

# Five markets. One pre-order checklist.

EU, UK, US, Canada and Australia: the standard, the marking, who signs, and the 12 checks we would run before a first order. Written for importers, brands and distributors buying wooden toys factory-direct.

## The five markets at a glance

| Market               | Core rule                                                          | Marking or certificate                                       | Who signs or holds                                                                                  |
|----------------------|--------------------------------------------------------------------|--------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|
| <b>EU</b>            | EN 71-1, -2 and -3; Toy Safety Directive 2009/48/EC                | CE marking                                                   | EU importer or authorised representative; EU declaration of conformity; technical file for 10 years |
| <b>Great Britain</b> | EN 71 designated standards; Toys (Safety) Regulations 2011         | UKCA or CE. CE recognition continued from 1 October 2024     | UK importer; UK declaration of conformity; technical file for 10 years                              |
| <b>US</b>            | ASTM F963; CPSIA lead and phthalate limits                         | Children's Product Certificate (CPC)                         | Importer or domestic manufacturer issues the CPC; testing at a CPSC-accepted laboratory             |
| <b>Canada</b>        | Canada Consumer Product Safety Act; Toys Regulations               | No pre-market certificate; evidence of compliance on request | Importer holds test records; warnings and instructions in English and French                        |
| <b>Australia</b>     | Australian Consumer Law; AS/NZS ISO 8124; ACCC mandatory standards | No pre-market certificate; evidence of compliance on request | Supplier or importer; records to show compliance                                                    |

## How to use this checklist

- Start with the destination market and the age grade. Both decide the test programme and the marking route.
- Ask for the test report for the exact item and material combination, not a report for a similar product.
- Ask for the carton data at the same time. Compliance and freight both decide whether a quotation works.

## The three documents that decide a first order

| Document                          | What to check                                                                                                                                                                                                |
|-----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Test report</b>                | Exact item and material combination; the standard and parts listed; a date after the last paint, board or supplier change; issued by an accredited or CPSC-accepted laboratory where the market requires it. |
| <b>Declaration or certificate</b> | EU DoC, UK DoC or US CPC. The right party signs it, the standard is current, and the importer or responsible person is named.                                                                                |
| <b>Carton and container data</b>  | Carton size, CBM, net and gross weight, units per 20 ft and 40 ft, and the mixed-load figure. A quotation that does not reconcile with these numbers is not finished.                                        |

## EU and Great Britain

### European Union

The legal basis is the Toy Safety Directive 2009/48/EC, implemented in each member state. A wooden toy is assessed against the EN 71 series: EN 71-1 for mechanical and physical properties, EN 71-2 for flammability, and EN 71-3 for migration of certain elements from coatings and inks. The manufacturer or importer draws up the technical file and signs the EU declaration of conformity. CE marking is self-declared, but the file has to support it. The technical file is kept for 10 years after the last unit is placed on the market. The EU importer or authorised representative must be identifiable on the product or packaging. The General Product Safety Regulation (GPSR) also applies to consumer products placed on the EU market; check the responsible-person and traceability duties for your route.

### Great Britain

Toys are regulated by the Toys (Safety) Regulations 2011. The designated standards are the EN 71 series, so one test programme can support both the EU and GB files. Since 1 October 2024, Great Britain has continued to recognise CE marking for toys, so either UKCA or CE can be used. The UK importer and the UK declaration of conformity still apply, and the technical file is kept for 10 years. A CE pack can serve both markets where the importer details align; otherwise plan two pack versions. Northern Ireland uses CE, or UKNI and CE where a UK notified body is involved.

## What changes between the two files

| Item        | EU                                                   | Great Britain                          |
|-------------|------------------------------------------------------|----------------------------------------|
| Standard    | EN 71-1, -2, -3                                      | EN 71-1, -2, -3 (designated standards) |
| Marking     | CE                                                   | UKCA or CE                             |
| Declaration | EU declaration of conformity                         | UK declaration of conformity           |
| Importer    | EU-established importer or authorised representative | UK-established importer                |
| Retention   | 10 years                                             | 10 years                               |

## United States

ASTM F963 is mandatory through federal law, and CPSIA sets the lead and phthalate limits. A children's product needs a Children's Product Certificate (CPC) based on testing at a CPSC-accepted third-party laboratory. The CPC is issued by the importer or the domestic manufacturer placing the product on the US market, not by the overseas factory. The toy also needs a permanent tracking label with the manufacturer or importer, production location, production date and batch. Age grading and the small-parts warning have to match the test programme.

## Canada

Canada regulates toys under the Canada Consumer Product Safety Act and the Toys Regulations, not by adopting EN 71 or ASTM F963. The requirements cover mechanical hazards, toxicological hazards and flammability. Health Canada enforces the rules and can order a recall. The importer has to hold evidence of compliance and produce it on request. Warnings and instructions must be in both English and French; a pack printed for the US is not sufficient on its own.

## Australia

The Australian Consumer Law sits behind the mandatory safety standards. AS/NZS ISO 8124 covers mechanical and physical properties, flammability and migration of elements. A separate mandatory standard applies to toys for children up to and including 36 months, and it uses a small-parts cylinder larger than the ISO one. Mandatory standards also apply to toys containing magnets and to products containing button batteries. Responsibility sits with the supplier or importer, who must be able to show records.

## Where the five markets differ most

| Question                       | EU                      | UK             | US             | Canada                  | Australia        |
|--------------------------------|-------------------------|----------------|----------------|-------------------------|------------------|
| <b>Pre-market certificate?</b> | No; CE self-declaration | No; UKCA or CE | Yes; CPC       | No                      | No               |
| <b>Bilingual labelling?</b>    | No                      | No             | No             | Yes, English and French | No               |
| <b>Importer named on pack?</b> | Yes                     | Yes            | Tracking label | Yes                     | Supplier records |
| <b>Retention</b>               | 10 years                | 10 years       | As required    | On request              | As required      |

## 12 checks before a first order

| #  | Check                      | What good looks like                                                                                                              |
|----|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------|
| 1  | Destination and age grade  | Confirm the market and the age band in writing. The age on the packaging is not a marketing decision; it sets the test programme. |
| 2  | Item identity              | Match the drawing, the sample and the test report. A report for a similar item is not evidence for this item.                     |
| 3  | Materials                  | Wood species, board, thickness, hardware and any added parts. A change of species or fixing is a new test item.                   |
| 4  | Coatings and inks          | Paint, stain, ink and any printed panel. EN 71-3 and the US/Canada/Australia element limits apply to the coating as supplied.     |
| 5  | Test report                | Issued for the exact item and material combination, from an accredited or CPSC-accepted laboratory as the market requires.        |
| 6  | Declaration or certificate | EU DoC, UK DoC or US CPC. Confirm who signs it and that the standard and importer details are correct.                            |
| 7  | Marking and artwork        | CE, UKCA or neither; where the mark goes; the size; whether it is on the product or the packaging.                                |
| 8  | Importer details           | EU or UK importer name and address, or the US tracking label. The factory cannot fill this in for you.                            |
| 9  | Warnings and language      | Age warning, small-parts warning and instructions in the language the market requires, including French for Canada.               |
| 10 | Batch traceability         | A batch or production code that links the shipped carton to the production run and the test report.                               |
| 11 | Packaging and carton marks | Retail packaging, barcode, carton marks and per-carton quantity. Confirm before printing.                                         |
| 12 | Carton and container data  | Carton size, CBM, net and gross weight, units per 20 ft and 40 ft, and the mixed-load figure.                                     |

## How to read a test report

- The product name, photo and description match the item you are buying, not a similar item in the range.
- The report date is after the last change of paint, board, hardware or supplier.
- The standards and parts are listed: EN 71-1, -2 and -3; ASTM F963; or the market-specific rule.
- The applicant and the testing laboratory are identifiable, and the laboratory is accepted for the destination market.
- The sample description matches production, including the coating and any printed panel.

## 8 questions to send the factory

1. Can you send the EN 71-1, -2 and -3 reports for this exact item, in our company name?
2. Which wood species, paint, ink and hardware are in the sample, and will production use the same?
3. Which marking route are we using (UKCA or CE), where does the mark go, and can we see the pack artwork before printing?
4. What is the carton size, CBM, gross weight and units per 20 ft and 40 ft for this item?
5. What does a mixed container of these three items load to, including the gaps between cartons?
6. What is the sample lead time, the production lead time and the sample credit policy?
7. How is the batch identified, and what traceability record comes with the shipment?
8. Which documents come with the export cartons: packing list, test report, declarations, batch record?

## Red flags in a quotation

- A container quantity that does not reconcile with the carton CBM.
- A test report for a different item, a different material, or only in the factory's name.
- A UKCA or CE claim with no named importer and no technical file.
- A carton size that changes after the order is placed.
- A mixed-load figure that simply adds up single-SKU loads.

## What we supply, and what we do not claim

We supply per-item EN 71 and ASTM F963 test reports, material and coating declarations, batch identification, carton data for 47 SKUs, and retail-ready packaging to your artwork. Our own 6,000 m<sup>2</sup> plant in Yunhe, Zhejiang, has produced wooden toys since 2007 with a team of 80. We do not claim FSC CoC, BSCI or SEDEX certification. Where a buyer needs those schemes, the factory and the buyer have to agree the audit route separately.

## What happens after you enquire

| When                  | What happens                                                                                                     |
|-----------------------|------------------------------------------------------------------------------------------------------------------|
| Day 0                 | Send item codes or drawings, quantity per item, age band and destination market.                                 |
| Within 2 working days | Quotation with carton size, CBM, gross and net weight and container loading for each item.                       |
| Day 3 to 5            | Custom items: 3D drawing and indicative price. Stock items: sample dispatched within 48 hours.                   |
| Around day 10         | Custom sample ready for approval. Changes are confirmed in writing before testing.                               |
| Around day 30         | Production complete, final inspection against the approved sample, export documents prepared for your forwarder. |

### Sources and further reading

GOV.UK: product regulations and current approaches to product marking (CE recognition continued from 1 October 2024).

EU: Toy Safety Directive 2009/48/EC and EN 71 series.

US CPSC: ASTM F963, CPSIA and the Children's Product Certificate.

Health Canada: Canada Consumer Product Safety Act and Toys Regulations.

ACCC: mandatory safety standards for toys, button batteries and magnets.

Our pages: <https://www.china-wooden-toys.com/wooden-toy-safety-standards/> |

<https://www.china-wooden-toys.com/ukca-marking-wooden-toys/> | <https://www.china-wooden-toys.com/wooden-toy-container-loading-table/>

This checklist is practical guidance, not legal advice. Check the current official guidance for your product and route to market before you place an order. Contact: [info@china-wooden-toys.com](mailto:info@china-wooden-toys.com) | <https://www.china-wooden-toys.com>