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GUIDANCE DOCUMENT No 13

ON THE APPLICATION OF DIRECTIVE 2009/48/EC ON THE SAFETY OF TOYS

Craft kits

This Guidance document is a **non-binding** document intended to provide guidelines to help Member States and stakeholders on the classification of craft kits for children. The proposals in this document are not necessarily supported by all the experts in the Expert Group on Toy Safety. However, on the whole the document reflects the general approach of the Expert Group regarding the classification of crafts kits for children. The images appearing in the document constitute examples intended to facilitate the decision-making. They do not presuppose the conformity of the represented products¹.

This Guidance document does not relieve national authorities from their obligation to determine for any individual product, on a case-by-case basis, whether it falls within the scope of application of the Toy Safety Directive 2009/48/EC or within the scope of application of other sectoral legislation. The Court of Justice of the European Union has repeatedly held that the national authorities, acting under the supervision of the courts, must proceed on a case-by-case basis, taking account of all the characteristics of the product. Therefore, this document shall not “prescribe” which regulatory framework applies. Rather, it shall serve as one out of many elements supporting the national competent authorities in their case-by-case decision on individual products. In particular, this Guidance document does not prevent a national authority from consulting with colleagues from other regulated sectors concerned in order to reach a complete view on all aspects related to a given product.

¹ The views expressed in this document are not legally binding; only the Court of Justice of the European Union can give an authoritative interpretation of Union law.

This guidance document (including its classification criteria) is not meant to affect products already placed on the market before the revised document has been published on the Europa website.

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Craft kits

1. INTRODUCTION

The Commission services have asked Member States experts on toy safety to reflect on the criteria to be used to classify craft kits for children. Based on this request the Expert Group on Toy Safety published the first version of Guidance document No 13 “Crafts” in 2011, followed by an editorial amendment in 2014.

In the meantime many new kinds of toys were developed and introduced on the European market. Therefore, it was evident that the document needed to be updated. Furthermore, Guidance document No 13 also still refers to the old Toys Safety Directive 88/378/EEC.

The Commission and Member State Authorities agreed at the ADCO Toys meeting in January 2023 to start the revision of Guidance document No13.

On the basis of the draft document made by the ADCO Working group “Guide No 13” and the contributions from the Member State experts, the Expert Group on Toy Safety adopted the new version in 2024.

Guidance document No 13 is intended to help to differentiate between craft kits with play value which should be considered as toys and craft kits for children which should be considered as products covered by the General Product Safety Directive 2001/95/EC (GPSD) or the Regulation (EU) 2023/988 on general product safety (GPSR), which shall apply from 13 December 2024.

It is not in the remit of Guidance document No 13 to deal with age classifications. During the research for the revision of the guideline, only Craft kits for children “3+” were found on the European market. In CEN ISO/TR 8124-8:2016 Safety of toys - Part 8: Age determination guidelines Craft kits are also classified as toys for older children (at least 36 months+).

As concerns the result of the crafting activity by the child, Guidance document No 13 does not cover the final/end product itself, which could be a toy, jewellery, a decorative article etc.

2. LEGAL BACKGROUND

Article 2 of the Safety of Toys Directive 2009/48/EC (TSD) defines toys as products "designed or intended, whether or not exclusively, for use in play by children under 14 years of age".

This means that, for the purpose of this guideline, a toy craft kit must comply with the requirements of the TSD. All individual parts of a toy craft kit have to be safe. Additionally the final product which is made by the child according to the instructions given by the manufacturer of the craft kit has to be safe for the child who is handling this craft kit. This requirement does not imply that such final products have to be safe for younger children as well: if the final product is – for example – a stuffed toy like a “Teddy bear” – it is attractive also for children under 3 years, but it cannot be expected that the teddy bear which is the result of the crafting activity by the child will comply with the requirements for toys for children under 3 years of age. This child-made Teddy bear itself does not fall within the scope of the TSD. Although it is the result of the handicraft, it is not to be considered as a toy that is placed on the market according to the TSD, as it was the original toy craft kit put on the market, as such, by the manufacturer.

Therefore, instructions for use and assembly must always inform supervisors that the final product is not suitable for younger children/children under 3 years of age, if this is the case.

In general, supervisors must always be aware that the final product/toy may only be suitable for certain age groups.

According to article 3, paragraphs 22, 23, 24 and 25 of the TSD, chemical toys, olfactory board games, cosmetic kits and gustative games are considered as toys and not as craft kits and therefore they are not addressed by this guidance document.

3. CRITERIA FOR THE CLASSIFICATION OF CRAFT KITS FOR CHILDREN

Criteria for classification as toys:

- The main purpose is the playful handling of different materials and tools itself
- can be combined with educational purpose
- playful learning of new skills
- imitation of adult's activities
- functional toy equipment
- low to medium skills required
- higher skills can be required depending on the recommended age (e.g. carving kit)
- tools for the crafting should be adapted to the recommended age of the children

Criteria for classification as products other than toys:



- The main purpose is to produce a homemade product without playful handling to learn a special technique of working e.g. knitting, embroidery, mosaic painting
- Not easy to handle due to the weight, the dimensions (very small beads etc.), or a combination thereof
- Professional tools
- Dexterity and fine motor skills needed
- Higher complexity



For this guideline, the following categories were used:


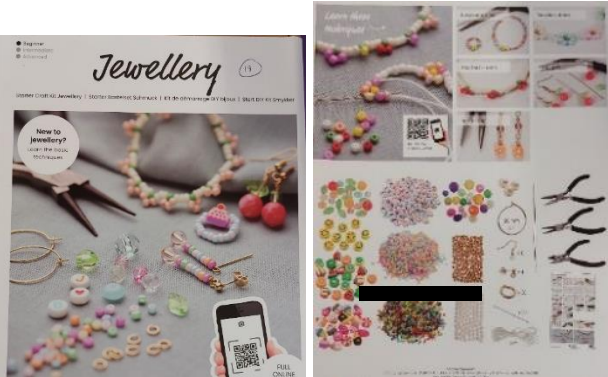
1. Final product is jewellery or similar items
2. Sewing, knitting (textiles) and similar techniques (method of creation)
3. Paper crafting (material) / mixed materials / mixed media
4. Mosaic, diamond painting and similar
5. Painting, drawing and colouring
6. Wood crafts
7. Modelling

4. PRODUCT CATEGORIES


4.1. Jewellery or similar items (final product)



No		Toy Y / N	Description	Criteria
1.		Y	<p>The kit consists of a bracelet making wheel with 3 patterns, 7 colours of silk cord, 18 charms, 18 beads, 6 epoxy stickers, 60 jump rings, 6 clasps, Coralia's complete story</p> <p>Recommended age: 7+</p> <p>End product: bracelets</p>	<p>Playful learning of new skills</p> <p>The main purpose is the playful handling of different materials</p>
2.		Y	<p>Diamond painting. Applying multi-coloured rhinestones on an adhesive canvas. Each colour has its own place marked on canvas.</p> <p>Tools needed: Diamond painting pen, canvas and rhinestones.</p> <p>End product: Bracelet</p>	<p>Playful learning of new skills</p> <p>The main purpose is the playful handling of different materials</p>



No		Toy Y / N	Description	Criteria
3.		Y	<p>Small lightweight colourful plastic beads and yarn.</p> <p>End product: bracelet or ring.</p>	<p>Playful learning of new skills</p> <p>The main purpose is the playful handling of different materials</p>
4.		Y	<p>Different plastic beads which will be easily built on a cord</p> <p>End product: necklace, bracelet</p>	<p>Playful learning of new skills</p> <p>The main purpose is the playful handling of different materials</p>


No		Toy Y / N	Description	Criteria
5.		N	<p>Friendship bracelets: knotting kit contains yarn in 6 colours and beads for decoration. Detailed instructions included.</p>	<p>Dexterity and fine motor skills needed</p> <p>The main purpose is to produce a home-made product without playful handling to learn a special technique of working, in this case knotting</p>
6.		N	<p>Small lightweight colourful plastic beads and metal yarn / earring hook . The tongs are included in the package.</p> <p>End product: bracelet, ring or earring</p>	<p>Needs special skills and tools to craft.</p>

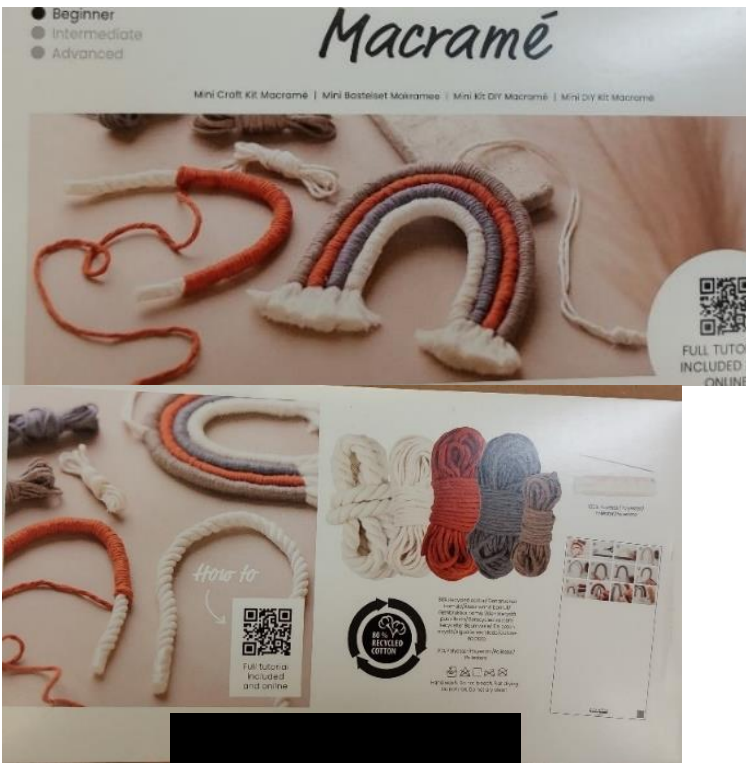
4.2. Sewing, knitting (textiles) and similar techniques (method of creation)


No		Toy Y / N	Description	Criteria
7.	 <p>The image shows a wooden box for a sewing kit titled "BASTELBOX MONSTER NÄHEN" with an age recommendation of 8+. The box features a blue monster illustration and various sewing tools. Below the box is an instruction booklet titled "MONSTER NÄHEN" with a table of contents and a list of materials.</p>	Y	<p>With this creative set, everyone can make his own personal favorite monster. For this, the basic techniques of sewing and the various design options are explained in detail in the instruction booklet. In this way, completely individual monster friends are created from the variety of included fabrics and materials, to play with, love or give away.</p>	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>Playful learning of new skills</p> <p>Imitation of adult's activities</p> <p>Functional, educational toy</p>


No		Toy Y / N	Description	Criteria
8.		Y	Pompom materials: yarn and pipe cleaner.	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>Playful learning of new skills</p> <p>Imitation of adult's activities</p> <p>Easy to handle, no special skills needed.</p>
9.		Y	Flower materials: paper and yarn (sewing picture)	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>Playful learning of new skills</p> <p>Imitation of adult's activities</p> <p>Easy to handle, no special skills needed.</p>


No		Toy Y / N	Description	Criteria
10.		Y	Ready-made wooden character and yarn for easy weaving	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>Playful learning of new skills</p> <p>Easy to handle, no special skills needed.</p>
11.		Y	Set containing easy to handle mechanism to create woven bracelets as an end product. Brightly coloured components and materials, designed and marketed as a toy	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>Playful learning of new skills</p> <p>Easy to handle, no special skills needed.</p> <p>Does not correspond to adult craft/ activity</p>



No		Toy Y / N	Description	Criteria
14.		N	<p>Knitting is a method for production of textile fabrics by interlacing yarn loops with loops of the same or other yarns.</p>	<p>The main purpose is to produce a home-made product without playful handling to learn a special technique of working e.g. in this case knitting techniques. Not easy to handle due to the weight, the dimensions, or a combination thereof.</p> <p>Dexterity and fine motor skills needed</p>

No		Toy Y / N	Description	Criteria
15.	 <p>● Beginner ● Intermediate ● Advanced</p> <p><i>Macramé</i></p> <p>Mini Craft Kit Macramé Mini Bostelset Macramé Mini Kit DIY Macramé Mini DIY Kit Macramé</p> <p>FULL TUTORIAL INCLUDED ONLINE</p> <p>How to</p> <p>Full tutorial included and online</p> <p>RECYCLED COTTON</p>	N	Macramé is a form of textile produced using knotting techniques.	<p>The main purpose is to produce a home-made product without playful handling to learn a special technique of working e.g. in this case knotting techniques (Macramé)</p> <p>Dexterity and fine motor skills needed</p>



No		Toy Y / N	Description	Criteria
17.		Y	<p>Crochet is a creative craft that involves sculpting shapes and figures using wool and special crochet needles.</p> <p>End product may be playable figure (toy) or anything else</p>	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>Playful learning of new skills</p> <p>Imitation of adult's activities</p> <p>Functional, educational toy</p>


No		Toy Y / N	Description	Criteria
18.		N	<p>Crochet is a process of creating textiles by using a crochet hook to interlock loops of yarn, thread, or strands of other materials</p>	<p>The main purpose is to produce a home-made product without playful handling to learn a special technique of working e.g. in this case crochet</p> <p>Dexterity and fine motor skills needed</p>



No		Toy Y / N	Description	Criteria
19.		Y	Weaving is a creative craft that involves bracelets of wool.	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>Playful learning of new skills</p> <p>Imitation of adult´s activities</p> <p>Functional, educational toy</p>



No		Toy Y / N	Description	Criteria
20.	 <p>The image shows a collage of weaving-related items. On the left, a wooden loom is partially visible with threads. In the center, a smartphone displays a QR code. On the right, a collection of colorful threads (red, orange, yellow, green) is laid out, along with a wooden comb and a small woven sample. Above the threads, there are four small diagrams illustrating basic weaving techniques, labeled 1, 2, 3, and 4. The top left corner features a brown card with the text 'discover your creativity with Weaving'.</p>	N	<p>Weaving is a method of textile production in which two distinct sets of yarns or threads are interlaced at right angles to form a fabric</p>	<p>The main purpose is to produce a home-made product without playful handling to learn a special technique of working e.g. in this case weaving</p> <p>Dexterity and fine motor skills needed</p>
21.	 <p>The image shows a collage of embroidery-related items. On the left, a circular embroidery hoop with a green fabric and a floral design is displayed. In the center, a smartphone displays a QR code. On the right, a collection of colorful threads (red, orange, yellow, green) is laid out, along with a wooden hoop and a small embroidered sample. Above the threads, there are four small diagrams illustrating basic embroidery techniques, labeled 1, 2, 3, and 4. The top left corner features a brown card with the text 'Embroidery'.</p>	N	<p>Embroidery is the craft of decorating fabric or other materials using a needle to apply thread or yarn.</p>	<p>The main purpose is to produce a home-made product without playful handling to learn a special technique of working e.g. in this case embroidery</p> <p>Dexterity and fine motor skills needed</p>



4.3. Paper Crafting and mixed materials / mixed media


No		Toy Y / N	Description	Criteria
22.		Y	Decorated paper roll (recycled) to make shadow pictures.	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>Can be combined with educational purpose</p> <p>no special skills needed</p>
23.		Y	Soft crown that can be decorated with sticker diamonds.	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>No special skills needed</p>

No		Toy Y / N	Description	Criteria
25.		Y	<p>The extensively illustrated instructions explain to children aged 8 and up how to use the handy saw properly and provide valuable tips for working with felt wool, pompoms, paint, chenille wire and other crafting utensils.</p>	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>Can be combined with educational purpose</p> <p>Functional, educational toy</p>



No		Toy Y / N	Description	Criteria
26.		Y	<p>The corn pieces are supposed to be wettened and then stick together in different forms and figures according to examples contained in the set.</p>	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>No special skills needed.</p>
27.		Y	<p>Kit of different crafting materials; paper, pens, clay, stickers etc.</p> <p>Includes scissors with blunt end.</p>	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>Can be combined with educational purpose</p> <p>No special skills needed</p>



No		Toy Y / N	Description	Criteria
28.		Y	<p>Kit for making flowers with pearls, small ready make pompoms and pipe cleaner.</p>	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>Can be combined with educational purpose</p> <p>No special skills needed</p>
29.		Y	<p>Shrink plastic is a method where a drawn or coloured plastic picture is shrunk in high temperature (eg. in oven).</p>	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>Can be combined with educational purpose</p> <p>Needs adult help for using oven or other hot element, but otherwise no special skills needed</p>



No		Toy Y / N	Description	Criteria
30.		N	Wooden photoframe that can be decorated with stickers, pearls and clay.	The main purpose is to produce a home-made product without playful handling to learn a special technique of working
31.		Y	Decorated carton with paper yarns and thread to sew. Almost like sewing picture.	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>No special skills needed</p>


No		Toy Y / N	Description	Criteria
32.		N	Fine paper art flowers.	<p>The main purpose is to produce a home-made product without playful handling to learn a special technique of working</p> <p>Not easy to handle due to the fine and delicate parts</p> <p>Dexterity and fine motor skills needed</p>

4.4. Mosaic, diamond painting and similar



No		Toy Y / N	Description	Criteria
33.		Y	<p>Diamond painting. Applying multi-coloured rhinestones on an adhesive canvas. Each colour has its own place marked on canvas.</p> <p>Tools needed: Diamond painting pen and rhinestones.</p> <p>End product: decorated stone.</p>	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>No special skills needed</p>
34.		Y	<p>Diamond painting. Applying multi-coloured rhinestones on an adhesive canvas. Each colour has its own place marked on canvas.</p> <p>Tools needed: Diamond painting pen, canvas and rhinestones.</p> <p>End product: Bracelet or small pictures.</p>	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>No special skills needed</p>



No		Toy Y / N	Description	Criteria
35.		N	<p>Diamond painting. Applying multi-coloured rhinestones on a adhesive canvas. Each colour has its own place marked on canvas.</p> <p>Tools needed: Diamond painting pen, canvas and rhinestones.</p> <p>End product: large picture/canvas.</p>	<p>The main purpose is to produce a home-made product without playful handling to learn a special technique of working</p> <p>Not easy to handle due to the fine and delicate parts</p> <p>Dexterity and fine motor skills needed</p> <p>More professional than the toy version</p>
36.		Y	<p>Set of 1500 beads in different colours and with different structure, a template, a small spray bottle and some additional accessories.</p> <p>Children can create figures/pattern when placing the beads on the template. To fix these figures/pattern children have to spray water on them and let them dry.</p>	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>No special skills needed</p>

No		Toy Y / N	Description	Criteria
37.		Y	<p>Set of 1200 beads in different colours and a template (pegboard).</p> <p>Children can create figures/pattern when placing the beads on the template. To fix these figures/pattern it is necessary to iron them. The instruction clearly says: “The ironing must be made by an adult”.</p>	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>No special skills needed</p>
38.		Y	<p>Mosaic picture consisting of about 400 pieces of soft foam like material on adhesive template</p>	<p>Limited number of pieces</p> <p>Child appealing motive incl. a template</p> <p>Foam pieces instead of stone pieces</p>

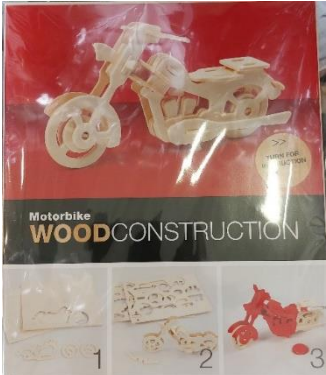

No		Toy Y / N	Description	Criteria
39.		N	<p>Around 1500 small ceramic mosaic stones (5*5*3 mm) must first be dipped in water and then glued onto a template. Ceramic stones that do not fit have to be cutted in the needed form.</p>	<p>Not easy to handle Fine motor skills needed Professional tools needed eg. tweezers</p>


4.5. Painting, drawing and colouring

No		Toy Y / N	Description	Criteria
40.		Y	<p>Ready-made blank textile product which can be drawn or coloured</p> <p>Including the pens.</p>	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>Playful learning of new skills</p> <p>Easy to handle, no special skills needed.</p>
41.		Y	<p>Ready-made blank paper product which can be coloured.</p> <p>Including the pens.</p>	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>No special skills needed</p>



No		Toy Y / N	Description	Criteria
42.		Y	<p>Paper product which can be cut, glued and coloured.</p> <p>Including the pens.</p>	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>No special skills needed</p>
43.		Y	<p>Paper product which can be cut, glued and coloured. Can also include recycled materials as empty milk carton/pack.</p> <p>Including the pens.</p>	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>No special skills needed</p>



4.6. Wood crafts

No		Toy Y / N	Description	Criteria
44.	 	Y	<p>Wooden construction</p> <p>Includes ready-sawn shapes to put together.</p>	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>No special skills needed since the parts are ready-sawn and just need to be put together</p>

<p>45.</p>		<p>N</p>	<p>Woodwork Includes ready-sawn shapes that needs clue and nails to put together. Hammer not included.</p>	<p>The main purpose is to produce a home-made product without playful handling to learn a special technique of working e.g. Not easy to handle Needs additional professional tools such as a hammer Dexterity and fine motor skills needed</p>
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4.7. Modelling

No		Toy Y / N	Description	Criteria
46.		Y	<p>Clay and separate eyes to craft animals. End product may be playable figure (toy) or anything else</p>	<p>The main purpose is the playful handling of different materials and tools itself No special skills needed</p>
47.		Y	<p>Clay and rings to craft different shape key- rings. End product may be playable figure (toy) or anything else</p>	<p>The main purpose is the playful handling of different materials and tools itself No special skills needed</p>

No		Toy Y / N	Description	Criteria
48.		Y	<p>Different type of clays for crafting figures.</p> <p>End product may be playable figure (toy) or anything else</p>	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>No special skills needed</p>
49.		Y	<p>Kit for making Christmas decoration.</p> <p>The final product is not a toy.</p>	<p>The main purpose is the playful handling of different materials and tools itself</p> <p>No special skills needed</p>