

Template for scientific experts to amend: the [call for evidence](#) on toy safety

- ADD YOUR RESEARCH WHERE THERE IS RED TEXT AND TEXT YOU WANT FROM SECTIONS IN ITALICS
- DELETE SECTIONS YOU FEEL ARE IRRELEVANT TO YOUR WORK.
- COPY PASTE THE FINAL TEXT INTO THE [ONLINE FORM](#) UNDER QUESTION 2
- DEADLINE 6th OCTOBER

Question 2: What factors should be considered if the UK Government were to implement the same approach to the EU Toy Safety Regulation 2025/2509 across the whole of the UK?

- Overall, would you be in favour of legislation to introduce similar measures?
Yes.
- What would you see as the benefits of introducing the same approach?

The principal benefit of aligning UK toy safety requirements with the EU Toy Safety Regulation 2025/2509 would be stronger protection of children's health through reduced exposure to chemicals of concern. Toys deserve particular attention because they are products specifically designed for children and may involve frequent and prolonged contact, such as mouthing. Children are more vulnerable to the effects of some chemical exposures than adults because their biological systems and organs are still developing, particularly their immune, nervous and reproductive systems. Exposure to harmful chemicals during these critical periods can therefore have lasting effects on health and development.

Endocrine-disrupting chemicals

One of the most important improvements in the EU's updated toy safety regulation is a ban on substances classified under the EU Classification, Labelling and Packaging Regulation as known and suspected endocrine-disrupting chemicals (EDCs) for human health. EDCs are chemicals that [can interfere with the body's hormones](#). Hormones control many essential processes, including growth, development, reproduction and metabolism. Since the UK's current toy safety regulations were introduced in 2011, the scientific evidence on the potential health effects of EDC exposure has grown substantially.

Research has linked exposure to EDCs during childhood and other sensitive stages of development with a [range of health impacts](#), including effects on reproductive development, the immune and nervous systems, metabolism and the timing of puberty.

[INSERT YOUR EVIDENCE ON EDCs HERE]

Other information on EDCs you may want to include:

- Major international health and scientific organisations, including the [World Health Organisation](#) and the [Endocrine Society](#), recommend that governments take greater action to reduce exposure to EDCs.

- *Exposure to EDCs is widespread. The [HBM4EU human biomonitoring programme](#), which included 3,576 children aged 6–12 years, found widespread exposure to several chemicals and groups of chemicals with these properties, including phthalates and bisphenols. For several chemical groups, average exposure was [higher in children](#) than in older age groups.*
- *The UK population was not tested as part of this project; however, research conducted in the UK, such as by [Born in Bradford](#), suggests there is also widespread exposure to EDCs in the UK population.*
- *Feel free to add in the environmental angle too e.g. significance of widespread exposure to EDCs in the environment from their widespread presence in consumer products*

The HBM4EU project and many scientific studies have established that children are exposed to EDCs through many routes, including food, water, air and consumer products. There is increasing evidence that [combined exposures](#) to chemicals can lead to harmful effects, even if single substances in this ‘cocktail’ are below their individual safety levels. Therefore, where exposure can reasonably be reduced, particularly in products designed specifically for children such as toys, it makes sense to do so.

Bisphenols

On top of the ban on known and suspected EDCs classified under CLP, the EU decided to ban a group of bisphenols. This reflects growing scientific and regulatory concern about the health effects of bisphenols and the need to avoid replacing one substance of concern with another that may have similar properties. Human biomonitoring data suggests that this has been the case with Bisphenol A, or BPA, that has [frequently been replaced with BPS and BPF](#), which are thought to be similarly harmful.

[INSERT EVIDENCE ON BISPHENOLS]

Other evidence on bisphenols you may want to include:

- *The European Chemicals Agency (ECHA) has [assessed bisphenols as a group](#) and identified multiple substances with potential endocrine-disrupting and reproductive toxicity properties.*
- *The environmental angle e.g. bisphenols are found [widespread in rivers in the UK](#)*

Matching the EU’s ban on 10 bisphenols is important, especially in light of tests that have shown the presence of these substances in children’s [teething toys](#).

PFAS

The UK should also take a strong approach to PFAS (per- and polyfluoroalkyl substances) in toys as has been taken in the EU.

PFAS are a large group of highly persistent chemicals. Many break down very slowly in the environment and some can remain in the human body for long periods. This means that exposure can occur repeatedly from different sources and can contribute to a substantial overall body burden.

[INSERT EVIDENCE ON PFAS]

Other evidence on PFAS you may want to include:

- *The most studied PFAS, PFOA and PFOS, have been [classified as carcinogenic and possibly carcinogenic](#) respectively by the World Health Organisation's International Agency for Research on Cancer. However, there are a number of concerning [health impacts](#) that have been connected to exposure to other PFAS in the group, such as impacts on reproductive and immune systems, as well as effects on the metabolism.*
- *In a recent study, academics tested stuffed toys for infants and toddlers and [found PFAS in all samples](#). As with EDCs, PFAS in toys are only one potential source of exposure for children. UK-based studies, such as the [Avon Longitudinal Study of Parents and Children \(ALSPAC\)](#), and research from the [Scottish Advanced Foetal Research Study](#), suggest there is ubiquitous exposure to PFAS in the UK population.*

Reducing avoidable exposure to PFAS from children's products such as toys is important. Stronger restrictions on PFAS in toys would complement wider efforts to reduce children's exposure to these persistent chemicals, such as aligning with the [EU's PFAS restriction](#) under UK REACH when it is finalised.

Protection should extend beyond under-36-month toys

Children do not become significantly less vulnerable to harmful chemicals when they reach three years of age. The UK should therefore consider extending the more protective chemical limits that currently apply to toys intended for children under 36 months or toys designed to be placed in the mouth to all toys. Children continue to develop throughout childhood, and exposure to harmful chemicals during these developmental periods can still have important consequences for health.

INSERT EVIDENCE ON HARMS TO CHILDREN FROM CHEMICALS OVER AGE 3.

Other information you may want to include:

- *One of the chemicals that has had its protective limit extended to all toys in the EU regulation is BPA. [Exposure to BPA is known to harm health](#). In 2023, the EU lowered the level they consider it safe for the population to be exposed to BPA by 20,000 times. Based on the extremely low levels at which chemicals such as BPA can have negative impacts, it is a pragmatic to extend the most protective limits on harmful chemicals to all toys.*

Support for alignment on chemical measures:

The EU updated its toy safety regulation because scientific understanding has moved forward since the previous rules were established. The UK therefore has an opportunity to bring its toy safety rules into line with scientific understanding and reduce avoidable exposure to harmful chemicals in products designed for children.

Last year, 50 scientists, clinicians and healthcare professionals [wrote to the Government](#) calling for the UK to align with the EU's updated toy safety regulation. I urge the Government to heed this call and ensure that UK toy safety regulation reflects the best available scientific evidence, particularly by strengthening protections against endocrine-disrupting chemicals, PFAS and other harmful substances.

Protecting children from avoidable chemical exposure is a practical opportunity to support healthier childhoods and better health across the life course.

As an environmental scientist, you may also wish to include this sentence:

- *Limiting the presence of harmful substances in consumer products such as toys is important to reducing the quantity of harmful substances that enter our environment. Data from 2018 highlighted that [28 million toys](#) are thrown away in the UK each year.*