



Trade Barrier Data & Analysis Report for Children's Products in 2015

Hangzhou C&K Testing Technic Co., Ltd

Data Collected & Analysed by: Amanda Prepared by: Laura Translated by: Iris

Dear readers: The document prepared by C&K Testing aims to serve as a reference for the industry with all data collected and analysed by our technicians. We are trying our best to keep the information accurate, but make no guarantee for the full consistency with the official. We are honored in case of any reproduction for non-commercial purposes of information from the document provided that you acknowledge us as the source: "Source: C&K Testing".

Tel.: 86-571-87206587 E-mail: test@cirs-group.com Website: www.cirs-ck.com/en





Introduction:

By combing industry advantage of C&K Testing, the periodical prepared by our Technical Department targets at providing materials and real-time data in regard of trade and barriers suffered during trade for toy companies.

The following information is available in the periodical:

1. Export volume of children's products for the month
2. Import volume of such products by target countries for the month
3. Surveillance data from countries
4. News on toy regulations for the month
5. Other related information



Catalogue

- I Import & Export Data on Children's Products in 2015**
- II Dynamics on Children's Product Industry in 2015**
- III Surveillance Data on Children's Products from Major Trading Countries in 2015**
 1. **US** Customs LOA and CPSC Recalls in 2015
 2. **EU** RAPEX Notifications in 2015
 3. **Japan** NITE Recalls and Customs Violation Notification in 2015
 4. **South Korea** KATS Recalls in 2015
 5. **China** Violations Published by AQSIQ in 2015
- IV News on Regulations concerning Children's Products in 2015 (US, EU & China)**

Trade Barrier Data & Analysis Report for
Children's Products in 2015





I Import & Export Data on Children's Products in 2015

According to the data published by Chinese customs in 2015, there was an obvious increase in export of toys in China while a decrease in the import. As shown in the table, the US remained the largest market for Chinese toys and children's products followed by the EU. Based on statistics, China mainly imports toys from Japan and the EU. Meanwhile, we can see a decrease of 8.2% on a year-on-year (YoY) basis in toy import.



Import & Export Data on Toys, Game or Sports Products and Their Spare Parts in 2015

(Unit: RMB Ten Thousand Yuan)

| | US | EU | Japan | South Korea | Total Value of Import/Export | YoY |
|----------------------|-----------|-----------|-----------|-------------|------------------------------|-------|
| Import (from) | 90,025 | 167,185 | 173,680 | 43,822 | 11,701,234 | -8.2% |
| Export (to) | 9,412,795 | 6,366,216 | 1,357,702 | 518,388 | 26,534,009 | +12% |

Source: Chinese Customs

II Dynamics on Children's Product Industry in 2015

Data on Toys, Office Supplies and Sports Products in 2015

| Product | Current Period Inventory | Cumulative Delivery Value for Export | Main Business Income | Total Profit | Total Taxes and Fees |
|------------------------|--------------------------|--------------------------------------|----------------------|----------------|----------------------|
| Toys | 98.2% | ¥92.87 billion | ¥210.68 billion | ¥10.62 billion | ¥5.98 billion |
| YoY | +1.3% | +2.9% | +7.2% | +9.6% | +12.6% |
| Office Supplies | 97.3% | ¥19.25 billion | ¥97.08 billion | ¥5.74 billion | ¥3.04 billion |
| YoY | -0.2% | -3.6% | +9.3% | +11.0% | +14.3% |
| Sports Products | 98.5% | ¥54.50 billion | ¥139.31 billion | ¥8.15 billion | ¥4.95 billion |
| YoY | +0.1% | +0.5% | +7.0% | +14.8% | +15.4% |

Source: Chinese Ministry of Industry and Information Technology

III Surveillance Data on Toys from Major Trading Countries in 2015

1. US Customs LOA and CPSC Recalls in 2015

US Customs LOA (Letter of Advice published by CPSC against violations)

The US Consumer Product Safety Commission (CPSC) has published 2,228 LOA including 1,745 against Chinese products in 2015. According to analysis of C&K Testing, there were at least 1,197 out of 2,228 LOA targeting at toys.



Labelling was the top issue for LOA in 2015 and the third-party testing certificate came in the second place. The most common notified hazard was choking caused by small parts, and lead content also deserves attention of all exporters.

It is noted that art materials shall be attached with labels after going through chronic toxicological risk assessment (TRA) as per ASTM D-4236 if they are imported to the US, otherwise it would be deemed as violating against requirements in 16 CFR 1500.14(b)(8).

**US Customs LOA in 2015**

| Violating Provisions | Quantity of LOA | Remarks |
|-------------------------|-----------------|---|
| 16 CFR 1500 | 597 | Products requiring special labeling under section 3(b) of the act |
| 15 U.S.C. Â§ 2063(a)(2) | 262 | Product certification and labeling-Certification accompanying product; products with more than one manufacturer-Third party testing requirement |
| 16 CFR 1501 | 109 | method for identifying toys and other articles intended for use by children under 3 years of age which present choking, aspiration, or ingestion hazards because of small parts |
| 16 CFR 1500.14(b)(8) | 61 | special labeling of Art materials |
| 16 CFR 1303 | 59 | Ban of lead-containing paint and certain consumer products bearing lead-containing paint |
| 16 CFR 1615/16 | 44 | Procedure for consumer product safety rules |
| 15 U.S.C. Â§ 2058(a) | 17 | Procedure for consumer product safety rules- Commencement of proceeding; publication of prescribed notice of proposed rulemaking; transmittal of notice |
| 16 CFR 1510 | 12 | requirements for rattles |
| 16 CFR 1500.19 | 12 | Misbranded toys and other articles intended for use by children. |
| 16 CFR 1511 | 9 | requirements for pacifiers |
| 15 U.S.C. Â§ 2058(b)(1) | 7 | Procedure for consumer product safety rules-Voluntary standard; publication as proposed rule; notice of reliance of Commission on standard |
| 16 CFR 1500.18 | 4 | Banned toys and other banned articles intended for use by children |
| 16 CFR 1212.3 (a) | 2 | Requirements for multi-purpose lighters |
| 15 U.S.C. 2063(a)(5) | 1 | Product certification and labeling- Certification accompanying product; products with more than one manufacturer |
| 15 U.S.C. 2063(a)(1)(A) | 1 | Product certification and labeling- Certification accompanying product; products with more than one manufacturer |

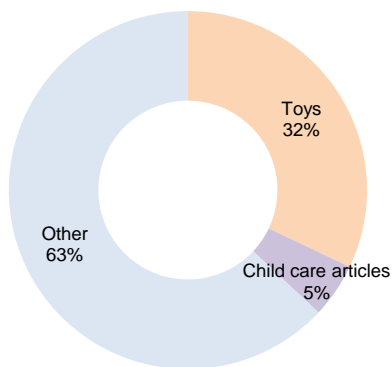
**CPSC Recalls**

Based on statistics of C&K Testing, CPSC has recalled 59 children's products in 2015 including 5 toys whose small parts would lead to choking and two other products due to dangerous levels of lead. Besides, there were 7 batches of children's pajamas recalled due to increasing concern on the flame retardant property. Electric shock, strangulation and drowning also gave rise to recalls of certain products.




2. EU RAPEX Notifications in 2015

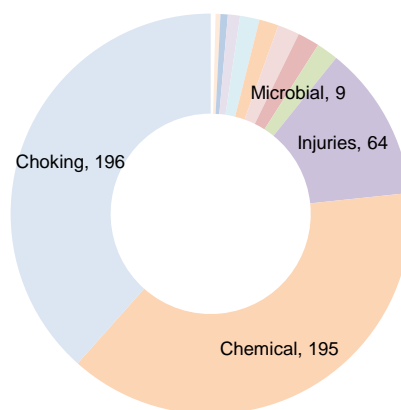
RAPEX



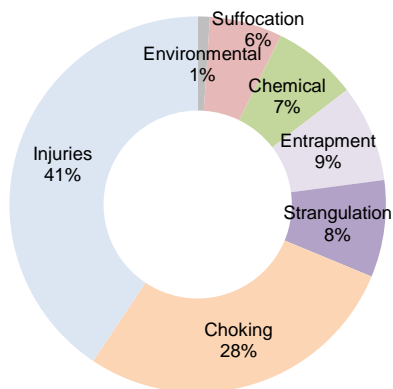
Statistics on EU Product Notifications in 2015

EU, another targeted market of Chinese children's products, has validated 1,856 products through Rapid Alert System for dangerous non-food products (RAPEX) in 2015, including 468 notifications on toys and 72 notifications on child care articles, sum of which accounting for nearly 40% of total notifications. The most notified products include toys, cribs, children's footwear, convertible baby carriages, highchairs, baby chairs and table chairs.

In 2015, EU RAPEX has validated toy notifications due to burning, chemical, choking, laceration, damage to hearing, damage to sight, environmental, entrapment, injuries, strangulation, suffocation and microbial hazards. Among the above hazards, the most frequently notified hazards are chemical (38%), choking (38%) and injuries (12%), accounting for almost 90% of all hazards.



Most Common Notified Types of Risk on Toys in EU (2015)



Most Common Notified Types of Risk on Child Care Articles in EU (2015)

Meanwhile, child care articles were notified through RAPEX system for chemical, choking, environmental, entrapment, injuries, strangulation and suffocation in 2015. Among the above hazards, the most common notified risks are injuries (41%) and choking (28%), the sum of which accounting for more than half of all risks.

EUROPE



3. Japan NITE Recalls and Customs Violation Notification in 2015



The data from Japan NITE have revealed that there were 23 recalls of children’s products in 2015: toys (7), children’s wear (8), child car seats (3) and other children’s products (5). Among the 8 recalls of children’s wear, 3 were caused by excessive levels of formaldehyde. In addition, Japanese customs issued Violation Notification in December against toy assembly made in China requiring to return the batch of products due to dangerous levels of DEHP.

4. South Korea KATS Recalls in 2015

South Korea has recalled 382 products, 151 of which were children’s products (mainly toys and children’s wear). The reason for such recall largely lies in chemical hazards (120 out of 151 cases), including: dangerous levels of phthalates, lead, nickel release, formaldehyde, benzene and other volatile compounds.



South Korea KATS Recalls in 2015 (Unit: case)

| | Electrical & Electronic | Industrial Goods | Children’s Products | Total |
|-----------------------------|-------------------------|------------------|---------------------|------------|
| The 1 st quarter | 16 | 9 | 40 | 65 |
| The 2 nd quarter | 52 | 28 | 24 | 104 |
| The 3 rd quarter | 47 | 8 | 39 | 94 |
| The 4 th quarter | 63 | 8 | 48 | 119 |
| Total | 178 | 53 | 151 | 382 |

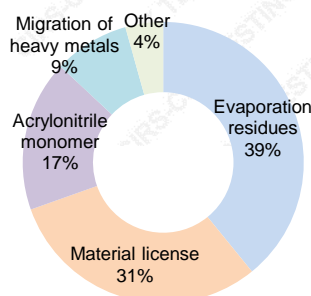
Source: KATS

5. China Violations Published by AQSIQ in 2015

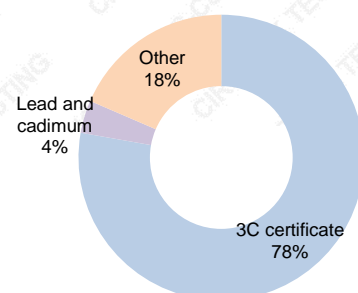


The statistics show that AQSIQ has published 1,158 batches of non-compliant products, and 142 of them were children’s products. All notifications on children’s products cover: toys, children’s textiles, disposable diapers, child car seats and food contact materials (FCMs) for children. The return of 78% toys resulted from lack of CCC certificate. While for children’s textiles, colour fastness was the top issue which was followed by formaldehyde and pH value. The FCMs recalls were frequent due to failure of obtaining material licenses, excessive evaporation residues and migration of heavy metals.

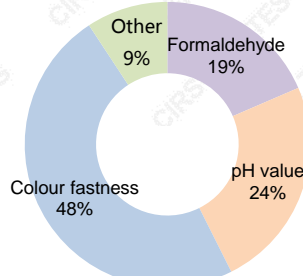
Reasons for Non-compliance of Imported Food Contact Materials by AQSIQ in 2015



Reasons for Non-compliance of Imported Toys by AQSIQ in 2015



Reasons for Non-compliance of Imported Children’s Textiles by AQSIQ in 2015





IV News on Regulations concerning Children's Products in 2015 (US, EU & China)



CPSC determines no testing for heavy metals in unfinished and untreated wood in toys

On 17 December 2015, the Consumer Product Safety Commission (CPSC) issued a final rule determining that unfinished and untreated trunk wood in toys does not require third party testing for the heavy element limits in ASTM F963. The rule will enter into force from 19 January 2016.

[Read More...](#)



A new mandatory safety standard for frame child carriers is approved

The U.S. Consumer Product Safety Commission (CPSC) has approved a new federal mandatory safety standard for child carriers on 18 February 2015. It adopts ASTM International (ASTM F2549-14a), Standard Consumer Safety Specification for Frame Child Carriers without further amendment. The new standard becomes effective 18 months since its publishing in the Federal Register.

[Read More...](#)



ASTM releases the new standard ASTM F3118-5 for infant inclined sleep products

In May 2015, ASTM released the new standard ASTM F3118-5 for infant inclined sleep products, which set forth safety and labeling requirements for infant inclined sleep products.

[Read More...](#)



Maine passes a bill to list four phthalates as priority substances

Recently Maine State passes a bill to list four phthalates as priority substances of Toxic Chemicals in

Children's Products Law, which becomes effective and enforceable immediately. This bill is applicable to manufacturers and distributors of the children's products, setting forth that no intentional addition of four toxic chemicals (DEHP, DBP, BBP and DEP) in consumer products.

[Read More...](#)



EU toy directive adopts five new restrictions

The *Official Journal of the European Union* published Commission Directives (EU) 2015/2115, (EU) 2015/2116 and (EU) 2015/2117 to amend Appendix C to Annex II of Directive 2009/48/EC (safety of toys) to include five new restrictions on 24 November 2015.

[Read More...](#)



Several updates on EU standards for children's products

European Commission published (EU) 2015/1345 to amend the references of standards on cords and drawstrings on children's clothing, on carry cots and stands, on safety barriers and changing units for domestic use under regulation of 2001/95/EC on 31 July 2015.

[Read More...](#)



CEN publishes a new safety standard EN 71-5:2015 for toys

European Commission for Standardization (CEN) approved Safety of toys - Part 5: Chemical toys (sets) other than experimental sets (EN 71-5:2015) to supersede EN 71-5:2013 on 10 August 2015. The new standard will be formally published on 31 March 2016.

[Read More...](#)



Chinese Standards for toy safety apply in January

Part 1-4 & Part 11-14 of GB 6675 Safety of Toys standards will apply since 1 Jan. 2016

[Read More...](#)



Amendment made to inspection requirements on toy

export

On 23 November 2015, General Administration of Quality Supervision, Inspection and Quarantine of the People's Republic of China (AQSIQ) issued Decree Z.G. No. 173 to amend *Measures on Administration for Inspection and Supervision of Toy Import and Export* (hereinafter referred to as the Measures) mainly involving the inspection of toys intended for export, which enters into force since the date of amendment.

[Read More...](#)



National Standard for Food Safety—Nipples applies in September

GB 4806.2-2015 National Standard for Food Safety—Nipples applies on 22 September 2016 superseding GB 4806.2-1994 Hygienic Standard for Rubber Nipple. GB 4806.2-2015 applies to products made of natural rubber, polyisoprene and silicone rubber. However, it is not applicable to pacifiers. Meanwhile, the standard shall comply with general safety requirements of national standard for food contact materials and products for food safety.

[Read More...](#)

Hangzhou C&K Testing Technic Co., Ltd

Contact Us

Hangzhou

Address: 1/F, No.4 Building, Huaye Hi-Tech Industrial Park, No.1180, Bin'an Road, Binjiang District, Hangzhou, Zhejiang, China

Tel:+86-571-87206587 Fax:+86-571-89900719 Email:test@cirs-group.com

Nanjing

Address: 2/F, Guangde Commercial Center, No. 158, Fangshui Road, Chemical Industrial Park, Nanjing, Jiangsu, China

Tel:+86-25-58390406 Email:cxid@cirs-cn.com

Beijing

Address: 9/F, Zhongyu Century, No. 31 Lianhuachi Road (E.), Haidian District, Beijing, China (Across the North Square of West Railway Station)

Tel:+86-010-63984062 Fax:+86-010-63984032 Email: xyn@cirs-group.com

Ireland

Address: Singleton House, Laurence Street, Drogheda, Co. Louth, Ireland

Tel:+353-41-9806916 Fax:+353-41-9806999 Email: louise@cirs.ie



Trade Barrier Data & Analysis Report

for Children's Products in 2015

www.cirs-ck.com/en