



To Stéphane Séjourné, Executive Vice-President of the European Commission

14 March 2025, Brussels

RE: Toxic-free toys for European children - revision of the Toy Safety Directive

Dear Executive Vice-President Séjourné,

We appreciate your strong commitment to a zero-tolerance approach towards the most harmful chemicals in children's articles, as expressed during the European Parliament hearing in November 2024.

The EU now has a first concrete opportunity to start making this a reality through the revision of the Toy Safety legislation. The updated law must be strengthened to close existing protection gaps of the most vulnerable group in our society.

The Commission's proposal on the Toy Safety Regulation was a step in the right direction, especially opening up the possibility of restricting hormone-disrupting chemicals for human health. But it is missing several important protection aspects. We would like to mention two of them in this letter:

A restriction on PFAS, the ‘forever chemicals’

France and Denmark have already started restricting PFAS, certain US states phased them out from toys, and a growing number of companies are producing PFAS-free products.

Last year, the Parliament and Council, with the guidance of the Commission, agreed to restrict PFAS in food packaging rather than waiting several more years for the universal PFAS restriction to take effect.

We are concerned that not including a PFAS restriction in the Toy Safety Regulation would send a very negative signal, especially at a time when public concern over the risks posed by PFAS is so high.

A restriction of the bisphenols group

Scientists first identified that some bisphenols have endocrine disrupting properties in the 1930s. However, decades later, we still haven't done enough to protect people. The European Chemicals Agency identified around 150 bisphenols and many have been found in toys - in some cases up to six different bisphenols in a single toy. Studies show that children all over Europe are exposed to bisphenols, and their hormone disrupting effects may lead to developmental issues, obesity and cancer.

Worryingly, in 2022, the European Chemicals Agency demonstrated that at least 34 bisphenols may need to be restricted due to their interference with the hormonal system and effects on reproduction.

Yet, despite this warning, no action has been taken at the EU level. Banning these 34 bisphenols in toys is a concrete opportunity to demonstrate zero tolerance for the most harmful chemicals in children's products.

We count on your commitment and guidance as a trusted actor in the trilogues to revise the Toy Safety law in the European public interest and protect Europe's children from the most harmful chemicals in toys.

Thank you for your attention to this matter.

Yours faithfully,

Dr A. Michael Warhurst, Executive Director at CHEM Trust, on behalf of

Kistine García, Toxic Substances Coordinator on behalf of Ecologistas en Acción, Spain

Suzanne Astic, Child Rights International Network (CRIN)

Yoann Coulmont, Générations Futures, France

Nabil Berbour, Ekō

Kate Metcalf, Wen (Women's Environmental Network), UK

Susana Fonseca, ZERO - Association for the Sustainability of the Earth System, Portugal

Inès Martin, Bond Beter Leefmilieu, Belgium

Antoinette Vermilye, co-founder, Gallifrey Foundation

Francesco Romizi, Isde Italy, International Society of Doctors for Environment, Italy

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