

October 26, 2024

State Administration for Market Regulation of the People's Republic of China
(Standardization Administration of the P.R.C.)
No.9 Madian Donglu,
Haidian District
Beijing, China
100088

VIA U.S. TBT enquiry point

RE: Notification G/TBT/N/CHN/1891 - Safety requirements for children's ride-on and activity articles

Dear Sir/Madam:

These comments are provided on behalf of The Toy Association, and our 900+ members, in response to China's notification (G/TBT/N/1891) to the World Trade Organization on August 27, 2024. We appreciate the opportunity to comment and thank the Standardization Administration of the P.R.C. for inviting input via the WTO TBT network, consistent with China's obligations under the *WTO Agreement on Technical Barriers to Trade*.

We welcome the Standardization Administration's proposed standard to update its general safety requirements for children's ride-on and activity articles. Toys are sold globally with generally the same specifications, facilitated by an increasingly aligned set of international standards and norms to address the safety of the products, reduce risks to consumers, and reduce the impact on the environment. Safety is a paramount concern for the U.S. toy industry, as evidenced by the fact that the industry and The Toy Association have been global leaders in toy safety for decades. The Toy Association continues to work with medical experts, governments, consumers, and industry to provide technical input to ensure that the ISO 8124, EN71, ASTM F963, IEC 62115, and other international and domestic standards/regulations keep pace with innovation and potential emerging issues and are aligned as closely as possible, taking into consideration legal mandates.

Based on our understanding, the proposed standard for children's ride-on and activity articles specifies several product categories that are not covered: 1) Products designed to be ridden on public transportation roads; 2) Products for stunt riding or performance; 3) Children's amusement, sports facilities and teaching aids used in public places; and, 4) Products covered by other specialized standardization technical committees. While we appreciate the additional context, we believe more clarity may be needed to avoid confusion. Specifically, we would suggest the standard clearly detail where the delineation is (or is intended to be) between ride on toys, which are covered by GB 6675, and items intended to be covered by this standard. Based on our reading of the documents provided, our understanding is that the proposed standard only intends to cover bicycles, tricycles, and similar products. Additional clarity on this matter would bring greater confidence and understanding.

We thank the Standardization Administration of the P.R.C. for the opportunity to comment on its proposal. Should you have any questions regarding our comments, please do not hesitate to contact me or my colleague Joan Lawrence. I can be reached at jhuxley@toyassociation.org, and Ms. Lawrence can be reached at jlawrence@toyassociation.org.

Sincerely,



Jos Huxley
Senior Vice President, Technical Affairs

About The Toy Association and the toy industry:

The Toy Association is the North American based trade association; our membership includes more than 900+ businesses – from inventors and designers of toys to toy manufacturers and importers, retailers, and safety testing labs – all involved in bringing safe, fun toys and games to children. The toy sector is a global industry of more than US\$90 billion annually, and our members account for more than half this amount.

Toy safety is the top priority for The Toy Association and its members. Since the 1930s, we have served as leaders in global toy safety efforts; in the 1970s we helped to create the first comprehensive toy safety standard, which was later adopted under the auspices of ASTM International as ASTM F963. The ASTM F963 Toy Safety Standard has been recognized in the United States and internationally as an effective safety standard, and it serves as a model for other countries looking to protect the health and safety of their citizens with protective standards for children.

The Toy Association is committed to working with legislators and regulators around the world to reduce barriers to trade and to achieve the international alignment and harmonization of risk-based standards that will provide a high level of confidence that toys from any source can be trusted as safe for use by children. Standards alignment assures open markets between nations to maximize product availability and choice.