from planted forests) but does not apply to common food crops.

REACH (Registration, Evaluation, Authorization, and Restriction of Chemicals)

All products shipped to the European Union are subject to REACH regulations. Refer to the REACH and ECHA websites in the References Section below for further details on REACH regulations. For customer inquiries on REACH compliance for products supplied by a Manufacturer to Snapfish and offered for sale to European customers, HP will contact the Manufacturer for assistance on responding to the inquiries.

5 References

The following laws and guidance documents are provided by way of reference only. It is the *Manufacturer's* obligation to identify and comply with all applicable laws, including national legislation, and the applicable amendments at the time of the product introduction.

[Directive 2009/48/EC on the Safety of Toys](#) and [information about the Toy Directive](#)

[European Commission, Guidance documents on the Toy Directive](#)

[European Commission, Information on harmonized standards for toys](#)

[European Commission for Standardization \(CEN\), Information on acquiring EN 71](#)

[European Commission, Template for a sample declaration of conformity](#)

[Directive 2005/84/EC Relating to Restrictions on the Marketing and Use of Certain Dangerous Substances and Preparations \(Phthalates in Childcare Articles and Toys\)](#) and [information about the Directive](#)

[Council Directive 91/338/EEC Relating to Restrictions on the Marketing and Use of Certain Dangerous Substances and Preparations](#)

[Regulation No. 1907/2006 of the European Parliament and the Council Concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals \(REACH\)](#)

[ECHA – REACH Candidate List](#)



[Regulation \(EU\) No 995/2010 of the European Parliament \(EU Timber Regulation\)](#)

Revision History

Revision, Date, Change Number	Brief Description of change
A, 29-Mar-2012	Initial release.
B, 20-Aug-2013	Added point 3.5 under the section 3. Definitions Added points 4.4 and 4.5 under the section 4.Requirements
C, 09-Jul-2014	Updated Section 2 (Scope) to reflect proposed restrictions on TCEP, TCPP, TDCPP, and BPA. Updated Section 4.1.2 to reflect tightened barium restrictions. Added Section 4.1.6 to reflect new restrictions on PAHs.