



香港玩具協會  
Hong Kong Toys Council

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15 March 2014

Ms Joanne Mak  
Clerks to Bills Committee  
Legislative Council

Dear Ms Mak,

**Toys and Children's Products Safety (Additional Safety Standards or Requirements) Regulation, Toys and Children's Products Safety Regulation (Repeal) Regulation and Toys and Children's Products Safety (Amendment) Ordinance 2013 (Commencement)**

Referring to your letter dated 4 March 2014, **Hong Kong Toys Council strongly suggests that all wordings / regulation should align with the current requirement under EU or USA.** Please see below elaborations for more details:

- (1) The current proposed regulation states the group 1 & group 2 phthalate requirement applies to “the total weight of all the plasticized materials in the toy or children products” which will take the risk of passing a ‘failed’ component on a typical toy.

Current proposed HK phthalate regulation applies to the “total weight of all the plasticized materials in the toy or children products” would dilute the phthalate requirement in the product. Please refer to the below example to illustrate the difference.

A plastic PVC toy doll with 3 plasticized materials:

- 1) Plasticized PVC material-1 in doll's head with 0.2% phthalate content.
- 2) Plasticized PVC material-2 in doll's hands with no phthalate content.
- 3) Plasticized PVC material-3 in doll's legs with no phthalate content.

Currently, EU or USA applies the phthalate requirement to each plasticized material separately and not the “total weight” of all the plasticized materials.

In the example above, the plastic doll with the 0.2% phthalate content violates current EU or USA phthalate requirement, but if Hong Kong considers the total weight of all the plasticized materials in toys or children product, the phthalate content would be considered as less than 0.1% due to the weight of plasticized PVC material-2 & PVC material-3 are also counted in the HK proposed regulation.

Furthermore, the proposed regulation requires testing of total phthalates and measurement of total weight of plasticized materials in a toy item. It is not quite feasible for toy made of multiple plasticized components, especially of large and bulky toys.





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(2) It is arguable to the applicable age group whether the regulation on mouth toy and child care articles should be applicable to children up to the age of 4 or up to the age of 6. It is kind of sociological and physiological question.

HK proposed regulation of group 2 phthalates applies to mouth toy for children up to the age of 4. But Japan applies the same on mouth toys to children up the age of 6; US applies this to children up to the age of 12 and EU applies this to the age up to 14.

Should you have any questions on the above, please do not hesitate to contact the Secretariat office at 2732 3188 or [hkto@fhki.org.hk](mailto:hkto@fhki.org.hk).

Yours sincerely,

John Tong  
Chairman, Hong Kong Toys Council

