



消費者委員會 CONSUMER COUNCIL

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來函檔號 YOUR REF: CB2/SS/4/13
本函檔號 OUR REF: CC1/257/RTP

14 March 2014

Hon Jeffrey LAM Kin-fung
Chairman of the Subcommittee
Legislative Council
Legislative Council Complex
1 Legislative Council Road
Central, Hong Kong

Dear Chairman,

**Subcommittee on 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) Notice**

The Consumer Council welcomes putting into operation the Toys and Children's Products Safety (Amendment) Ordinance 2013, and supports implementation of the relevant regulation as early as practicable.

Phthalates can be found not only in toys and children's products but also in general consumer goods and household products. In the interest of children who are less able to protect themselves, it has far-reaching effect to limit their exposure to phthalates in toys and children's products with which they are in direct contact on a daily basis.

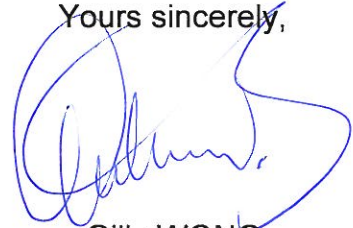
For smooth implementation of the new regulation, technical guidance and support to the industry could be rendered to help resolve difficulties they may have in complying with the latest requirements.

The Consumer Council would also stress upon the importance of reviewing the regulation from time to time so as to bring local safety standards more on par with international standards, and provide a safer environment to our future generation.

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The Consumer Council's previous submission to the Bills Committee on the (Amendment) Bill is attached for the easy reference of the Subcommittee.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Gilly Wong', is written over the typed name and title.

Gilly WONG
Chief Executive
Consumer Council

Consumer Council's Submission to the Bills Committee on Toys and Children's Product Safety (Amendment) Bill 2013

1. The Consumer Council (CC) supports the Legislative Council imposing concentration limits of phthalates in toys and children's products, so that restrictions locally will be in line with those adopted overseas such as the European Union, the United States, Canada and Singapore.
2. CC agrees that expanding the application of the Toys and Children's Products Safety Ordinance to cover other products that are intended to facilitate the feeding, hygiene, relaxation, sleep, sucking or teething of a child under 4 years of age and that contain any plasticized materials would be of high priority. However, CC is of the view that phthalates remain widespread in other consumer products that children are exposed to on a daily basis.
3. Studies by overseas (e.g. the US or Taiwan) and local organizations reveal that general consumer products such as plastic mats, rain boots, rain clothes, children's clothing, school supplies (e.g. vinyl backpacks and ring-binders) and other household products (shower curtains) which children use, contain elevated levels of the selected phthalates. Consumers are generally not aware of the presence of those phthalates in consumer goods because there is usually no information or labelling requirements with respect to phthalates. Young children often in contact with these phthalates-containing consumer products may be more vulnerable to the risk of phthalates exposure through ingestion, inhalation and direct contact.

CC therefore urges that consideration should also be given to further expansion of the definition of "children's product" beyond what is now proposed.

4. To reduce the risk of exposure of children to phthalates, the imposition of concentration limit should be reinforced by publicity and education about the risks of phthalates to children so that parents and care takers would be alert about the phthalate content in products that children use. They can be advised to purchase products which are in compliance with the phthalate limits or labelled "phthalates free", or monitor their children's use of products with plastic components not specifically designed for teething, sucking or feeding.

Consumer Council
5 November 2013