



Brussels, 11 April 2024

Re: Toxic-free toys for Europe - revision of the Toys safety legislation

Dear Minister,

European civil society organisations are calling on you to strengthen the Toys safety legislation, ensuring toys will be toxic-free and guaranteeing the highest level of protection for our children.

The European Commission evaluation from 2020 made clear that the current Toys safety directive needed to be improved to adequately protect children from the most harmful chemicals in toys. [1] However, the Commission’s proposal for updating the law contains several gaps.

The European Parliament has recently voted almost unanimously to fix this and make sure the reform fulfills the commitments made in the Chemicals strategy for sustainability.

We call on you to support European Parliament’s improvements to the Commission proposal, and in particular to ensure that the new regulation:

- Restricts the groups of ‘forever chemicals’, PFAS, and bisphenols in toys;

- Broadens the scope for restricting all the most harmful chemicals, and cover those that build up in human bodies and persist in the environment (PMT, vPvM, PBT, vPvB); and
- Sets strict rules for derogations to the generic restrictions.

Children are particularly vulnerable to harmful chemicals and have higher risks of adverse health effects, some of which can have a lifelong impact. The substances listed above are linked to certain types of cancer, and can impair the immune and endocrine systems - they can have adverse impacts even at very low doses. PFAS chemicals, known as 'forever chemicals' because they take generations to break down, can accumulate inside children's bodies. [2]

We expect EU lawmakers to guarantee that children are given adequate care and attention, based on all the scientific evidence available.

Our community of NGOs, consumers, medical and parents' associations is counting on you to ensure children's health and safety!

We would like to inform you that this letter will be made public.

Thank you for your consideration,

Stefan Scheuer (Chief EU Policy advocate at CHEM Trust) and Genon K. Jensen (Executive Director of HEAL) on behalf of the following organisations:

1. Arnika - Toxics and Waste Programme - Karolína Brabcová
2. Associazione Culturale Pediatri - Stefania Manetti
3. Bond Beter Leefmilieu - Danny Jacobs
4. Center for International Environmental Law (CIEL) - Giulia Carlini
5. CHEM Trust
6. Child Rights International Network - Suzanne Astic
7. Ecologistas en Acción - Kistiñe García
8. Environmental Coalition on Standards (ECOS) - Emily Best
9. European Confederation of Primary Care Paediatricians - Laura Reali
10. European Environmental Bureau - Patrick ten Brink
11. Fundación Alborada - Pilar Muñoz-Calero
12. Générations Futures - Yoann Coulmont
13. GLOBAL 2000 - FOE Austria - Helmut Burtscher-Schaden
14. Health & Environment Alliance (HEAL)
15. Health and Environment Justice Support (HEJSupport) - Alexandra Caterbow, Olga Speranskaya
16. Hogar sin Tóxicos - Carlos de Prada
17. ISDE (International Society of Doctors for Environment Italy) - Francesco Romizi
18. Journalists for Human Rights - Andrea Nakova
19. Mutualités Libres/Onafhankelijke Ziekenfondsen - Xavier Brenez
20. Portuguese Society of Environmental Health - Susana Paixão
21. Réseau Environnement Santé - André Cicolella
22. Safer Chemicals Alternative (ALHem) - Jasminka Randelovic
23. Tegengif - Annelies den Boer

24. Wen (Women's Environmental Network) - Kate Metcalf
25. Women Engage for a Common Future - WECF - Sascha Gabizon
26. ZERO - Susana Fonseca

[1] European Commission, [evaluation of the Toy Safety Directive](#) (19 Nov. 2020)

[2] European Society for Paediatric Endocrinology, [statement - The Detrimental Impact of Per- and Polyfluoroalkyl Substances on Children](#) (9 Nov. 2023)