

GUIDANCE DOCUMENT No 11
ON THE APPLICATION OF
DIRECTIVE 2009/48/EC ON THE SAFETY OF TOYS

**Toys intended for children under 36 months of age or
of 36 months and over**

This Guidance document is a non-binding document intended to provide guidelines to help Member States and stakeholders on the classification of toys intended for children under 36 months of age or of 36 months and over. The proposals in this document are not necessarily supported by all the experts in the Expert Group on Toy Safety. However, on the whole the document reflects the general approach of the Expert Group regarding the classification of toys intended for children under 36 months of age or of 36 months and over. The images appearing in the document constitute examples intended to facilitate the decision-making. They do not presuppose the conformity of the represented products¹.

This Guidance document does not relieve national authorities from their obligation to determine for any individual product, on a case-by-case basis, whether it falls within the scope of application of the Toy Safety Directive 2009/48/EC or within the scope of application of other sectoral legislation. The Court of Justice of the European Union has repeatedly held that the national authorities, acting under the supervision of the courts, must proceed on a case-by-case basis, taking account of all the characteristics of the product. Therefore, this document shall not “prescribe” which regulatory framework applies. Rather, it shall serve as one out of many elements supporting the national competent authorities in their case-by-case decision on individual products. In particular, this Guidance document does not prevent a national authority from consulting with colleagues from other regulated sectors concerned in order to reach a complete view on all aspects related to a given product.

This guidance document (including its classification criteria) is not meant to affect products already placed on the market before the revised document has been published on the Europa website.

¹ The views expressed in this document are not legally binding; only the Court of Justice of the European Union can give an authoritative interpretation of Union law.

TABLE OF CONTENTS

| | | |
|----------|---|-----|
| 1. | INTRODUCTION..... | 3 |
| 2. | LEGAL BACKGROUND..... | 4 |
| 3. | CRITERIA FOR THE CLASSIFICATION OF TOYS INTENDED FOR CHILDREN UNDER 36 MONTHS OF AGE..... | 5 |
| 4. | PRODUCT CATEGORIES | 7 |
| Annex 1 | Puzzles | 7 |
| Annex 2 | Dolls | 14 |
| Annex 3 | Soft and stuffed or partially stuffed toys..... | 20 |
| • | Soft and stuffed or partially stuffed toys (see Table 1) | 201 |
| • | Squishies (see Table 2)..... | 32 |
| Annex 4 | Fidget toys | 34 |
| Annex 5 | Modelling clay/dough, slime, soap bubbles | 37 |
| Annex 6 | Movable/wheeled toys | 42 |
| Annex 7 | Play scenes, constructed models and construction toys ... | 47 |
| Annex 8 | Game sets and board games | 55 |
| Annex 9 | Toys intended to be entered..... | 60 |
| Annex 10 | Toys intended to bear the mass of a child | 64 |
| Annex 11 | Toy sports equipment and balls | 68 |
| Annex 12 | Hobby horse / stick horse..... | 72 |
| Annex 13 | Push-pull toys and pull-along toys | 74 |
| Annex 14 | Audio/Visual Equipment..... | 78 |
| Annex 15 | Toy figures and other toys | 82 |

Toys intended for children under 36 months of age or of 36 months and over

1. INTRODUCTION

The Commission services asked the Member State experts on toy safety to reflect upon the criteria to be chosen in defining toys intended for children under or above 36 months of age.

The French authorities presented a comprehensive document on the classification of toys intended for children under or above 36 months of age. On the basis of the French authorities' reflections and the contributions from the Member State experts, the Expert Group on Toy Safety adopted the first version of this Guidance document in 2009. This first version focused on three categories of toys: jigsaw puzzles, dolls, and soft and stuffed toys.

In the meanwhile many new kinds of toys were developed and introduced on the European market. During the years a lot of disputes were reported because manufacturers and authorities had classified toys differently or because of different opinions between the member states regarding the correct age classification.

Therefore member state authorities as well as manufacturers and stakeholders asked for a revision of Guidance document No 11. On the basis of the draft document made by the ADCO Working group "Guide No 11" and the contributions from the Member State experts, the Expert Group on Toy Safety adopted the new version in 2023.

The CEN report CR 14379 "Classification of toys – Guidelines", which was the main background document for the old version, has been withdrawn in 2016.

CEN ISO/TR 8124-8:2016 Safety of toys - Part 8: Age determination guidelines are taken into account in the new version.

CEN ISO/TR 8124-8:2016 provides guidelines for the determination of the lowest age at which children start playing with toys in specific toy-categories. When a starting age is mentioned for specific categories of toys, it doesn't mean that all the toys belonging to that category must be classified as suitable for that age. Number of pieces, dimensions, level of detail and realism, special functions of the specific toy may change/increase the intended age.

Guidance Document No 11 is only intended to help in classifying toys as intended for children under or above 36 months of age. More detailed age determination as proposed in CEN ISO/TR 8124-8:2016 is not considered in this guideline.

The new version of this Guidance document No 11 includes a wider range of toy categories. In addition to dolls, soft and stuffed toys, puzzles, there are twelve more categories (see above: table of content, chapter 4. Product categories).

Toy categories for which specific guidelines are already available are not included, whether or not a distinction is made according to age groups in the current versions: concerns scooters (No 1), toys used in and on the water (No 7), pools (No 8), books (No 9), musical instruments (No 10), crafts (No 13), sports equipment (No 14), writing instruments and stationary (No 15), electronic equipment (such as personal computers and

game consoles) (No 16), disguise costumes (No 17), puffer balls and puffer toys (No 18), soother holder (No 19), decorative products and products for collectors (No 20). See https://ec.europa.eu/growth/sectors/toys/toy-safety/guidance_en.

Toy categories which are clearly intended for children 3 years and older are also not included (for example chemical experimental sets).

2. LEGAL BACKGROUND

Article 2 of the Toy Safety Directive 2009/48/EC defines toys as "products designed or intended, whether or not exclusively, for use in play by children under 14 years of age".

The Directive does not provide requirements regarding the different age classification grades. However, it acknowledges that children under 36 months of age are especially at risk because of their mouthing behaviour and their undeveloped or limited physical and mental maturity. Consequently, the Directive sets out particular stringent provisions for toys intended for those children.

Article 10 (2) of the Directive provides that "Toys, including the chemicals they contain, shall not jeopardise the safety or health of users or third parties when they are used as intended or in a foreseeable way, bearing in mind the behaviour of children." and "The ability of the users and, where appropriate, their supervisors shall be taken into account, in particular, in the case of toys which are intended for use by children under 36 months or by other specified age groups." An explanation of the intended versus reasonably foreseeable use of the toy is provided in the Explanatory Guidance Document on the Toy safety Directive Rev 1.10.

https://ec.europa.eu/growth/sectors/toys/toy-safety/guidance_en

Annex II Part I point 4 (d) provides that "Toys, which are clearly intended for use by children under 36 months, and their component parts and any of their detachable parts must be of such dimensions as to prevent their being swallowed or inhaled."

For toys which might be dangerous for children under 36 months of age Annex V Part B point 1 of the Directive requires that they must bear a warning, such as "Not suitable for children under 36 months" or "Not suitable for children under three years". The warning must be accompanied by a brief indication, which may appear in the instructions for use, of the specific hazard calling for this precaution. The warning can be replaced by the graphic shown in Annex V Part B point 1.

However, the obligation to affix the warning does not apply to toys which, on account of their function, dimensions, characteristics or properties, or on other cogent grounds, are manifestly unsuitable for children under 36 months of age.

On the other hand according to Article 11 (1) of the TSD "Toys shall not bear one or more of the specific warnings set out in Part B of Annex V where that warning conflicts with the intended use of the toy, as determined by virtue of its function, dimension and characteristics".

3. CRITERIA FOR THE CLASSIFICATION OF TOYS INTENDED FOR CHILDREN UNDER 36 MONTHS OF AGE

Toys could be designed in a such a way that some of their characteristics may appeal to children under 36 months of age while other characteristics may appeal to children above that age. In fact, the borderline between toys intended for children under and above 36 months of age is not always clear and easy to determine. In order to clearly identify the borderline some key factors were identified by the Expert Group on Toy Safety.

The distinction between toys for babies (up to 10 months) and toys for children 3 years and older is usually easy. Rattle-shaped toys and squeeze toys are usually clearly classified as toys for children under 3 years of age. Therefore it does not seem necessary to describe this toy category in more detail in a separate annex. Guidance document No 11 is intended to provide help to distinguish between toys for “< 3” and “3+”. However, it is not the aim of this guidance document to determine whether toys are to be classified as toys intended for children who are too young to sit up unaided.

The play value of a toy intended for children under 36 months could be determined by the following key factors, e.g.:

- (1) the psychology of children of under 3 years, particularly their need to “cuddle”;
- (2) their attraction to objects “which are like them”: baby, small child, baby animal, etc.;
- (3) their preference to imitate adults and their activities;
- (4) their mental development, particularly their lack of capacity for abstraction, low level of knowledge, limited patience, etc.;
- (5) their less developed physical abilities in terms of ease of movement, manual dexterity, etc. (the toy may be small and light for the child to handle it easily).

Some considerations have to be made:

- (1) It is the children's aptitudes to use a toy in accordance with its destination which justify the choice to intend them for children under or above 36 months of age; if this use can start before 36 months of age and continue thereafter, the toy has to be appropriate for children under 36 months of age;
- (2) If a toy involves small parts that can be swallowed or inhaled or if there is a risk of strangulation, this does not mean, *ipso facto*, that the toy is intended for children above 36 months of age;
- (3) Warnings on a toy such as "Not suitable for children under 36 months" or "Not suitable for children under three years" or the warning graphic referred to above must not be used as a justification to claim that a toy is for children above 36 months of age and incorrectly apply less demanding tests for such toys in order to 'demonstrate' conformity. The aforementioned warnings must therefore not be present on toys that meet the criteria for under 36 months of age while at the same time presenting risks for children of that age.

In the case of surprise packages the age classification always depends on the toy which is inside the package.

Please note that the size and weight indications provided next to the images shown in the following annexes serve to better describe the examples shown. This does not mean that they are to be considered as final classification criteria.

4. PRODUCT CATEGORIES

Annex 1 Puzzles

Children like playing with puzzles. Puzzles exist in various types and styles. In general, children starting at 12 months can play with puzzles depending of the type/style of puzzle. Puzzles require three major skills: the fine motor skill to take and place the pieces, the visual skills to identify if the pieces fit, and the cognitive skill to plan the placing of pieces.

Criteria that are important in determining the suitability of the puzzle for a particular age category are:

- number of the pieces;
- size of the pieces;
- theme / details of drawing;
- interlocking or loose pieces.




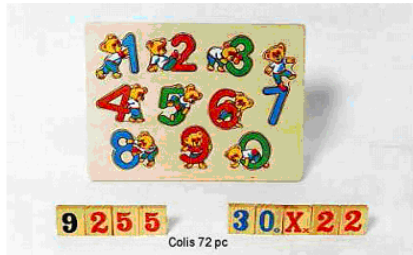
Children starting at the age of 19 months are interested in putting together objects that fit. Their play game is based on trial and error and they are not able to use strategies for completing puzzles. At around 2 years of age children begin to recognize puzzle shapes and angles and are able to fit a piece of a certain shape in a well with the same shape.




Criteria for classification "< 3“:



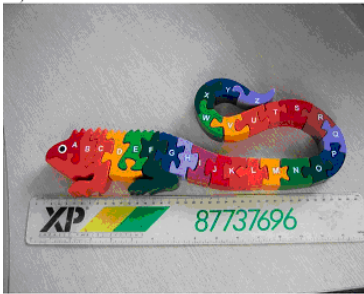

- large pieces;
- small amount of pieces that shall be connected in a specific order: up to around 10 pieces (for interlocking parts) or up to about 20 pieces (without interlocking parts)
- puzzles with simple frames;
- puzzles with easy to grip knobs;
- interlocking foam mats;
- large recognizable wells in certain shapes, like animals, vehicles;
- inset- and other fit-in type puzzles;
- puzzles pieces with smooth edges, which fit together without interlocking;
- pieces are interchangeable, can be placed randomly (similar shape, standard and identical indents);
- pieces can be interconnected at random, in no particular order (in this case the number of pieces can be higher);




Criteria for classification “3+“:


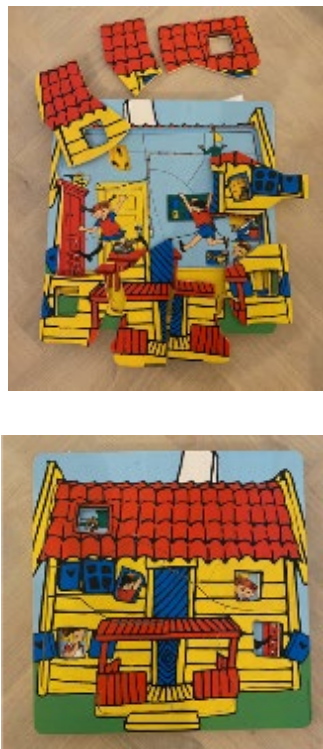
- puzzles with around 10 or more interlocking parts;
- puzzles that have different indents and can only be put together in one way in order to create a pre-designed shape or picture;
- 3-D puzzle;




| Puzzles | < 3 or 3+ | Description of product | Criteria |
|---|-----------|-------------------------------|---|
|  <p>No.1</p> | < 3 | Foam puzzle | <p>are interchangeable (same shape, standard and identical indents);</p> <p>can be interconnected at random, in no particular order; whatever their individual size.</p> |
|  <p>No.2</p> | 3+ | Foam puzzle | Puzzles with pieces that are not interchangeable, much smaller and there are many more of them (full size of finished puzzle is 31 by 22 cm) where the puzzle pieces depict a road and where the foam puzzles depict an intricate image |
|  <p>No.3</p> | 3+ | Foam puzzle - Hopscotch games | Hopscotch games with tiles that can only be arranged in a specific way and are therefore not interchangeable. Moreover, children play the game by hopping on one leg and for this reason it is too advanced for those under 36 months. |
|  <p>Collis 72 pc</p> | < 3 | Wooden puzzle | <p>Inlay puzzles with numbers. The success of such puzzles does not depend on being able to read numbers but recognizing shapes. Pieces are easy to grab with knobs.</p> |

| Puzzles | < 3 or 3+ | Description of product | Criteria |
|---|-----------|---|--|
| No.4 | | | |
|  <p>No.5</p> | < 3 | <p>Wooden puzzle</p> | <p>These puzzles offer a unique and clear opportunity to match the pieces:</p> <ul style="list-style-type: none"> one piece per hole; large-sized pieces which are easy to grab; the shape of the pieces is simple and easy to put together; small number of pieces. <p>Some puzzles have gripping knobs, others do not.</p> |
|  <p>No.6</p> | < 3 | <p>Wooden puzzle in the shape of a clock</p> | <p>Puzzles in the shape of a clock or a board or numbers, since the success of such puzzles does not depend on being able to tell the time or being able to count. Pieces are easy to grab with knobs.</p> |
|  <p>No.7</p> | < 3 | <p>2 in 1 wooden puzzle.</p> <p>In the upper part there is a inset puzzle with one piece per hole. Each piece is flat and has a knob to grasp.</p> <p>In the under part there is a 9-pieces interlocking jigsaw puzzle within a frame</p> <p>Dimension: ca. 20 cm x 30 cm</p> | <p>Simple design;</p> <ul style="list-style-type: none"> large pieces; small amount of pieces; puzzles with simple frames; puzzles with easy to grip knobs; |

| Puzzles | < 3 or 3+ | Description of product | Criteria |
|--|-----------|---|---|
|  <p>No.8</p> | < 3 | <p>Wooden puzzle with 6 animal figures. The figures are higher than the wooden plate.</p> <p>Dimension: ca. 20 cm x 20 cm</p> | <p>Simple design; small amount of pieces; inset puzzle; puzzles with easy to grip knobs;</p> |
|  <p>No.9</p> | 3+ | <p>Wooden puzzle with interlocking</p> | <p>Puzzle with interlocking pieces, which cannot fit randomly. According to the complexity of the subject and of the interlocking pieces, the size of the pieces and the difficulties in putting the puzzle together.</p> |
|  <p>No.10</p> | 3+ | <p>Wooden puzzle</p> | <p>According to the complexity of the subject, the number and size of the pieces and the difficulties in putting the puzzle together.</p> |
|  <p>No.11</p> | 3+ | <p>Mosaic Puzzle</p> | <p>Mosaic puzzles have geometric pieces which fit together, have different colours and can be arranged in various ways.</p> <p>Both these type of products can be used in increasingly complex ways: the children can recreate the images or make mosaics by arranging the colours.</p> <p>High amount of pieces which makes the puzzle more complex.</p> |

| Puzzles | < 3 or 3+ | Description of product | Criteria |
|---|-----------|---|---|
|  <p>No. 12</p> | | | |
|  <p>No. 13</p> | < 3 | <p>Jigsaw puzzle Dimensions: ca. 20 x 20 cm</p> | <p>9-pieces jigsaw puzzle with interlocking within a frame. The pieces can only be put together in one way in order to create the picture.</p> |
|  <p>No. 14</p> | 3+ | <p>Jigsaw puzzle Dimensions: ca. 20 x 20 cm</p> | <p>16-pieces jigsaw puzzle with interlocking within a frame. The pieces can only be put together in one way in order to create the picture.</p> |

| Puzzles | < 3 or 3+ | Description of product | Criteria |
|--|-----------|--|--|
|  <p>No.15</p> | < 3 | <p>Puzzle cubes Wood</p> <p>6 cubes intended to resemble 6 different pictures. Cubes are not interlocking, every surface contains a part of one of the pictures. By finding the right side of each cube, the child can create different pictures.</p> <p>Dimensions: 120 mm x 80 cm total</p> <p>Each cube 40 x 40 x 40 mm</p> | <p>can be used randomly easy to handle</p> |
|  <p>No.16</p> | 3+ | <p>wooden puzzle</p> <p>dimensions: 285 mm x 285 mm</p> | <p>8 pieces in 3 different layers (pictures), total of 24 pieces</p> <p>Pieces are big with simple shapes and not interlocking</p> |

| Puzzles | < 3 or 3+ | Description of product | Criteria |
|--|-----------|--|---|
|  <p>No.17</p> | 3+ | <p>Wooden insert puzzle in 4 layers</p> <p>dimensions: 142 mm x295 mm</p> | <p>puzzle in 4 different layers, 7 pieces per layer, 28 pieces total</p> <p>each layer fits into an inlay and is a little bit different in size. Even though the pieces are not interlocking, they have to precisely be assembled to fit in the respective layer.</p> |
|  <p>No.18</p> | < 3 | <p>Wooden puzzle 18 parts</p> <p>only 3 puzzle parts (head, body, feet) needed to lay a complete figure</p> <p>Dimension: 14 cm x 13 cm x 5 cm</p> | <p>Simple design; large pieces; small amount of pieces; puzzles with simple frames;</p> |
|  <p>No.19</p> | <3 | <p>Puzzle cubes Wood</p> <p>9 cubes intended to resemble 6 different pictures. Cubes are not interlocking, every surface contains a part of one of the pictures. By finding the right side of each cube, the child can create different pictures.</p> <p>Dimensions: 105 mm x 105 mm total Each cube 35 x 35 x 35 mm</p> | <p>Can be used randomly easy to handle</p> |

Annex 2 Dolls

Dolls can resemble a baby, a child, an adolescent or an adult and be either male or female or diverse. Dolls account for a very broad and diverse segment of the toy market, reflecting their design, level of realism and, in some cases, their accompanying accessories.

- **Dolls sold alone**

Criteria for classification “< 3”

- simple design;
 - lightweight dolls, neither very small nor very big (easy to hold)
 - flexible, soft, smooth, cuddly products which resemble babies or little children;
 - made entirely from padded fabric (examples 1 - 3);
 - bodies made completely from padded fabric, but with head and limbs made from rubber or PVC, or even totally made from rubber or PVC (examples 4 - 6);
 - head and limbs which can be moved only very slightly
 - simple actions which make the doll move, cry or talk (pulling a cord, pressing a button, etc.);
 - with little or no interaction.
- Non-determining factors (factors which should not be taken into account for age classification “<3” or “3+”):
 - hair, made from wool or imitation hair;
 - eyes which close
 - **Baby dolls and dolls sold with associated accessories**

- *Consumer packaging should be designed for children under 3 years old*

In addition to the doll with the accessories mentioned above, the consumer packaging may include the following accessories:

- non-removable clothes which the doll is already wearing;
- clothes which are easy to put on and take off, do not need adjustment, and are already worn by the doll or included as spare clothes;
- objects which are associated with children under 3 years old and which reflect their capabilities (potty, bib, plate, spoon, combs, etc).

- *Consumer packaging not intended for children under 3 years old but contain a doll suitable to this age group*

If the doll meets the requirement summarized under sub-heading ***Dolls sold alone*** (see above), it should be suitable for children under 3 years old. Children under 3 years old should only be barred from access to the toy on the basis of the clothes worn by the doll, or placed in the consumer packaging, and / or to its associated accessories:



- clothes which are difficult to adjust, button or put on, etc;
- shoes with straps or laces, etc;
- more elaborate accessories, for example, a backpack, small scooter, rollerblades, small furniture items, buggy, hair bands, etc.





○ *Dolls not intended for children under 3 years old*


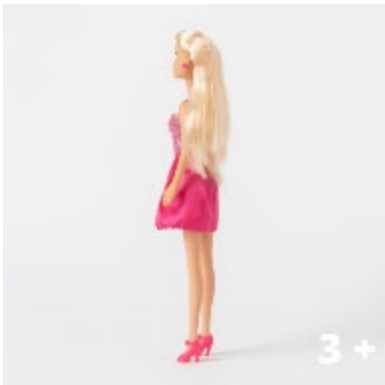

Criteria for classification “3+”




This category refers to dolls with which children do not identify themselves as “dad”, “mum”, “big brother”, “big sister”. Examples include:


- traditional dolls which are completely rigid, those with many joints, dolls which you can dress, do their hair, etc.;
- fashion dolls, for example dolls and their accessories as shown in example 8-10

| Dolls | < 3 or 3+ | Description of product | Criteria |
|---|-----------|---|--|
|  <p>No.1</p> | < 3 | Made entirely from padded fabric | <p>Product has a simple design, soft and flexible, easy to cuddle</p> <p>Non-removable clothes</p> <p>Rag dolls appeal to children under 3 years old and with which they identify themselves or can treat as their little sister/brother</p> |
|  <p>No.2</p> | < 3 | <p>Body, hands and legs made from padded fabric, but the head is made from rubber or PVC.</p> <p>Includes attached, non-removable rattles appealing for baby.</p> | <p>Product has a simple design. Soft and flexible, easy to cuddle.</p> <p>Non-removable clothes</p> <p>Bright colours</p> <p>Includes baby toys</p> |

| Dolls | < 3 or 3+ | Description of product | Criteria |
|---|-----------|--|---|
|  No.3 | < 3 | <p>Doll made entirely of padded fabric.</p> <p>The dress and hair ribbon can be changed.</p> <p>The hair made of Chenille threads can be combed and styled into braids.</p> <p>Dimension: Height ca. 30 cm</p> | <p>Simple design;</p> <p>Soft and flexible;</p> <p>Easy to cuddle;</p> |
|  No.4 | < 3 | <p>Bodies made completely from padded fabric, but with head and limbs made from rubber PVC, or even totally made from rubber or PVC.</p> | <p>Product has simple design</p> <p>Soft and flexible, easy to cuddle</p> <p>Clothes are easy to put on and take off, do not need adjustment</p> |
|  No.5 | < 3 | <p>Bodies made completely from padded fabric, but with head and limbs made from rubber or soft PVC, or even totally made from rubber or soft</p> <p>Pink fabric cannot be removed, shoes can be slipped on and off</p> <p>No functions</p> | <p>Product has simple design</p> <p>Soft and flexible, easy to cuddle</p> <p>Hands and legs can be only slightly adjusted</p> <p>Shoes are easy to put on and take off, do not need adjustment or tying laces</p> |
|  No.6 | Set 3+ | <p>Baby doll made from plastic material, approx. 43 cm; arms, legs and head are movable;</p> <p>Sold with complex accessories like real nappy;</p> | <p>Product has simple design</p> <p>Rigid material</p> <p>Position of hands and legs can be adjusted</p> <p>Can be dressed</p> <p>Requires ability to dress the diaper to the doll</p> <p>complex function like</p> |

| Dolls | < 3 or 3+ | Description of product | Criteria |
|---|-----------|---|--|
|  | | Set: for 3+ but doll: < 3 | feeding with some sort of pulp; activate body functions like pee and cry by pressing different body positions set with accessories: for 3+ doll: |
|  No.7 | 3+ | Fashion doll that is miniature of real person with fashion clothing and jewellery | Product has detailed design Rigid material Position of hands and legs can be adjusted Can be dressed Requires ability to dress |
|  No.8 | 3+ | Doll with hair, made from rigid material and has many joints. Height ca. 30 cm | It is possible to dress and do the dolls hair |

| Dolls | < 3 or 3+ | Description of product | Criteria |
|--|-----------|---|---|
|  <p>No.9</p> | 3+ | <p>Dressed fashion doll with hair and shoes; made of plastic; head, arms and legs movable;</p> <p>length approx. 28 cm</p> | <p>Detailed doll; hair dressing possible; cloths are not easy to put on, fine motor skills necessary</p> |
|  <p>No.10</p> | < 3 | <p>Doll with accessories</p> <p>Dolls body made completely from padded fabric, but with head and limbs made from rubber or PVC.</p> <p>Has a simple talking function by pressing button</p> <p>Includes books that child can read to the doll</p> <p>Includes feeding bottle and pacifier</p> | <p>Functions are easy to use for small children.</p> <p>Accessories are objects which are associated with children under 36 months of age and which reflect their capabilities (bottle, pacifier, etc.).</p> |
|  <p>No.11</p> | < 3 | <p>Doll with accessories</p> <p>Dolls body made completely from padded fabric, but with head and limbs made from rubber or PVC.</p> <p>Simple accessories for clothing, feeding and playing</p> | <p>Clothes are easy to put on and take off, do not need adjustment</p> <p>Accessories are objects which are associated with children under 36 months of age and which reflect their capabilities (potty, bib, plate, spoon, etc).</p> |

| Dolls | < 3 or 3+ | Description of product | Criteria |
|--|--------------|------------------------------------|--|
|  <p>No.12</p> | < 3 | Backbag with non-removable ragdoll | Simple design, soft stuffed, cuddly easy to use |

Annex 3 Soft and stuffed or partially stuffed toys

In this Annex soft toys are considered as well as soft stuffed and partially soft stuffed toys. No distinction is made between the wording “soft stuffed” and “soft filled”. “Filled” can be set for “stuffed” and the other way round.

Soft toys, by their nature, are cuddly toys due to their light, soft, spongy and smooth qualities. Very young infants have indeed a natural instinct to cuddle or be cuddled. Soft toys normally appear as baby animals or cartoon heroes. These are the kind of toys which attract very young infants and with which children instinctively identify themselves.

They encourage basic playing, not requiring any special learning. The toy acts as a companion for the child and they look upon it as a living person, carrying it around with them and taking it to bed, etc.

There are many soft toys available on the market which are actually designed or clearly intended for use in play by children under 36 months of age, or objects where, based on the reasons mentioned above, it would be reasonable to assume their use as toys for children under 36 months of age.

In nearly all cases, soft toys should be suitable for children under 36 months of age. While exceptions arising from a particular design of toy do exist, these are rare and reflect additional features which may hinder the child’s ability to cuddle the toy; the toy would therefore be regarded as being suitable for children over 36 months of age.

For toys with sequins see also Note from the ADCO Group to “[Soft-filled toys with sequins - 6 March 2019](#)”².

Examples of soft toys which should be considered as intended for children under 36 months of age are as follows:

- **Soft and stuffed or partially stuffed toys (see [Table 1](#))**

There are soft toys which are stuffed, partially stuffed or not stuffed (soft filled). The toys can have a dual function like soft toys attached to a key ring, animal shaped cushions, purses, backpacks, animal shaped water bottle cover, hair ribbon etc.

- **Squishies (see [Table 2](#))**

Squishy toys consists of soft material like foam or silicon. After being squeezed, they return to its original shape. They are produced in many different sizes and shapes, such as play figures, animals, fruits or other food items. There are also squishy toys where the foam is covered with textile.

Squishy products are also offered as anti-stress products or anti-stress toys. Nevertheless these products shall comply with the Toy Safety Directive 2009/48/EC if they are designed or intended - whether or not exclusively - for use in play by children. In addition, they must meet the stricter requirements on toys for children under 3 years, if the toys are intended or foreseeable for this age group.

Note:

For products which could be confused with foodstuffs see Council Directive 87/357/EEC of 25 June 1987 on the approximation of the laws of the Member States concerning products which, appearing to be other than they are, endanger the health or safety of consumers.



Criteria for classification “< 3”:




- Simple, robust design
- low degree of realistic detail
- Lightweight, soft, smooth, cuddly
- bright, vibrant or contrasting colours
- less features,
- little interaction





Criteria for classification “3+”:




- More realistic details
- Too large, heavy, unwieldy
- Higher motor skills required
- Many complex functions





Table 1 Soft and stuffed or partially stuffed toys




| Soft and stuffed or partially stuffed toys | < 3 or 3+ | Description of product | Criteria |
|---|-----------|------------------------|--|
|  <p>No.1</p> | < 3 | soft filled toy | Simple design, soft stuffed, soft and cuddly, vibrant and contrasting colours, |
|  <p>No.2</p> | < 3 | soft filled toy | Simple design, soft stuffed, cuddly, |




| Soft and stuffed or partially stuffed toys | < 3 or 3+ | Description of product | Criteria |
|--|--------------|--|---|
|  <p>No.3</p> | < 3 | Soft filled toys | Simple design, soft stuffed, cuddly, |
|  <p>No.4</p> | < 3 | Soft toys attached to a key ring; unicorn with sequins Dimension: ca. 5 cm x 10 cm x 7 cm | Simple design, soft stuffed, |
|  <p>No .5</p> | 3+ | Soft filled star with sequins; no animal; diameter ca. 9 cm | Not for cuddling, no smiley face, no animal. |




| Soft and stuffed or partially stuffed toys | < 3 or 3+ | Description of product | Criteria |
|---|-----------|--|-------------------------------------|
|  <p>No.6</p> | < 3 | Soft toy in form of a giraffe attached to a key ring, | Simple design, soft stuffed, cuddly |
|  <p>No.7</p> | < 3 | Soft toy attached to a carabiner; filled with a powdery, pliable material; Length ca. 12 cm | Soft and cuddly |
|  <p>No.8</p> | < 3 | 3D-Animal shaped cushion in form of a snail Dimension: ca. 50 cm x 30 cm x 15 cm | Simple design, soft stuffed, cuddly |
|  <p>No.9</p> | < 3 | 2D-Animal-shaped cushions in form of a beetle, the head is printed, the feeds are stuffed | Simple design, soft stuffed, cuddly |





| Soft and stuffed or partially stuffed toys | < 3 or 3+ | Description of product | Criteria |
|---|--------------|---|--|
|  <p>No.10</p> | < 3 | <p>Plush toy “Worry Eater” in the form of a crab with a zipper as mouth</p> <p>Dimension: ca. 23 cm</p> | <p>Simple design, soft filled, cuddly,</p> |
|  <p>No.11</p> | < 3 | <p>Animal-shaped cushions, stuffed animal heads</p> | <p>Simple design, soft stuffed, cuddly</p> |
|  <p>No.12</p> | < 3 | <p>Height gauges for children’s bedrooms which, when filled, are the shape of a soft toy</p> | <p>Simple design, soft stuffed, cuddly</p> |




| Soft and stuffed or partially stuffed toys | < 3 or 3+ | Description of product | Criteria |
|--|--------------|---|--|
|  <p>No.13</p> | < 3 | Purses | Simple design, soft stuffed, cuddly easy to use |
|  <p>No.14</p> | < 3 | Stuffed pencil case in form of an elk Dimension: ca. 27 cm x 15 cm | Simple design, soft stuffed,, cuddly, easy to use |
|  <p>No.15</p> | < 3 | Backpacks | Simple design, soft stuffed, cuddly, |
|  <p>No.16</p> | < 3 | Backpacks | Simple design, soft stuffed, cuddly, |

| Soft and stuffed or partially stuffed toys | < 3 or 3+ | Description of product | Criteria |
|--|--------------|--|--|
|  <p>No.17</p> | < 3 | Backpacks | Simple design, soft stuffed, cuddly, |
|  <p>No.18</p> | < 3 | Animal-shaped sleeping bags | Simple design, soft stuffed, cuddly, |
|  <p>No.19</p> | < 3 | Animal-shaped hot-water bottle cover The head and the feet are stuffed Dimension: ca. 36 cm x 26 cm | Simple design, soft filled, cuddly, |

| Soft and stuffed or partially stuffed toys | < 3 or 3+ | Description of product | Criteria |
|--|--------------|---|--|
|  <p>No.20</p> | < 3 | <p>Microwavable soft toy stuffed animal in form of a badger</p> <p>head and feet are soft filled</p> <p>Heatable in oven and microwave</p> <p>Filled with millet grain and lavender</p> <p>Dimension: Length ca.25 cm Weight: ca. 240 g</p> | Simple design, soft stuffed, cuddly, |
|  <p>No.21</p> | < 3 | <p>Animal-shaped pyjama cases</p> | Simple design, soft filled, cuddly |
|  <p>No.22</p> | < 3 | <p>Small suitcases with wheels in the shape of a bear, the soft toy part being removable</p> <p>bear and pig soft filled</p> | Simple design, soft stuffed, cuddly, easy to handle |

| Soft and stuffed or partially stuffed toys | < 3 or 3+ | Description of product | Criteria |
|--|-----------|--|--|
|  <p>No.23</p> | < 3 | <p>Small trolley with wheels and plush fabric cover. The soft toy in the form of a donkey can be removed.</p> <p>donkey soft filled</p> <p>Dimension: ca. 35 cm x 25 cm x 13 cm</p> | <p>Simple design, soft stuffed, cuddly, easy to handle</p> |
|  <p>No.24</p> | < 3 | <p>Soft toys which come with associated features and have actions to suit the more limited manipulative abilities of children under 3 years old should be regarded as intended for children under 3 years old</p> | <p>Simple design, soft filled, cuddly,</p> |
|  <p>No.25</p> | < 3 | <p>Soft toys which come with associated features and have actions to suit the more limited manipulative abilities of children under 3 years old should be regarded as intended for children under 3 years old.</p> | <p>Simple design, soft filled, cuddly,</p> |

| Soft and stuffed or partially stuffed toys | < 3 or 3+ | Description of product | Criteria |
|---|-----------|--|--|
|  <p>No.26</p> | < 3 | Soft toy “loaded” with a large present | Simple design, soft filled, cuddly, |
|   <p>No.27</p> | < 3 | <p>Soft stuffed dog within a handbag</p> <p>Collar, loop and handbag with sequins</p> <p>Dog, simple features, soft and cuddly: < 3</p> <p>Dimension: ca. 23cm x 23cm</p> | <p><u>Dog:</u> Simple design, soft filled, cuddly,</p> |
|  <p>No.28</p> | < 3 | <p>Soft stuffed dog sold with sequins bag, where the dog can be easily placed</p> <p>Height ca. 20-25 cm</p> | <p><u>Dog: Simple design, soft filled, cuddly.</u></p> |

| Soft and stuffed or partially stuffed toys | < 3 or 3+ | Description of product | Criteria |
|--|--------------|--|---|
|  <p>No.29</p> | < 3 | <p>Soft toy with sequins</p> <p>Height ca. 20 cm</p> | <p><u>Child-appealing design with low degree of realistic detail, soft filled, lightweight, little interaction with the sequins</u></p> |
|  <p>No.30</p> | < 3 | <p>Hair ribbon with a plush horse</p> <p>Dimension: ca. 6 cm x 5 cm</p> | <p>Simple design, soft filled, cuddly,</p> |
|  <p>No.31</p> | < 3 | <p>Hair ribbon in form of a plush tiger</p> <p>Dimension: ca. 20 cm x 7 cm</p> | <p>Simple design, soft filled, cuddly</p> |
|  <p>No.32</p> | < 3 | <p>Snap bracelet with plush horse/ rabbit</p> <p>Dimension of animal: ca. 6 cm - 10 cm</p> | <p>Simple design, soft filled, cuddly</p> |








| Soft and stuffed or partially stuffed toys | < 3 or 3+ | Description of product | Criteria |
|--|--------------|---|--|
|  <p>No.33</p> | < 3 | <p>Finger hand puppets in a shape of an animal or human or anything.</p> <p>Material textile.</p> <p>Fits for children's and adults' fingers / hands.</p> | <p>Simple design, easy to handle, lightweight,</p> |

Table 2 Squishies

| Squishies | < 3 or 3+ | Description of product | Criteria |
|---|-----------|--|--|
|  <p>No.1</p> | < 3 | <p>animal shaped squishy material soft foam</p> <p>Dimension: ca. 11 cm x 10 cm x 12 cm</p> | <p>Simple design, lightweight, soft, smooth, consisting of soft, squeezable material</p> |
|  <p>No.2</p> | < 3 | <p>Squishies in form of mermaid, unicorn and whale Material soft foam</p> <p>Dimension: ca. 10 – 11 cm</p> | <p>Simple design, lightweight, soft, smooth, consisting of soft, squeezable material</p> |
|  <p>No.3</p> | < 3 | <p>Squishy in form of teddy bear Material soft foam</p> <p>Dimension: ca. 10cm</p> | <p>Simple design, lightweight, soft, smooth, consisting of soft, squeezable material</p> |
|  <p>No.4</p> | < 3 | <p>Squishy in form of an animal. The inner material is made of soft foam and is covered with a fabric.</p> <p>Dimension: ca. Ø 10 cm</p> | <p>Simple design, lightweight, soft, smooth, consisting of soft, squeezable material</p> |

| Squishies | < 3 or 3+ | Description of product | Criteria |
|---|-----------|---|---|
|  <p>No.5</p> | 3+ | <p>Dropping of excrement</p> <p>Dimension: 8 cm diameter, 8 cm height</p> | <p>Not intended for a young child who could have the Temptation to squeeze a real poop</p> |
|  <p>No 6</p> | 3+ | <p>Squishy in form of different animals</p> <p>Length 4-5 cm</p> | <p>Very small figurines, not easy to grip and handle for children under 3 years of age</p> <p>Collective items for older children</p> |

Annex 4 Fidget toys

Fidget toys were originally designed to people who need to move in order to be able to concentrate, learn and be calm. Later they have become a toy desirable for all children. Fidget is usually a rather small object that can be squeezed, pulled, popped or moved around. For example squishies presented in Annex 3 (Table 2) can be used as fidgets, and also puffer figures which are discussed more closely in Guidance document No. 18 on puffer balls and similar toys.


“Pop it’s” are thick rubber plates which have bobbles that can be pushed from side to side. They can be used as such or as a game where players take turns pressing down any number of bubbles they wish in a single row. If the plate is not clearly a game, then it is considered to be meant for children under 36 months old.





Criteria for classification “< 3”:


- Simple design
- low degree of realistic detail
- Lightweight, soft, smooth, cuddly
- bright, vibrant or contrasting colours
- less features

Criteria for classification “3+”:

- More realistic details
- Too large to handle
- Requires finger power
- Clear game function
- Higher motor skills required
- Many complex functions

| Fidget toys | < 3 or 3+ | Description of product | Criteria |
|---|-----------|------------------------------|--|
|  No.1 | 3+ | Simple shaped pop it fidgets | Simple shape Easy to use, requires an ability to push as well as reasoning abilities. |

| Fidget toys | < 3 or 3+ | Description of product | Criteria |
|---|-----------|--|---|
|  No.2 | 3+ | Simple shaped pop it fidgets with capital letters in the bottom. | The game has an additional function which consists on creating words |
|  No.3 | < 3 | Colourful butterfly-shaped pop it fidget | Child appealing shape and bright colours Easy to use, requires only an ability to push |
|  No.4 | 3+ | Bubble board with dices, board game Size 19 x 35 x 2 cm | Game of chance (includes dice) |
|  No.5 | 3+ | Pea pod shaped fidget stress toy -keyring size 4 x1 cm | Fidget stress toy that requires coordinated finger techniques. |

| Fidget toys | < 3 or 3+ | Description of product | Criteria |
|---|-----------|--|--|
|  <p>No.6</p> | < 3 | Colourful octopus shaped pop it fidget | <p>Child appealing shape and bright colours</p> <p>Easy to use, requires only an ability to push</p> |

Annex 5 Modelling clay/dough, slime, soap bubbles

Children under 36 months like materials to mould and knead. They love the texture of materials and will use their hands to handle materials whenever possible. The process of creating art is more important to them than the final product, they use the material for manipulation instead of trying to make a specific shape using a mold. They also are able to play in sand with simple sand molds, shovels and sand buckets.

Furthermore children like to watch soap bubbles, they try to catch them and enjoy to see them pop. Some of the children already try to blow bubbles themselves.

Children aged 36 months and up begin to use clay and similar materials with molds to make shape and use it for early sculpting activities. Their fine motor skills are already further developed. They can manipulate clay and modeling dough, use craft sticks and plastic tools for the clay. They can also manage to play with liquid materials. They like slime and slimy products and are able to use tools for blowing soap bubbles correctly.


If modelling clay is sold as a set with tools (like a simple non-sharp knife, press, cutter, rolling pin), the basic material (modelling clay) still has to be suitable for children under 36 months.




Criteria for classification “< 3“:





- Easy to handle, soft material
- Easy to mould and knead
- Easy to form
- reuseable
- Different colours / bright colours





Criteria for classification “3+“:




- Material which is not easy to handle, liquid or semi liquid material
- Tools and accessories that require manual dexterity/fine motor skills
- Sets where specific results should be achieved (for example a cake with decoration)
- Can be swallowed easily

| Modelling clay/dough, slime, soap bubbles | < 3 or 3+ | Description of product | Criteria |
|---|-----------|---|---|
|  No.1 | < 3 | Soft modeling clay, sold in tins Different colours reuseable Material is intended to remain pliable and easy to form | Easy to handle, soft material Easy to mould and knead Easy to form reuseable bright colours |

| Modelling clay/dough, slime, soap bubbles | < 3 or 3+ | Description of product | Criteria |
|---|-----------|--|--|
|  <p>No.2</p> | < 3 | <p>Soft modeling clay, rod shaped</p> <p>Many different colours in one package</p> <p>reuseable</p> <p>Material is intended to remain pliable and easy to form</p> | <p>Easy to handle, soft material</p> <p>Easy to mould and knead</p> <p>Easy to form</p> <p>reuseable</p> <p>bright colours</p> |
|  <p>No.3</p> | 3+ | <p>Modeling clay / foam clay</p> <p>Material is intended to be air-drying/oven hardening</p> | <p>not easy to handle</p> <p>not easy to form</p> |
|  <p>No.4</p> | 3+ | <p>Bouncing Putty (Springknete)</p> <p>Material is difficult to form and to shape;</p> <p>to create a round form to make a bouncing ball or intended to be air-drying/oven hardening</p> | <p>not easy to handle</p> <p>not easy to form</p> |

| Modelling clay/dough, slime, soap bubbles | < 3 or 3+ | Description of product | Criteria |
|---|-----------|--|--|
|  <p>No. 5</p> | 3+ | <p>Set consisting of modelling clay and different tools</p> <p>Modelling clay as such is a pliable and easy-forming material</p> <p>Whole Set 3+ Accessories 3+</p> <p>BUT: Modelling clay/dough < 3</p> | <p>Tools and accessories that require manual dexterity/fine motor skills</p> <p>Sets where are specific results should be achieved</p> |
|  <p>No.6</p> | 3+ | <p>Modelling ferromagnetic clay with magnet with characteristics like a high stretchability, usable as bouncing ball, rips like paper, can diffuence; interacts with the magnet</p> | <p>not easy to handle not easy to form</p> |
|  <p>No.7</p> | 3+ | <p>Toy slime</p> <p>Aqueous hydrogels; stretchy, gelatinous consistency; often sticky. Hardly shapeable (doesn't keep the shape)</p> | <p>Material which is not easy to handle, liquid or semi liquid material</p> <p>not easy to form</p> <p>Can be swallowed easily</p> |
|  <p>No.8</p> | 3+ | <p>Soap bubbles</p> <p>Sold in small bottles with child appealing labelling; simple design of the container;</p> <p>often there's a small skill game included in the cap;</p> <p>fixed on the cap is a rod with a loop at the end to blow soap bubbles</p> | <p>Material which is not easy to handle, liquid or semi liquid material</p> <p>not easy to form</p> <p>Can be swallowed easily</p> |

| Modelling clay/dough, slime, soap bubbles | < 3 or 3+ | Description of product | Criteria |
|--|--------------|--|--|
|  <p>No.9</p> | 3+ | <p>Soap bubbles</p> <p>Sold in big plastic container in the shape of a stick or of a sword or similar (about 30 to 60 cm);</p> <p>fixed on the cap is a rod with a long oval to blow soap bubbles</p> | <p>Material which is not easy to handle, liquid or semi liquid material</p> <p>not easy to form</p> <p>Can be swallowed easily</p> |
|  <p>No. 10</p> | 3+ | <p>Soap bubbles</p> <p>Sold with a pistol to blow the soap bubbles by dipping and pulling the trigger (mechanical);</p> | <p>Material which is not easy to handle, liquid or semi liquid material</p> <p>not easy to form</p> <p>Can be swallowed easily</p> |
|  <p>No.11</p> | < 3 | <p>Animal shaped soap bubble gun</p> <p>Sold with a pistol to blow the soap bubbles by pulling the trigger. Battery operated.</p> <p>The soap bubble bottle is inserted into the pistol.</p> <p>Handle 7 cm high approx.</p> | <p>Very attractive.</p> <p>Once the bottle is inserted, it is very easy to operate, just by pulling the trigger.</p> <p>Very light</p> |
|  <p>No.12</p> | 3+ | <p>Soap bubbles</p> <p>Toy windmill</p> <p>Toy consists of a handle which contains the soap bubble solution and a windmill which is attached to the handle</p> <p>soap bubble solution is filled into the red plastic bowl, green circle with windmill is dipped into the solution</p> | <p>not so easy to handle</p> <p>big and heavy</p> |

| Modelling clay/dough, slime, soap bubbles | < 3 or 3+ | Description of product | Criteria |
|--|-----------|---|--|
|  <p>No.13</p> | < 3 | <p>Soap bubbles with duck</p> <p>Toy consists of a handle which contains the soap bubble solution and a duck which is attached to the handle by means of a spiral spring. The duck can be unscrewed and completely removed. The total length of the toy is approximately 30 cm. All parts are made of plastic material. If a child moves the handle, the duck swings back and forth or dances around. There's a kind of squeaking mechanism inside, so when a child moves the handle the duck will also "quak".</p> | <p>Was discussed on Wiki toys</p> <p>Soap bubble 3 +</p> <p>simple figure (duck)</p> <p>easy to handle</p> |
|  <p>No.14</p> | < 3 | <p>Soap bubbles and water / sand toys</p> <p>Water/sand toys made of plastic (shovel, sieve, rake) with soap bubbles in the handle (provided with thread), app. 28 cm long</p> <p>Soap bubbles 3+</p> <p>Water/Sand toy < 3</p> | <p>simple sand toy <3</p> <p>easy to handle</p> <p>simple design</p> |
|  <p>No.15</p> | < 3 | <p>Soap bubbles</p> <p>Bubble mower</p> <p>Mower < 3</p> <p>push and pull toy</p> <p>soap bubbles 3+</p> <p>by pushing and pulling the mower bubbles are generated</p> | <p>easy to handle</p> |

Annex 6 Movable/wheeled toys

Children under 36 month like miniature models of simple figures with low details and little vehicles which can be pushed. They use them for things like exploration, imitations by watching adults and pretend play.

Commonly, they like toys which are easy grasping and pushing with low degree of short cause and effect, for example direct movement, pull/push - make noise or pull/push - simple movements. Also multisensoric elements are attractive.

Between 8 and 12 month, children begin to train their fine motor skills with actions like grasping, pulling, pushing and stroking.

At the age of about 2, they can also manage simple screwing actions and a simple wind-up mechanism with low tension.


Children aged 36 months and up like mechanical and electrical vehicles which copy vehicles for adults. These vehicles are proportioned and have more details than toys for children under 36 months, realistic details like loose parts, decorations and printed words. They also may produce sounds, lights or talking.






Criteria for classification “< 3”





- One-piece constructions
- Wheels may spin
- Simple design
- lightweight toys, neither very small nor very big (easy to hold)
- Low level of details
- Colourful and bright
- Attractive for young children like animal babies, dog puppy
- Simple cause and effect




Criteria for classification “3+”

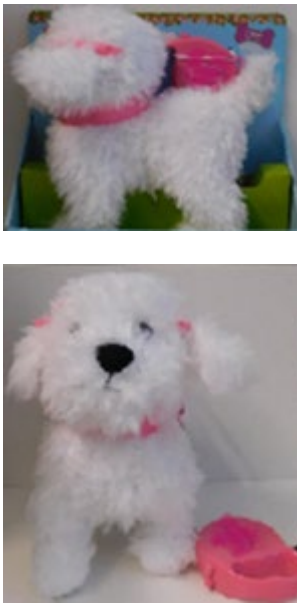


- Realistic details (e.g. car door to open)
- Proportional to an adult's vehicle
- Complex functions
- Higher motor skills required

| Movable/wheeled toys | < 3 or 3+ | Description of product | Criteria |
|---|-----------|--|---|
|  No.1 | < 3 | Simple vehicles Spinning parts (wheels, roller) Length approx. 8-12 cm | Easy to handle, low level of details, no special function |

| Movable/wheeled toys | < 3 or 3+ | Description of product | Criteria |
|---|-----------|---|--|
|  No.2 | < 3 | Simple vehicles Spinning parts (wheels) Light and sound effects Length approx. 10 cm | Easy to handle, low level of details, multisensoric elements |
|  No.3 | < 3 | Simple vehicles Spinning parts (wheels, roller) Whole Length approx. 24 cm, length single vehicles approx. 8 cm | Easy to handle, low level of details, no special function |
|  No.4 | < 3 | Simple vehicle Spinning parts (wheels) Moves automatically forward when pushed Length approx. 10 cm; Material: Plastic material simple designed; doors cannot be opened | Easy to handle, low level of details |
|  No.5 | 3+ | Fire truck with realistic details, approx.. 20 cm long Crane able to be turned and fold-out, basket can be tipped over | Proportional vehicle, realistic details |
|  No.6 | 3+ | Small metal car, approx.. 7 cm long, 2 cm high; Comic theme ("Mavel/Thor") | Proportional vehicle, realistic details |

| Movable/wheeled toys | < 3 or 3+ | Description of product | Criteria |
|--|-----------|--|---|
|  <p>No.7</p> | 3+ | Set of detailed agricultural vehicles; length approx.. 7 – 12 cm; trailers are changeable | Proportional vehicle, realistic details |
|  <p>No.8</p> | 3+ | Remote-controlled car, length approx.. 13 cm; steerable with remote control | Proportional vehicle, realistic details, difficult to operate |
|  <p>No.9</p> | < 3 | <p>Remote-controlled car car covered with plush soft figures</p> <p>the car drives forward and backwards in a left turn by pressing the button on the remote control the car makes a sound</p> <p>Dimension: 20 cm x 14 cm x 20 cm</p> | easy to handle soft figures |
|  <p>No.10</p> | < 3 | <p>Dog puppy, all plastic Walks forward and backward, barks , with light effects - by pressing on the head</p> <p>Length approx. 10 cm</p> | Easy to handle, children < 3 appealing shape, simple cause and effect |

| Movable/wheeled toys | < 3 or 3+ | Description of product | Criteria |
|--|-----------|--|---|
|  No.11 | < 3 | <p>Pony with spinning wheel; movement with wind-up mechanism possible;</p> <p>Height and length approx.. 9 cm</p> <p>Spinning wheel approx.. 2 cm long, diameter approx.. 0,7 cm</p> | <p>Bright colours, children < 3 appealing shape, playing also without wind-up possible</p> |
|  No.12 | < 3 | <p>Mouse (about 7 cm without tail) with wheels; moveable with an pull-back spring</p> | <p>Bright colours, children < 3 appealing shape, simple cause and effect</p> |
|  No.13 | < 3 | <p>Little plastic car with pull-back mechanism.</p> <p>Steering wheel rotates. The rear tires are rubberized, the front tires are hard plastic.</p> <p>By moving the car backwards the car is wound up.</p> <p>Dimension: 7 cm x 5 cm x 6 cm</p> | <p>Simple design, easy to handle, lightweight, no complex functions,</p> |

| Movable/wheeled toys | < 3 or 3+ | Description of product | Criteria |
|--|-----------|--|---|
|  <p>No.14</p> | < 3 | <p>Dog puppy, outer fabric plush, ,body made of hard plastic</p> <p>Walks forward by pressing a button, barks and tail waggles</p> <p>Length approx. 22 cm</p> | <p>Easy to handle, children < 3 appealing shape (baby animal), simple cause and effect</p> |
|  <p>No.15</p> | < 3 | <p>Battery operated dog, made of rigid plastic covered with fabric. With accessories: brush, bone, feeder and hair ties</p> | <p>Easy to handle, and play with. Simple accessories</p> |
|  <p>No.16</p> | 3+ | <p>Dog puppy, made of a hard body and covered with a thin plush fur fabric.</p> <p>Can be fed with small treats. If the dog is then pushed across the floor (wheel between the front legs) the dog poops out the treats. With a small gripper the treats can be picked up again.</p> <p>Dimension: 14 cm x 24 cm x 24 cm</p> | <p>hard body, not soft or cuddly, more complex to handle higher motor skills required</p> |

Annex 7 Play scenes, constructed models and construction toys

Children round 19 month of age start to be interested in blocks and interlocking building materials. Before that age, such materials are only be used as grasping objects. They are now able to stack blocks, can do simple assembly work and are amused in pull down their buildings.

Children under 36 month begin to engage in building play. They like simply handling objects and materials and use them for constructing or assorting. They like miniature models of simple figures with low details and bright colours and which are easy grasping and pushing. They use them for things like exploration, imitations by watching adults and pretend play.






Children aged 36 months and up have the fine motor skills to play more complex and to combine smaller pieces, their constructions become more advanced. They like more realistic looking (e.g. miniature people, model trees) and are able to build large simple tracks with easy connection. They are able to see the relationship between parts and can tell in advance if two parts will fit together just by looking at the parts - that means they often know if two parts will fit together, before they have actually tried putting them together. Now, they are able to work with connecting mechanism like snapping, screwing or pressing together. They explore the cause and effect of a moved car and watch it travel down a slope and the rate of speed.







Criteria for classification “< 3“





- Simple design
- Low level of details
- Few parts
- Materials like lightweight wood, cardboard, foam material
- Easy to grasp
- Simple connection systems
- Colourful and bright






Criteria for classification “3+“





- Realistic details
- Plenty of parts / accessories
- Complex assembly
- Adult subjects like space, castles, army




| Play scenes, constructed models, construction toys | < 3 or 3+ | Description of product | Criteria |
|---|-----------|---|---|
|   <p>No.1</p> | < 3 | <p>Fairy playground made of plastic. The leaves, the slide and the swing can be removed. The fairy figure can turn the head and bend the upper body downward.</p> <p>Dimensions: Tree with slide ca. 30 cm x 21 cm x 16 cm</p> <p>Fairy ca. 7 cm x 3 cm x 3 cm.</p> | <p>Easy to handle; Low level of details; No special functions;</p> |
|   <p>No.2</p> | 3+ | <p>Fairies scene made of plastic. Many small removable pieces like flowers, wings, mushrooms, etc..</p> <p>The fairy figures can turn the head and bend arm and legs.</p> <p>Dimensions: Tree ca. 13 cm x 11 cm x 5 cm</p> <p>Fairy ca. 7 cm x 7 cm x 3 cm.</p> | <p>Realistic details; Very filigree; Plenty of small detachable parts;</p> |
|  <p>No.3</p> | < 3 | <p>Traffic lane with simple vehicles and figures and some accessories like traffic signs, bridges,</p> <p>Simple vehicle, simple figures</p> | <p>Traffic lanes and accessories that require only low manual dexterity/find motor skills to build it up properly</p> <p>Easy to handle</p> |


| Play scenes, constructed models, construction toys | < 3 or 3+ | Description of product | Criteria |
|---|-----------|---|---|
|  <p>No.4</p> | Set 3+ | Construction set, Simple designed fire station with two vehicles, height approx. 15 cm; plug-in connection with a tool; no special function | Higher skills are needed to assemble |
|    <p>No.5</p> | Set 3+ | Simple designed parking garage with few parts and easy traffic lane; Specially designed for simple vehicles (like no 2 annex 6); sound and light effects of the cars can be triggered by moving over dentings in the lane; elevator can be lifted by a big crank (on the top of the tower) for vehicles sold alone see Annex 6, No 2 | Higher skills are needed to assemble easy cause and effect (activate lift by wind up) light and sound effects |
|  <p>No.6</p> | 3+ | Traffic lane with vehicles, figures and detailed accessories like traffic signs, bridges, barriers and fences | Traffic lane with vehicles and figures; special functions like a loading ramp and crane |
|  <p>No.7</p> | 3+ | Detailed play scenes with plenty of accessories Length ca. 0,8 – 8 cm | Realistic and complex, detailed |

| Play scenes, constructed models, construction toys | < 3 or 3+ | Description of product | Criteria |
|--|-----------|---|---|
|  <p>No.8</p> | 3+ | <p>Crane with wind-up mechanism and magnetic hook and simple vehicles</p> <p>Height crane approx. 22 cm, height figure approx. 4.5 cm, length vehicle 8 cm,</p> | <p>crane that requires manual dexterity/find motor skills to use it properly</p> <p>Whole set: 3+</p> |
|  <p>No.9</p> | < 3 | <p>Simple, colourful building blocks made of foam material; length between 4 – 7 cm;</p> <p>No special connection system</p> | <p>Easy to grasp, colourful, Simple building play</p> |
|  <p>No.10</p> | < 3 | <p>Simple, colourful building blocks made of wood/polymer mixture; length 12 cm;</p> <p>No special connection system</p> | <p>Easy to grasp, colourful, Simple building play; complex building play possible</p> |
|  | < 3 | <p>Simple, colourful building blocks made of hard plastic; length between 2 – 10 cm</p> <p>Big plug connection</p> | <p>Easy to grasp, colourful, easy connection</p> <p>Simple building play</p> |

| Play scenes, constructed models, construction toys | < 3 or 3+ | Description of product | Criteria |
|--|-----------|--|---|
|  <p>No.11</p> | | | |
|   <p>No.12</p> | < 3 | <p>Large foam blocks looking like real bricks. Light material. No connection system</p> <p>20 x 10 x 6.5 cm</p> | Easy to grasp, Simple building play. |
|  <p>No.13</p>  | 3+ | <p>Construction set, > 70 parts</p> <p>building blocks made from hard plastic</p> <p>building blocks similar to example No.3 (above)</p> <p>Assembly instructions for excavators and trucks and crane</p> <p>Dimension: blocks: length between 1,5 cm – 13 cm smallest block: 1,5 cm x 1,5 cm x 3cm head with helmet: ca. 2,5 cm x 3 cm</p> | <p>Higher skills are needed to assemble trucks and also the very simple play figures</p> <p>Complex constructions</p> |

| Play scenes, constructed models, construction toys | < 3 or 3+ | Description of product | Criteria |
|---|-----------|---|--|
|  <p>No.14</p> | 3+ | <p>Pluggable, colourful plates made of hard plastic,</p> <p>diameter ca. 4,5 cm</p> | plates with a connection system which need fine motor skills (small slots) |
|  <p>No.15</p> | < 3 | <p>Pluggable, colourful building blocks made of hard plastic, length approx.. 3 - 7 cm;</p> <p>Connection system out of slots</p> | Easy to grasp, colourful, Simple building play ; complex building play possible |
|  <p>No 16</p> | <3 | <p>Set consisting of 40 wooden building blocks in different shapes and colours</p> <p>Dimension:</p> <p>cubes about 3 x 3 x 3 cm</p> <p>quader about 3 x 3 x 6 cm</p> <p>cylinder about 3 (diameter) x 3 cm</p> | Easy to grasp and to handle; no connection system; Simple building play (Knowledge of numbers and arithmetic symbols is not necessary) |
|  | 3+ | <p>Construction set with different parts; made of wood and hard plastic;</p> <p>Connection with screws and screw nuts</p> | Construction set with a connection system which need fine motor skills |

| Play scenes, constructed models, construction toys | < 3 or 3+ | Description of product | Criteria |
|--|-----------|--|--|
|  <p>No.17</p> | | | |
|  <p>No.18</p> | 3+ | <p>Construction set with different parts; made of wood and hard plastic;</p> <p>Simple plug connection;</p> <p>End construction is a marble run</p> | Construction set which needs fine motor skills to build it up functionally |
|  <p>No.19</p> | 3+ | <p>Marbles run construction set</p> <p>different shaped hard plastic parts, marbles</p> <p>simple plug connection</p> <p>Dimension of the green parts: Height ca. 3,8 cm, Ø ca. 3,2 cm</p> | Construction set which needs fine motor skills to build it up functionally |

| Play scenes, constructed models, construction toys | < 3 or 3+ | Description of product | Criteria |
|--|-----------|--|--|
|  <p>No.20</p> | 3+ | <p>Construction set made of hard plastic; lot of parts with a small plug in connection; complex manual to build it up properly;</p> <p>part length starts with approx.. 0,8 cm</p> | Construction set which needs fine motor skills to build it up functionally |

Annex 8 Game sets and board games

Typically, game sets and board games start with games for 2 year old children and up. Below that age, the development of the cognitive and motor skills is neither perfected enough to take part nor they have the attention span required to participate. Game sets and Board games for children at this age are about simple matching or differentiation like lotto-type games, in which the matching is based on pictures, shapes or colours. One other child or an adult may be involved, or also the game is explored alone.

Games sets and Board games for children aged 36 months and up have more parts and rules. Still, they do not understand game strategy. Suitable games are based on chance, a game with no final winner or loser is preferred. They enjoy matching a memory games as well as active movement games and cooperative games. They start to recognize simple letters and numbers.





Parts, rules and also needed time increase with increasing age.



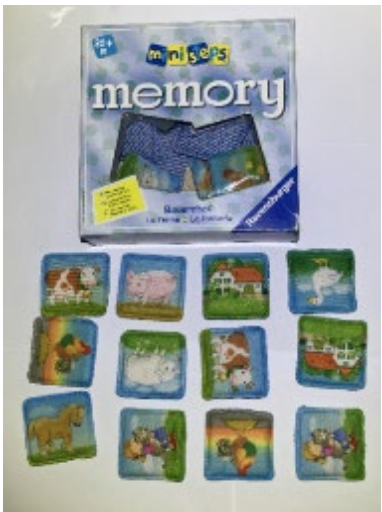
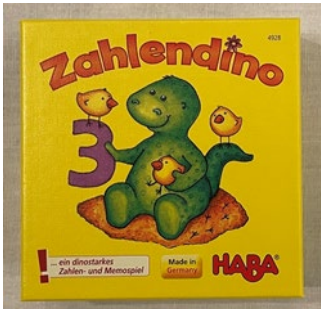
Criteria for classification “< 3”




- Simple design
- Colourful and bright
- Few parts
- easy to handle
- Easy grasping
- Very simple play rules
- Simple matching games
- Typically 1 or 2 players
- Usually allocating colours, items etc.



Criteria for classification “3+”

- Use of numbers or letters
- More difficult rules and strategies
- Increase of the play time
- higher motoric skills required

| Game sets and board games | < 3 or 3+ | Description of product | Criteria |
|---|-----------|--|---|
|   <p>No.1</p> | < 3 | <p>Simple “colour and items” - matching game; easy grasping; made of cardboard and wood; For 1-4 players</p> | Simple design, few parts, simple play rules |
|   <p>No.2</p> | < 3 | <p>Simple colour matching game; easy grasping; made of cardboard For 2-4 players</p> | Simple design, few parts, simple play rules |
| | < 3 | lotto game with simple motives; | Simple design, few parts, simple play rules |

| Game sets and board games | < 3 or 3+ | Description of product | Criteria |
|---|-----------|--|---|
|  <p>No.3</p> | | made of wood for 1-3 players | |
|  <p>No.4</p> | < 3 | <p>Domino made of cardboard.</p> <p>On the cards are large figures and a small cube with a number printed on it. The cards are lined up according to the picture or the number on the dice</p> <p>Dimension: 6 cm x 3 cm</p> | <p>Simple design, Colorful, Easy to handle, Very simple play rules,</p> |
|  <p>No.5</p> | < 3 | <p>Memory game with simple motives; made of stuffed fabric for 2-4 players</p> | Simple design, few parts, simple play rules |
|  | 3+ | <p>Game to allocate numbers and amounts; made of cardboard and wood for 1-4 players</p> | Educational game |

| Game sets and board games | < 3 or 3+ | Description of product | Criteria |
|---|-----------|--|---|
|  <p>No.6</p> | | | |
|  <p>No.7</p> | 3+ | Dice and draw game; made of cardboard and wood for 2-6 players | Parlour game |
|  <p>No.8</p> | < 3 | Fishing game with simple and big parts; Made of wood for 1-4 players | Simple design, few parts, simple play rules |

| Game sets and board games | < 3 or 3+ | Description of product | Criteria |
|---|-----------|---|--|
|  <p>No.9</p> | < 3 | <p>Fishing game with 4 fish of about 7,5 cm.</p> <p>The fish can be caught by fishing line with a magnet.</p> | <p>Children starting at 2 years are capable of playing fishing games with magnetic fishing rods.</p> |
|  <p>No.10</p> | 3+ | <p>Fishing toy</p> <p>Battery operated</p> <p>Moves while fishes open their mouths to get caught on the hook</p> <p>Requires a higher level of motoric skills</p> | <p>higher motoric skills required</p> |

Annex 9 Toys intended to be entered

Children between 18 and 36 month start to be interested in role play. They like toys which can be used to play “house/home”, toys which form an enclosed chamber to enter. Still they like low details and bright colours.

In some cases, toys intended to be entered by a child can also be used from children under 18 month, e.g. with simple accessories this age group appealing like simple balls, mobiles or stuffed toys


If toys intended to be entered by a child have realistic activities or are representing an adult subject, they can also be classified for children aged 36 months and up.

Criteria for classification “< 3“




- Simple design
- Low level of details
- Colourful and bright
- Simple accessories




Criteria for classification “3+“

- Realistic details
- Adult subjects like a stage
- Size
- Place of use (prevalent for out-door use)

| Toys intended to be entered | < 3 or 3+ | Description of product | Criteria |
|---|-----------|---|--|
|  <p>No.1</p> | < 3 | Colourful tipi (fabric made) with some accessories like simple plastic balls and a removable mobile with acoustic function; with a soft mat | Multi-functional, usable as tent, baby gym |

| Toys intended to be entered | < 3 or 3+ | Description of product | Criteria |
|---|-----------|--|---|
|  <p>No.2</p> | < 3 | Colourful pop-up tent (fabric made) with balls | Multi-functional, usable as tent or ball pool |
|  <p>No.3</p> | < 3 | Colourful pop-up tent (fabric made) with familiar character from media | Simple tent |
|  <p>No.4</p> | < 3 | Colourful house with garden (fabric made, with tent poles) | Simple tent/house |

| Toys intended to be entered | < 3 or 3+ | Description of product | Criteria |
|---|-----------|--|-------------------|
|  No.5 | < 3 | Colourful pop-up crawl tube (fabric made) | Simple crawl tube |
|  No.6 | < 3 | Simple tipi (fabric made, with tent poles) | Simple tent |
|  No.7 | < 3 | Simple house (made of cardboard); suitable for colouring | Simple house |

| Toys intended to be entered | < 3 or 3+ | Description of product | Criteria |
|--|-----------|--|---|
|  <p>No.8</p> | 3+ | <p>Colourful tent (height approx. 1.4 m, fabric made, with tent poles); folding front part; with light effects (like a mirror ball)</p> | <p>No typical house/home; represents a stage; also usable for role play “singer/star”</p> |
|  <p>No.9</p> | < 3 | <p>Colourful tents (length approx.. 3.4 m) fabric made, with tent poles), connected with pop-up crawl tube (fabric made); Tents/crawl tube can be used also disconnected</p> | <p>Simple tents and crawl tube</p> |
|  <p>No.10</p> | < 3 | <p>Play house, simple features like ringing the bell, open the windows etc. Dimension: ca. 185 cm x 110 cm x 148 cm</p> | <p>simple house, few parts to move, easy to enter and to play</p> |

Annex 10 Toys intended to bear the mass of a child

Toys intended to bear the mass of a child can vary a lot in design and can be all from plastic horses to ride on for toddlers to toy bicycles for children over 3 years.

For children under 3 years those toys require a lower level of coordination and balance. The child can stabilize on the toy by using the feet on the ground.

Toys for older children contain an extra feature, such as pedals which require the child to have a higher level of balance and coordination, since the feet are not used to stabilize anymore.


An under 3 classification does not mean that the toy cannot be anymore used when the child has reached the age of 3 years and over. However, the requirements of EN 71-1 on the maximum body weight of the child should be applied.





Criteria for classification “< 3”





- Child can stabilize the toy by using feet.
- More than two wheels/legs so that the toy can be easily balanced
- No extra features such as pedals


Criteria for classification “3+”

- Extra skill required, such as using the pedals to move forward, balance and stabilize the toy, breaks system that is operated from the handle etc.
- 2 wheels/legs with no extra stabilizer, which requires the child to have a high level of balance
- Toy is not stabilized by itself anymore

| Toys intended to bear the mass of a child | < 3 or 3+ | Description of product | Criteria |
|---|---------------------|--|--|
|  No.1 | < 3 | Jumping animal, low seat height Inflatable, seat height variable Dimension: ca. 54 cm x 45 cm x 22 cm | no complex range of movements additional hand grip low ascent height |

| Toys intended to bear the mass of a child | < 3 or 3+ | Description of product | Criteria |
|---|-----------|---|---|
|  No.2 | < 3 | Riding horse with small backrest Soft fur cover By pressing the ears galloping and neighing sounds are heard Dimension: ca. 68 cm x 50 cm x 25 cm | Simple design, soft and cuddly no complex range of movements required additional hand grip low ascent height |
|  No.3 | < 3 | Balance bicycle with handlebar pads, guards and plastic rims. The frame is made of steel. Saddle and handlebar are infinitely adjustable Dimension: 11 inch wheels; handlebar height 55-58 cm; saddle height 32-37,5 cm | Child can stabilize the toy by using feet, Low degree of balance required, low ascent height |
|  No.4 | < 3 | Ride-on car made of plastic. Steering wheel with integrated horn. Front and rear trailer hitch. Dimension: 60 cm x 30 cm 40 cm | Low degree of balance required, low ascent height |
|  No.5 | < 3 | Ride-on bike with horn and transport bag in the back. The frame is made of steel. The wheels, seat and handlebars are made of plastic. Dimension: 50 cm x 25 cm x 20 cm; Saddle height ca. 22 cm | Low degree of balance required, low ascent height |

| Toys intended to bear the mass of a child | < 3 or 3+ | Description of product | Criteria |
|---|-----------|--|---|
|  <p>No.6</p> | < 3 | <p>Three wheeler without foot pedals (movable by pushing wheels on the ground);</p> <p>Saddle height approx. 30 cm</p> | <p>no complex range of movements</p> <p>low ascent height</p> |
|  <p>No.7</p> | < 3 | <p>Three wheeler with foot pedals and slide rod;</p> <p>Saddle height approx. 40 cm</p> | <p>no complex range of movements</p> <p>low ascent height</p> |
|  <p>No.8</p> | < 3 | <p>Bouncy ball with handles inflatable, seat height variable</p> <p>Dimension: max 35 cm</p> | <p>Small ball, variable ascent height (depends on air volume), additional hand grip</p> |
|  <p>No.9</p> | < 3 to 3+ | <p>Bouncy ball with handles inflatable, seat height variable</p> <p>Dimension: max. 45 cm</p> | <p>variable ascent height (depends on air volume)</p> <p>additional hand grip</p> |

| Toys intended to bear the mass of a child | < 3 or 3+ | Description of product | Criteria |
|--|-----------|--|---|
|  No.10 | < 3 to 3+ | Bouncy ball with fabric cover inflatable, seat height variable Dimension: max. 45 cm | variable ascent height (depends on air volume) additional hand grip |

Annex 11 Toy sports equipment and balls

Toy versions of sports equipment are mainly aimed at children over 36 months. With increasing dexterity and understanding of game rules, older children can handle more complex toy sports equipment and perform more challenging games. Children under 3 years of age imitate sports activities only playfully, without following rules.



Balls are available in different types and sizes and are very appealing to children under 36 months. They can be rolled, thrown and caught, encouraging eye-hand coordination and the child's agility. Balls for elder children are often heavier and/or not so easy to throw or have a rougher surface.


Criteria for classification “< 3”





- easy to handle
- easy to grasp /grip
- light and/or soft material
- squeezable
- bright, colourful, contrasting colours
- simple design





Criteria for classification “3+”

- increased skills required (throwing, catching, balancing, coordination)
- Imitation of sports (e.g. soccer, basketball, badminton, bowling / play skittles)
- outdoor games (trampoline, skipping rope, frisbee disc, roller skates)
- games with rules

| Toy sports equipment and balls | < 3 or 3+ | Description of product | Criteria |
|---|-----------|---|--|
|  No.1 | 3+ | 3D plastic figure with throw rings Dimension: cross: ca. 56 cm, ring: Ø ca.14 cm | Increased throwing skills required |
|  No.2 | 3+ | plastic skittles set, very light plastic cones and ball Dimension: Heigth ca. 25 cm | Not easy to set up Increased throwing skills required Main play value is bowling |

| Toy sports equipment and balls | < 3 or 3+ | Description of product | Criteria |
|--|-----------|---|---|
|   No.3 | 3+ | Cones, hard plastic covered with neoprene, Small hard plastic ball Dimension: ca 7,5 cm x 21 cm; Ball Ø ca. 12 cm | Main play value is bowling Increased throwing skills required Heavy material, Rough surface |
|  No. 4 | < 3 | Squishy, soft filled plastic cones and ball Dimensions: Height of cones: ca. 17 cm. Diameter of ball: ca. 10 -11 cm. | Gross motor skills, easy to handle, hand-eye coordination |
|  No.5 | < 3 | Plushed toy skittles set fabric covered stuffed cone with animal head rattle inside large smooth standing surface Dimension: ca. 21 cm x 8 cm x 8 cm | Easy to set up, Lightweight, Soft material, cuddly Multiple play value (cuddly toy, rattle, bowling set) |

| Toy sports equipment and balls | < 3 or 3+ | Description of product | Criteria |
|---|-----------|---|--|
|  <p>No.6</p> | < 3 | <p>Hard foam cone set in shape of penguins foam ball lightweight large and wide standing area</p> <p>Dimension: Height ca. 14 cm; Ball Ø ca. 8,5 cm</p> | <p>Easy to handle and to set up, Dual play value (bowling, simple play figures) Light material</p> |
|  <p>No.7</p> | < 3 | <p>Large soft natural rubber ball, ribbed surface, Dimension: Ø ca. 17 cm</p> | <p>easy to handle and to grip, light material</p> |
|  <p>No.8</p> | < 3 | <p>Large smooth soft vinyl ball Inflatable Dimension: Ø ca. 23 cm</p> | <p>easy to handle, light material</p> |
|  <p>No.9</p> | < 3 | <p>Small soft plastic ball Inflatable Dimension: Ø ca. 10 cm</p> | <p>easy to handle, light material</p> |

| Toy sports equipment and balls | < 3 or 3+ | Description of product | Criteria |
|--|-----------|---|--|
|  No.10 | < 3 | Small foam ball very soft and crushable Dimension: Ø ca. 10 cm | easy to grip, soft material |
|  No.11 | < 3 | Simple, soft balls made of foam material. Dimension: Ø ca. 8 cm) | lightweight balls in bright colours |
|  No.12 | < 3 | Large soft PVC ball with a plush fur cover Dimension: Ø ca. 23 cm | easy to handle, soft material |
|  No.13 | 3+ | Small neoprene covered ball Hard rough surface Inflatable Dimension: Ø ca. 15 cm | Increased catching and throwing skills required, Not so easy to handle, Heavy material |

Annex 12 Hobby horse / stick horse


Hobby horses appeal to both younger and older children. Younger ones use them in role plays, and among older children hobby horses has raised to be more serious hobby, even international hobby horse races are organized.

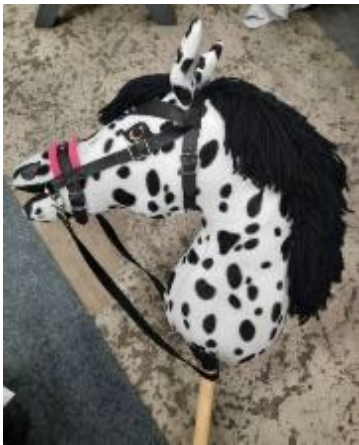


Criteria for classification "< 3"

- simple, childish design;
- child appealing colours
- usually soft and can be cuddled
- usually padded/fabric-coated stick
- non-removable bridles
- with little or no interaction (sound or light might be included).

Criteria for classification "3+"

- Realistic look
- Complicated removable bridles/straps
- Usually open mouth where bridles can be placed
- Size and weight too big for child < 3

| Hobby Horse / stick horse | < 3 or 3+ | Description of product | Criteria |
|---|-----------|---|--|
|  No.1 | < 3 | Hobby horse: with sound button head: stuffed toy with fur surface Stick: fabric coated plastic Bridles: simple, non removable Length: ca. 83 cm Weight ca. 350 g | Simple, childish, light weight hobby horse, that small child can handle Meant for simple role playing |

| Hobby Horse / stick horse | < 3 or 3+ | Description of product | Criteria |
|---|-----------|--|--|
|  <p>No.2</p> | 3+ | <p>Hobby horse: head: stuffed toy, fabric surface Stick: Wooden Bridles: Complicated with many buckles and a bit that is placed on the mouth</p> <p>Length: head only 38 cm Weight ca. 800g</p> | <p>More complex hobby horse, that requires strength to handle and fine motor skills to use the bridles correctly</p> <p>Meant for role playing and to be used in obstacle course</p> |
|  <p>No.3</p> | 3+ | <p>Hobby horse Head: Stuffed toy, fur surface Stick: Wooden Bridles: Removable, metallic bit that is placed on the mouth</p> <p>Length: 100 cm Weight ca. 560g</p> | <p>Rather simple, childish hobby horse</p> <p>Because of the weight requires moderate strength to handle and child needs to be tall enough for comfortable use</p> |
|  <p>No.4</p> | < 3 | <p>Hobby horse Head: stuffed toy, fur surface Stick: wooden, with two small wheels Bridles: not removable, stitched on Handles: wooden battery operated - with sound effects (if you press one of the ears the horse whinnies or you will hear the horse galloping)</p> <p>Length: 90 cm Weight ca. 400g</p> | <p>Simple, childish, light weight hobby horse, that small child can handle</p> <p>Meant for simple role playing</p> <p>Easy to handle because of the handles and the stick with wheels</p> |

Annex 13 Push-pull toys and pull-along toys

Push-pull toys

Children under 36 months like to use push-pull toys to develop their gross motor skills, commonly using them to take their first steps as they are pushing and pulling the toy around as they provide stability. These toys commonly help children around 12 months and up to stabilize while walking and are therefore designed in a simple way that children can hold on to. They commonly are of simple design with wheels.

Children aged 36 months and up like push-pull toys that imitate/copy devices used by adults. These push toys are more detailed and resemble real devices.

Pull-along toys

Younger children under 36 months love pull-along toys in the shape of animals that they can pull along on a string. These toys not only train fine motor skills by picking up the string, but also help to learn about the concept of cause and effect.




Pull along toys for children over 36 months are heavier and often not constructed in the form of colourful animals, but rather sledges or wagons.

Criteria for classification “< 3”




- Colourful design
- Invites the child to hold on to
- provides stability while learning to walk
- explore physical abilities such as push and pull without providing stability

Criteria for classification “3+”

- more realistic details
- more complex in design
- more functions
- heavier in design requiring more strength of the child

| Push-pull toys and pull-along toys | < 3 or 3+ | Description of product | Criteria |
|---|-----------|---|--|
|  <p>No.1</p> | < 3 | <p>Push toy to hold on to</p> <p>Toy consists of a handle to hold on to while learning to walk. Activity buttons on front that can be pushed and sound.</p> <p>Colourful design</p> | <p>Easy to handle</p> <p>Provide stability</p> |
|  <p>No.2</p> | < 3 | <p>Push-pull toy made of plastic</p> <p>Dimension: Ca. 600 mm high 200 mm broad</p> | <p>Light colourful design</p> <p>Explore physical ability</p> <p>Balls in the transparent bulb “jump” when the toy is pushed.</p> <p>Light and colourful plastic design</p> |
|  <p>No.3</p> | < 3 | <p>Lawn mower</p> <p>Dimensions: 460 mm x 280 mm x 560 mm (handle)</p> | <p>Lawn mower that makes motor sound while being pushed. At the same time, the little balls in the middle move.</p> <p>Additional detail in form of a gas tank to “refill” the lawn mower.</p> |

| Push-pull toys and pull-along toys | < 3 or 3+ | Description of product | Criteria |
|---|-----------|--|--|
|  <p>No.4</p> | < 3 | <p>Doll and other toys' carriage made of wood with a high handle.</p> <p>Dimension: 40 cm x 28 cm x 46 cm</p> | <p>Simple design, easy to handle, invites the child to hold on to, no complex functions</p> |
|  <p>No.5</p> | < 3 | <p>Very light plastic doll carriage with fabric cover. The front wheels swivel freely. Not foldable.</p> <p>Dimension: 45 cm x 38 cm x 54 cm</p> | <p>Simple design, Colourful design, invites the child to hold on to, no complex functions</p> |
|  <p>No.6</p> | 3+ | <p>Toy buggy/stroller</p> <p>Dimensions: 54,5 x 38,5 x 64 cm</p> <p>Weight 3 kg</p> | <p>Toy buggy/stroller for a doll.</p> <p>The stroller has a high level of realistic details and can even be adapted to different versions as a baby stroller and a buggy for the doll to sit in.</p> <p>Complex to put together to the different versions.</p> |

| Push-pull toys and pull-along toys | < 3 or 3+ | Description of product | Criteria |
|---|--------------|--|---|
|  <p>No.7</p> | < 3 | <p>Wagon to pull along</p> <p>Simple, light design out of hard plastic</p> | <p>Easy to handle and to pull along</p> |
|  <p>No.8</p> | < 3 | <p>Simple boat with wheels on lower side and a cord to pull</p> <p>Length approx.. 30 cm.</p> <p>Material: Plastic</p> | <p>Bright colours, children < 3 appealing shape, simple cause and effect</p> |
|  <p>No.9</p> | < 3 | <p>wooden pull along frog that plays drums</p> <p>Dimensions: Ca. 20 cm x 10 cm x 20 cm (l x w x h)</p> | <p>Colourful design in form of a frog that plays he drums when pulled along</p> <p>Simple design Colourful, in form of a frog</p> |

Annex 14 Audio/Visual Equipment

Children relate differently to audiovisual devices. While babies prefer soft, gentle and rhythmic sounds or voices, by getting older children develop more and more an urge to move from simple sounds and stories to more complex ones.





The cognitive abilities of the children also change. Children are increasingly interested in computer-based toys and interactive play, and enjoy exploring the cause-and-effect relationships. With increasing age they are also capable of operating devices with multiple buttons and more complex functions.




Criteria for classification “< 3“



- easy to handle to cause a sound or light effect
- few buttons to press
- simple rhythm, simple melody
- simple songs and stories

Criteria for classification “3+“

- more skills required
- more complex features available
- more complex rhythm or melody
- toy with video features and stories with brand toy figures or licensed toys

| Audio / visual equipment | < 3 or 3+ | Description of product | Criteria |
|---|-----------|--|---|
|  No.1 | < 3 | Plush teddy bear with plastic insert on belly, automatic night light effect (with colour change) and music playback function Battery operation, Dimension: ca. 41 cm x 37 cm x 17 cm | simple shape and design soft and cuddly, easy one button operation, simple melodies |
|  No.2 | < 3 | Plush hippo with plastic body and soft stuffed head Nightlight with projection effect and music playback Battery operated Dimension: ca. 26 cm x 16 cm x 16 cm | simple shape and design soft and cuddly, several simple control buttons, simple melodies |
|  No.3 | < 3 | Hard plastic bear with music playback function and rainbow projection effect Dimension: ca. 19 cm x 15 cm x 9 cm | simple shape and design easy to handle, |
|  No.4 | < 3 | Hard plastic water toy, float and light function, on contact with water it starts to glow and rotate and sprays a fountain, Battery operated Dimension: ca. 11,5 cm x 15,5 cm x 14 cm | simple shape and design easy to handle |

| | | | |
|---|---------------------|--|--|
|  <p>No.5</p> | <p>< 3</p> | <p>Toy mobile phone Buttons with different functions (songs, phrases, about numbers, counting, etc.) Battery operated</p> <p>Dimension: ca. 2,5 cm x 12,5 cm x 9 cm</p> | <p>Replication of a smart phone, several simple control buttons which are easy to handle simple and short melodies</p> |
|  <p>No.6</p> | <p>< 3</p> | <p>Battery operated CD Player, CD can be insert into a slot, Buttons with different music and light actions</p> <p>Dimension: ca. 7,5 cm x 28 cm x 24 cm</p> | <p>simple design easy to handle to cause a sound or light effect, simple songs, lightweight and portable</p> |
|  <p>No.7</p> | <p>< 3 to 3+</p> | <p>Little figure in the design of the respective audio play, hard plastic; different stories / songs can be downloaded/uploaded; simple songs / stories: < 3 to more demanding and longer stories and songs: 3+</p> <p>figures simple designed with limited details: < 3 detailed figures: 3+</p> <p>Dimension of figure : Height ca. 6 cm</p> <p>Battery operated music box with simple and few functions to operate.</p> <p>Dimension: ca. 12 cm x 12 cm x 12 cm</p> | <p>simple shape and design Easy to place on the audio box</p> |

| | | | |
|---|---------------------|--|---|
|  <p>No.8</p> | <p>< 3 to 3+</p> | <p>Interactive and bilingual picture book to tap handle for transport Sound effects, songs Battery operated</p> <p>Dimension: ca. 24 cm x 5 cm x 23 cm</p> | <p>simple function available and play modus available for children < 3 years and advanced function available for which more skill are required; 3+</p> |
|  <p>No.9</p> | <p>3+</p> | <p>Educational computer, Many different activities and modi can be selected via a sliding category switch below the screen. On the keyboard there are keys with numbers and keys with letters and corresponding illustrations. Battery operated</p> <p>Dimension: ca. 6 cm x 24 cm x 16 cm</p> | <p>advanced cognitive skills required, complex functions multiple control buttons heavy and bulky</p> |

Annex 15 Toy figures and other toys

In the case of figures the following factors should be considered:



- Psychology of children of under 3 years, particularly their need to “cuddle”: these toys cannot be hugged, so most of them would not meet this requirement. (However it could be considered a positive answer if the toy is “sweet”, “cute” or “lovely”, and he awakens the instinct to embrace).
- Attraction to objects “which are like them”: baby, small child, baby animal, etc: cartoon characters and superheroes especially if they are on TV are considered also attractive.
- Mental development: Children with start ages from 24-36 months do like role-playing, recognise names of fictional characters, have enough dexterity to grab small figures. The purpose of the game is simple, adapted to children under 36 months.
- Physical abilities (the toy may be small and light for the child to handle it easily): If it is made of plastic or rubber they can be considered light enough.




Criteria for classification “< 3”:




- Simple, robust design (e.g. rigid piece of rubber or plastic)
- low degree of realistic detail (When talking about real characters/animals it is easier to distinguish realistic features, but when it comes to TV or comic cartoons the level of detail is very ambiguous. However, it can be considered a low level of detail if the smallest details are not well differentiated or coloured, the features of the face are not detailed (without very realistic factions, hair, wrinkles or expressions), their clothes does not have folds and shadows, hands and/or fingers are not detailed.
- not realistic colours (however, depending on the figures, realistic colours can also be attractive for children <3)
- simple game that does not require the child to have fine motor skills, and coordination or play with it in a complex specific way,
- no articulations not actuated by small buttons or levers, or very simple articulations: hips (no knees), head (only turn around), arms (from shoulder, no elbows)
- no sophisticated accessories, shooting projectiles,
- does not need fine motor skills for the assembling




Criteria for classification “3+”:





- More realistic details
- higher agility or complex functions
- Higher motor skills required





| Toy figures and other toys | < 3 or 3+ | Description of product | Criteria |
|---|------------------------------------|---|--|
|  <p>No.1</p> | <p>3+ but big unicorns: < 3</p> | <p>Unicorns</p> <p>The set is composed of 3 unicorns, a brush, a comb and a magic wand with a star:</p> <p>2 big unicorns of 12 cm high, and 1 little unicorn of 8 cm high.</p> <p>The unicorns are made of hard plastic.</p> <p>Only the little unicorn has “real” hair that be brushed.</p> <p>The head of the 3 unicorns can turn.</p> | <p>The unicorns are very basic, have no details: points 5.03 and 5.15 of the table 6 in the ISO TR 8124-8, and are intended for children of 2 years and older.</p> |
|  <p>No.2</p> | <p>3+</p> | <p>Pony set composed of 2 ponies and 26 fashion accessories</p> | <p>The Ponies have detailed design and brushable hair. Head is articulated. The use of accessories requires a high level of motor skills.</p> |





| | | | |
|---|---------------|--|---|
|  <p>No.3</p> | <p>< 3</p> | <p>Small fabric covered animals firmly filled with sand.</p> <p>Dimension: ca. 8-12 cm</p> <p>Weight: ca. 40 -50 g</p> | <p>Simple design, hard filled with sand, smooth texture, not squeezable</p> |
|  <p>No.4</p> | <p>< 3</p> | <p>Silicon lid to cover beverage glasses / drinking cups. The figure in form of animals is removable.</p> <p>Material of the animal figures: silicon</p> <p>Dimensions: lid ca. Ø 9 cm; figures ca. 3,5 cm x 3 cm x 1 cm</p> | <p>Simple design, Less details, lightweight, smooth,</p> |
|  <p>No.5</p> | <p>3+</p> | <p>Animal figures made of plastic. They are stiff and not flexible</p> <p>Dimension: Duck ca. 5 cm x 5 cm x 3 cm, Horse ca. 13 cm x 10 cm x 3 cm</p> | <p>Detailed imitation, Very filigree appearance,</p> |

| | | | |
|---|---------------|---|---|
|  <p>No.6</p> | <p>< 3</p> | <p>Simple figure of a pig (soft plastic), Length approx. 7,5 cm</p> | <p>Simple design, Low level of details, Easy to handle</p> |
|  <p>No.7</p> | <p>< 3</p> | <p>Simple figure of a sheep (hard plastic), Length approx. 11 cm</p> | <p>Simple design, Low level of details, Easy to handle</p> |
|  <p>No.8</p> | <p>3+</p> | <p>Set of detailed animals (horse, pig, cow, rabbit, donkey, ...) and some sort of copse, all made of hard plastic, Length approx. between 4 - 10 cm</p> | <p>High level of details, realistic looking, not easy to handle</p> |

| | | | |
|--|---------------|--|--|
|  <p>No.9</p> | <p>3+</p> | <p>Detailed figure of a spider made of hard plastic</p> <p>length approx. 3,5 cm</p> | <p>Realistic looking</p> |
|  <p>No.10</p> | <p>3+</p> | <p>Pet or imaginary animal set sold with associated accessories.</p> | <p>Whole play set may be considered for 3+ but the plush should be suitable for children under 3 years old, so it should comply with <3 safety requirements.</p> <p>The same rules apply as for doll sets - see Annex 2 "Baby dolls and dolls sold with associated accessories", chapter "Consumer packaging not intended for children under 3 years old but contain a doll suitable to this age group"</p> |
|  <p>No.11</p> | <p>< 3</p> | <p>Surprise bag that includes a squishie in form of a snail</p> <p>material soft silicon</p> <p>Dimension: ca. 8cm x 6 cm x 5 cm</p> | <p>Simple design, lightweight, soft, smooth, consisting of soft, squeezable material.</p> |

| | | | |
|--|---------------|---|--|
|  <p>No.12</p> | <p>3+</p> | <p>Surprise bag with comic figure and comic booklet with short comic story inside</p> <p>Figure: hard plastic</p> <p>Height: ca. 7 cm</p> | <p>More detailed figures hard material.</p> |
|  <p>No.13</p> | <p>< 3</p> | <p>A role playing set for cutting bread and egg.</p> <p>The pieces are made of hard plastic.</p> <p>The 2 pieces of the egg, the bread can stick to each other with velcro.</p> | <p>Simple design with big pieces.</p> |
|  <p>No.14</p> | <p><3</p> | <p>Rigid plastic tea set.</p> <p>15 pieces: teapot, milk jug, sugar bowl, and lid for each one, etc.</p> | <p>Simple, easy to play with.</p> |
|  <p>No.15</p> | <p>3+</p> | <p>Metal kitchen set without drawing.</p> | <p>Simple and easy to handle and play with</p> <p>More realistic appearance.</p> |

| | | | |
|---|----|--|------------------------------|
|   No.16 | 3+ | Ceramic tea set. 3cm cup 7 cm teapot with lid. | Very realistic. |
|  No.17 | 3+ | Wooden coffee pot set. Includes cup, glass, capsule and arm. | Requires more ability. |
|  No.18 | 3+ | Rigid plastic coffee set. The coffee pot opens like a real coffee pot | Higher skill level required. |

| | | | |
|--|---------------|--|---|
|  <p>No.19</p> | <p><3</p> | <p>Rigid plastic coffee set.</p> <p>The coffee pot does not open like a real coffee pot</p> | <p>Easy to use</p> <p>Not detailed.</p> |
|  <p>No.20</p> | <p>3+</p> | <p>Magnetic garden</p> <p>This board contains 70 magnetic pieces.</p> <p>Some pieces are very small, until 2 cm.</p> <p>The aim is to learn about vegetables and fruits and how they grow.</p> | <p>The design is precise and not simplified.</p> <p>This game requires knowledge of fruits and vegetables, as well as where and how they grow.</p> <p>There is also an intention of interaction between different parts such as the watering can, the scarecrow</p> |
|  <p>No.21</p> | <p>< 3</p> | <p>Wooden toy</p> <p>Stacking toy</p> <p>Sort different parts according to form or colour</p> | <p>Simple sorting activity</p> |
|  | <p>< 3</p> | <p>Developmental play cube</p> <p>Combines different activities such as shape sorter, telephone and learning the clock</p> | <p>Simple matching activity</p> |

| | | | |
|-------|--|--|--|
| No.22 | | | |
|-------|--|--|--|