

GUIDANCE DOCUMENT No 20
ON THE APPLICATION OF
DIRECTIVE 2009/48/EC ON THE SAFETY OF TOYS
Decorative products and products for collectors

This Guidance document is a non-binding document intended to provide guidelines to help Member States and stakeholders making the distinction between toys and other consumer products. It expresses the views of the majority of members in the Expert Group on Toy Safety¹.

The images appearing in the document constitute examples intended to facilitate the decision-making. They do not presuppose the conformity of the represented products.

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.

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.

1. Background

According to Article 2 (Scope) of the Toy Safety Directive 2009/48/EC (TSD) the Directive shall apply to products designed or intended, whether or not exclusively, for use in play by children under 14 years of age (‘toys’).

According to Annex I ‘List of products that, in particular, are not considered as toys within the meaning of this Directive’, inter alia the following products are not considered as toys:

- Decorative objects for festivities and celebrations;

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.

- Products for collectors, provided that the product or its packaging bears a visible and legible indication that it is intended for collectors of 14 years of age and above. Examples of this category can be found in section 4.

Manufacturers are responsible for the correct classification of a product before placing it on the market.

Within the scope of this guidance document, decorative products and products for collectors can be divided into two categories:

- Decorative products and products for collectors which are toys and have a double function;
- Decorative product and products for collectors which are not toys but can be confused with toys.

For the purpose of this guidance document the definition of decorative products and products for collectors also includes dolls for adult collectors² and products consisting of miniatures to be assembled and their supporting products. Previous Guidance Document No 5 on criteria to classify products consisting of miniatures to be assembled and painted and their supporting products and previous Guidance Document No 6 on criteria for differentiating dolls for adult collectors from toys have been incorporated into this guidance document and have become disused as of the date of publication of this guidance document.

Products which are clearly just decorative products/products for adult collectors or which are clearly just toys are not covered by this guidance document.

2. How to classify a product?

The definition in Article 2 (1) of the TSD provides the following criteria for deciding whether a product falls under the scope or not:

- Any product designed or intended
- whether or not exclusively
- for use in play
- by children under 14 years of age.

The words ‘whether or not exclusively’ indicate that the product does not have to be exclusively intended for playing purposes in order for it to be considered as a toy, but it can have other functions as well (double function). For further reference see the TSD explanatory guidance document.³

The main difficulty of this definition is the concept of ‘use in play’ or ‘playing value’. Virtually everything has a playing value for a child, but this does not make every object fall into the definition of toy. To be considered as a toy for the purpose of the Directive, the playing value has to be introduced in an intended way by the manufacturer.

The declaration by the manufacturer of the intended use is a criterion to be considered. However, the reasonably foreseeable use shall prevail over the declaration of intended use by

² Within the meaning of this guidance document products for adult collectors are considered as products for collectors above the age of 14 years.

³ <http://ec.europa.eu/growth/sectors/toys/safety/guidance>

the manufacturer. If the manufacturer labels products as not being toys, he has to be able to support this claim.

Besides this, the following indicative criteria could be considered to decide (see also guidance document No 4: Grey zone problem) if a product should be classified as a toy or not:

- Way of advertising/target audience (e.g. labelling clearly stating that they are intended to be used by adult collectors, labelling indicating the age of the intended user/recommended ages of user, e.g. “over 14 years”);
- Pictures on the packaging;
- Markings on the product/on the packaging;
- Place of selling (e.g. products sold in shops, including online marketplaces, specialised in the sale of collectors’ items, decorative products and/or hobby shops as well as at thematic events);
- Size and weight;
- Price;
- Kind/size of clothing (e.g. normal, traditional, removable);
- The details: special details of the product, e.g.: the quality of the materials, a pedestal, the degree of details, design, complexity of the product (skills’ levels required⁴), etc.
- The extent to which the product can be confused with a toy;
- The foreseeable use of the product by children under 14 years for playing.

If a product is classified as a decorative product or product for adult collectors by the annexes to this document and a manufacturer would classify the same product as a toy, he has to be able to support this claim. This should be done in the technical documentation, e.g. in the description of the intended and foreseeable use. More information can be found in part 3.1 of the Technical documentation guidance document⁵.

However it goes against the TSD if a manufacturer marks a product with ‘This is not a toy’ and therefore does not classify it as a toy, although the annexes to this document suggest that it is to be classified as a toy.

3. Decorative products

Based on the TSD explanatory guidance document⁶, the category ‘Decorative objects for festivities and celebrations’ includes a variety of decorative objects, for example for Christmas or birthdays. They can be child appealing, such as a decorative Santa Claus for Christmas. Nevertheless, a child appealing decorative product which is not considered as a toy still needs to be safe including for children in accordance with the provisions of the General Product Safety Directive 2001/95/EC (GPSD).⁷

⁴ If skill levels are specified by the manufacturer, only skill levels of the same manufacturer can be compared with each other to determine the complexity of the product, which is an important criterium to classify it as a toy or not. Skill levels from different manufacturers cannot be compared with each other.

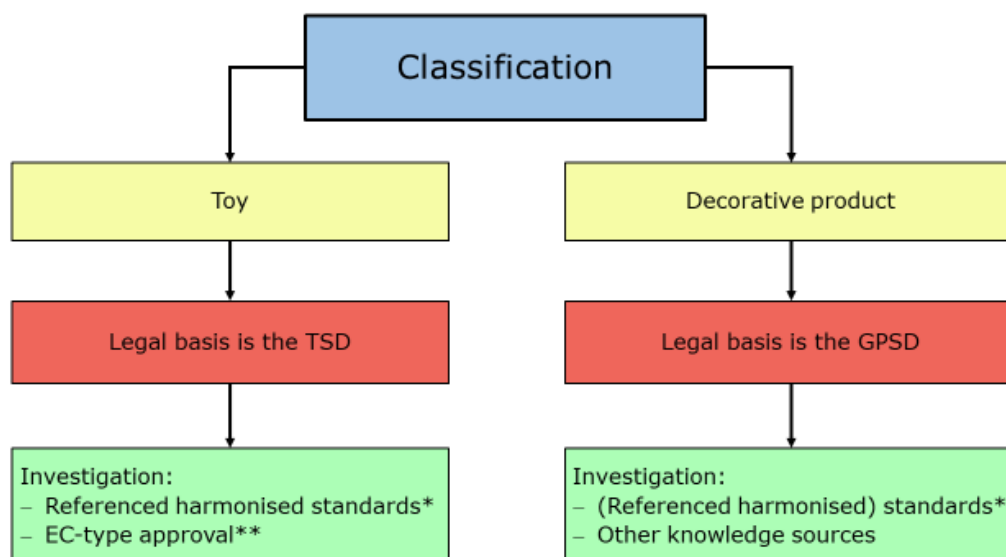
⁵ <https://ec.europa.eu/docsroom/documents/17190> Section 3.1, p. 20.

⁶ <https://ec.europa.eu/docsroom/documents/48114>

⁷ GPSD will be repealed as of 13/12/2024 by the new General product Safety Regulation (GPSR) available at [EUR-Lex - 32023R0988 - EN - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu/eur-lex.do?uri=CELEX:32023R0988:EN:EUR-Lex)

There are many different kinds of decorative products, e.g. for festivities and celebrations such as birthday parties, Christmas, Easter, European/World championship sports events. Other decorative products (not specific for festivities and celebrations) are for example products for the children's room, souvenirs or gadgets. These products should be classified on a case by case basis.

For examples see annexes 1 to 5.



* A harmonised standard is a European standard developed by a recognised European Standards Organisation (CEN, CENELEC, or ETSI) following a request from the European Commission to one of these organisations. Manufacturers, other economic operators, or conformity assessment bodies can use harmonised standards to demonstrate that products, services, or processes comply with relevant EU legislation. The references of harmonised standards must be published in the *Official Journal of the European Union*.

** Internal production control based on the manufacturer's own responsibility for the conformity assessment has proven adequate in cases where it has followed the harmonised standards, the references of which has been published in the *Official Journal of the European Union*, covering all the safety requirements for the toy.

In cases where such harmonised standards do not exist, the toy should be submitted to third party verification, in this case EC-type examination. The same should apply if one or more such standards have been published with a restriction in the *Official Journal of the European Union*, or if the manufacturer has not followed such standards completely, or only in part. The manufacturer should submit the toy to EC-type examination in cases where it considers that the nature, design, construction or purpose of the toy necessitates third party verification.

In case of child appealing decorative products the standards for toys or parts of them may be used to ensure their safety if no specific standards for these products exist.

Manufacturers are often selling products with a play value as decorative products. An example is the plush bear which is dressed as Santa Claus, which is considered as a toy in Guidance document No 11.⁸

4. Products for collectors

According to Annex 1 of the TSD the following are not considered as toys: Products for collectors, provided that the product or its packaging bears a visible and legible indication that it is intended for collectors of 14 years of age and above.

⁸ https://single-market-economy.ec.europa.eu/sectors/toys/toy-safety/guidance_en

Examples of this category are:

- a) detailed and faithful scale models.
- b) kits for the assembly of detailed scale models.
- c) folk dolls and decorative dolls and other similar articles.
- d) historical replicas of toys.
- e) reproductions of real firearms.

In this guidance document, specific criteria are given to make a distinction between toys and products which should be regarded as products for collectors of 14 years of age and above ('adults'). These products for adults can also be considered as a kind of decorative product.

For examples see Annex 6.

As concerns the classification, products in Annex 6 Part B which are detailed and faithful scale models (TSD Appendix 1, No. 2 (a) and (b)) could potentially be excluded by the manufacturer from the scope of the Toy Safety Directive scope if they were marked for +14 years of age.

4.1 Support products sold in combination with toys consisting in miniatures to be assembled and in combination with toys consisting in miniatures to be assembled and painted

Definition of support products

Support products are any product or material sold specifically for producing or being incorporated on the toy, e.g. parts for producing tiny plastic figures, glues, colour paints, varnishes, etc.

Classification of support products

The products or materials that are sold specifically for producing or being incorporated on the toy shall be considered as part of the toy and therefore must comply with the safety requirements of the TSD.

This applies both to:

- products sold together with the toy
- products sold separately, but labelled as to be used for assembling or painting the toy.

The manufacturers should recommend support products that comply with the TSD, when the support products are sold separately.

In case of toys intended to be assembled and/or painted by children⁹ (e.g. figures to be assembled and painted, model plastic kits, etc) the support products provide a significant part of the play value of the toy. The support products are clearly intended for use in play by children (Article 2 (1) of TSD) and must be considered as part of the toy. Therefore, the safety requirements of the TSD must apply also to each unit of the support products.

⁹ A different problem are the toys that have to be assembled before they can provide play value (e.g. garden swings and ride-on toys). In this case, the support products do not provide play value and cannot be considered as toys. However, they are part of the toy that a child will play with and might be hazardous if they are not assembled properly. The European Standard 71-1:2014+A1:2018 clause 4.2 established the safety requirements that could be applied for toys intended to be assembled by a child or by an adult.

5. Annexes

This document contains several annexes which treat different product categories relating to decoration, festivities or collector products. They are divided as follows:

Annex 1: Dolls, animals, figures.

Annex 2: Decorations for interior design.

Annex 3: Souvenirs.

Annex 4: Party novelties for celebrations / parties.

Annex 5: Other, various and dual use.

Annex 6: Products for adult collectors.

Part A: Detailed and faithful scale models;

Part B: Miniatures to be assembled

Part C: Folk dolls and decorative dolls and other similar articles.

6. Other (guidance) documents

On the following website, you can find the guidance documents related to toy safety:
<http://ec.europa.eu/growth/sectors/toys/safety/guidance>.

- Guidance document No 4: Grey zone problem: Is a specific product covered by the Toy Safety Directive 2009/48/EC or not?
- Guidance document No 11: Guidance document on the classification of toys intended for children under 36 months of age or of 36 months and above.
- TSD Explanatory guidance document.

Some other guidance documents:

- Atlas to uniformly recognise household appliances with child appealing designs. See scope of the Atlas and
<https://ec.europa.eu/docsroom/documents/8712?locale=en>.
- Atlas to uniformly discriminate between portable luminaries for children and adults. See scope of the Atlas and
<https://ec.europa.eu/docsroom/documents/8772/attachments/1/translations>
- CEN ISO/TR 8124-8:2014 Safety of toys - Part 8: Age determination guidelines
- CPSC (US Consumer Product Safety Commission), Age determination guidelines: Relating Children's Ages To Toy Characteristics and Play Behaviour
https://www.cpsc.gov/s3fs-public/pdfs/blk_media_adg.pdf




Annex 1. Dolls, animals, figures


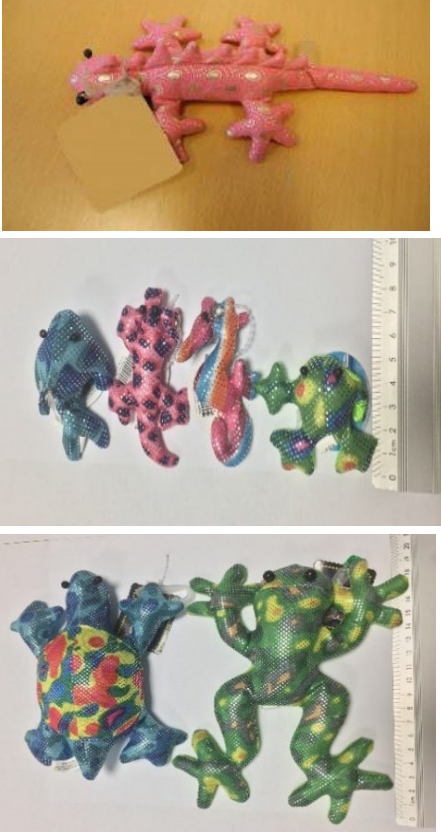

Criteria for classification as toys:





- 3D shaped.
- (Partly) soft filled.
- (Partly) for cuddling.
- Easy to handle




Criteria for classification as products other than toys:

- Product is completely or mainly made of hard and easily breakable material (e.g. porcelain, glass).
- Low play value.
- 2D shaped.
- Not easy to handle due to the weight, the dimensions, or a combination thereof.

Dolls, animals, figures	Toy or not	Description of product	Criteria
	YES	Napkin holder. Product is a soft filled toy, metal wires in the arms (3D and soft).	3D shaped. Size 10 – 15 cm. Soft toy with movable arms. Play value.
	YES	Soft filled toy with audio speaker.	This toy can be marketed with or without a cable. Soft filled toy. Play value.
	YES	Animal or human figure partly filled with sand and soft material (fuzz). Rope on top for hanging e.g. in a tree.	Soft products which can be Christmas decorations. Height about 10 - 15 cm. 3D shaped. Lightweight (circa 100 g). Easy to handle. Filled with soft material (e.g. fuzz) and high-density materials (e.g. sand) whereby it can stand upright on his own. Play value.

	YES	Baby teeth mouse.	Product is a soft filled toy. Size 12,5 cm tall. Play value.
	YES	Toy filled with sand or other filling material.	Product (completely) filled with sand. Product is soft. Easy to handle due to the size (5 – 20 cm) and weight (15 – 500 g). Play value.
	YES	Rabbit with purse.	Product is a soft filled toy 3D shaped. Size 10 – 15 cm. Play value.

  	NO	Product ballasted with sand.	<p>Product (partly/completely) filled with sand.</p> <p>The body is hard due to the rate of filling or armature is made of metal.</p> <p>They are heavy and big (approximately 40 – 50 cm tall).</p> <p>Not easy to handle due to the weight (circa 1,5 kg).</p> <p>Not for cuddling.</p> <p>Low/no play value.</p>
	NO	Bookend, doorstopper, paper weight	<p>The body is rather hard (leather (look)).</p> <p>Product (completely) filled with sand.</p> <p>Not easy to handle due to the size (small animal approximately 11x17x26 cm) and weight (approximately 1,5 kg).</p> <p>Not for cuddling.</p> <p>Low/no play value.</p>

 	NO	Easter decoration.	<p>Product consists of iron wires and textile, without filling.</p> <p>Not for cuddling.</p> <p>Details basic and rough.</p> <p>Easter decorations on tables, bookshelves, windows, etc.</p> <p>Low/no play value.</p>
	NO	<p>Doll</p> <p>Head, hands and feet are made of wood, cap made of textile.</p> <p>Rope on top for hanging.</p> <p>Legs and arms made of wire.</p>	<p>Body is flat, made of felt.</p> <p>Size is very small, about 8 cm.</p> <p>Cannot stand on its own.</p> <p>Not for cuddling.</p> <p>Sold in a bookstore together with wrapping paper and congratulation cards as a little gift with labelling like 'Good Luck' or 'Get well soon' or 'Sleep well' etc. (as a kind of decorative product for gifts and/or a kind of lucky charm).</p> <p>Low play value.</p>




Annex 2. Products for interior decoration





Criteria for classification as toys:

- Play value.
- Removable/Reusable: intended to be put on and taken off by children.





Criteria for classification as products other than toys:




- Permanent fixed to, e.g. wall, bed, door.
- No play value.

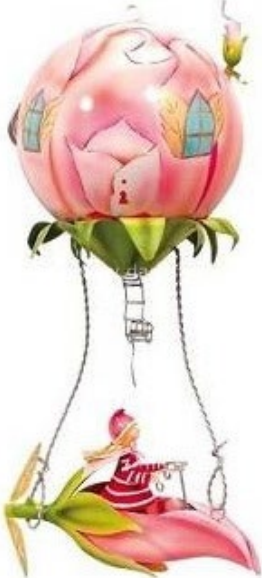
Products for interior decoration	Toy or not	Description of product	Criteria
	YES	Reusable / removable stickers.	E.g. plastic stickers for placing on windows. Play value.
	YES	Reusable / removable stickers. Often puffy, but not always.	Stickers that can be affixed and then peeled off again by children, for example on special surfaces like coated paper, plastic or glass. Play value.
	YES	Pillow in the form of animal. Product has additional features like a tail, fins.	Soft filled toy. Size: 40-200 cm. Lightweight. Shape of an animal. For cuddling. Play value.

 	YES	Jumping Jack.	<p>Jumping Jack is a toy even in the shape of a Santa Claus.</p> <p>Play value.</p>
 	YES	<p>Art and craft.</p> <p>Easter bunnies.</p> <p>Material bunnies: foam rubber.</p> <p>Dress material: paper.</p> <p>Cords: textile.</p>	<p>Easter bunnies that can be dressed up.</p> <p>Product has a double function: art and craft material (toy) and a decorative function during Easter.</p> <p>Play value.</p> <p><i>See also Guidance document 13 on crafts.</i></p>

	YES	Christmas bear with stocking.	3D shaped. Height approx. 60 cm. Cuddling. Soft filled / plush head + paws bear. Play value.
	YES	Musical mobile. Music box with a self-retraction mechanisms (child has to pull the middle cord). Movement of the feather as the music plays.	Soft musical-activity toy to hang within the reach of a child over / in the child's cot / bed / playpen. Size: Two different sizes approx. 10 cm in diameter and approx. 20 cm. Play value in the form of music and rustle in the feathers when touched by the child. Can be operated by the child. Play value.
	YES	Toy attached to a spring. Very colored, long legs. Spring can be taken off the toy.	Within the reach of the child. <i>See guidance document 4 concerning within the reach or not.</i> Animals (hard body but soft textile coat) attached to a spiral spring. Toy is sold together / separately from the spring. Play value.
	NO	Christmas / Santa Claus stocking. Intended to put gifts in.	Stocking is considered as Christmas decoration. 2D shaped. Low/no play value.

	NO	<p>Doll / Decorative object for Christmas.</p> <p>Advent calendar made of polyester fleece.</p> <p>Wall decoration.</p>	<p>Body is flat, not flexible.</p> <p>Dimensions large (e.g. 0,5 m x 0,5 m).</p> <p>Only head is 3D shaped.</p> <p>Not easy to handle.</p> <p>Low/no play value.</p>
	NO	<p>Decorative / poster.</p> <p>Made of paper.</p> <p>The clips and cards are permanently attached to the product.</p>	<p>Product is flat.</p> <p>The position of the round cards with names or, e.g. photos are not removable and cannot change position.</p> <p>No play value.</p>
	NO	<p>Decorative / photo- montage</p> <p>Photo frame.</p> <p>The rings and hearts are permanently attached to the product.</p> <p>You can insert photos into the hearts.</p>	<p>Product is flat.</p> <p>Product can stand on, e.g. a table.</p> <p>It is difficult to change the pictures.</p> <p>No play value.</p>
	NO	<p>Glow in the Dark.</p> <p>Made of fluorescent material.</p>	<p>Product is flat.</p> <p>Single piece.</p> <p>Permanently fixed by adults.</p> <p>(Aid for children) Finding the lighting switch / not completely dark in the room.</p> <p>No play value.</p>

	NO	<p>Snow globes</p> <p>Made of glass</p>	<p>Child appealing souvenir, but low play value</p> <p>Breakable material (glass)</p>
	NO	<p>Pillow with childish design.</p>	<p>Round shape (not in the shape of an animal, body, no arms, no head or other details).</p> <p>Size: 30 cm Ø.</p> <p>Plain soft filled pillow.</p> <p>Low/no play value.</p> <p><i>See also Guidance document 11 on the classification of toys intended for children under 3 years of age.</i></p>
	NO	<p>Decorative product.</p> <p>Letter made of wood, with a bear on it.</p>	<p>Sold separately (only one letter in one package).</p> <p>Height: ca. 8 cm.</p> <p>Normally the letters are permanently fixed by adults on the door, on the bed, on the wall etc.</p> <p>No play value.</p>

	NO	<p>Hanging decoration</p> <p>Textile product, no lamp.</p>	<p>Not a mobile.</p> <p>Dimensions about 25 cm length.</p> <p>To hang at the ceiling out of the reach of children, with one cord, so it can be turned around.</p> <p>Product does not turn by itself, produces no sound.</p> <p>No play value.</p>
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Annex 3. Souvenirs

Criteria for classification as toys:

- Designed for children.
- Movable arms
- Soft filled

Criteria for classification as products other than toys:

- Fragile materials, e.g. glass.
- Attractive to adults.
- Relation to the place visited.
- Detailed.

Souvenirs	Toy or not	Description of product	Criteria
	YES	Souvenir / plush toy.	Two suction cups at the end of the soft arms for attaching it at, e.g. a car window within the reach of a child. Body made of hard plastic, covered with plush (looks like plush). Height about 10 cm. Play value.
	NO	Doll / souvenir. Legs and arms not moveable.	Figure dressed in a traditional costume. Height about 10 cm. Material: hard, fragile. Sold in a souvenir shop. Not possible to (un)dress. Low play value.

Annex 4. Party novelties for celebrations / parties

Criteria for classification as toys:


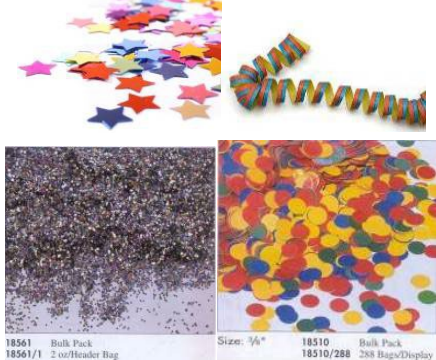

- Play value (similar to disguise costumes).
- Possible use like similar toys (for example birthday train can be used like a toy train if the wheels can turn).
- Role play.




Criteria for classification as products other than toys:





- Only for decoration, e.g. garlands fixed on the ceiling / out of children's reach.

[illegible]

 <p>EYE MASKS WITH PLASTIC NOSES</p> <p>1224 Bulk Pack 1225 Bulk Pack 1222 Bulk Pack 1221 Bulk Pack</p>	YES	Flexible glasses. Frames with plastic noses.	Part of a disguise costume. Not only for celebration. Play value.
 <p>HOLOGRAPHIC EYE MASKS</p> <p>1270 Bulk Pack 1270/6 12 PolyBag 1270/12 12 PolyBags</p>	YES	Eye masks.	Part of a disguise costume. Not only for celebration. Play value.
	YES	Birthday train for decoration on the table. Material wood.	Train is a traditional toy. Wheels can move. Additional element such as numbers or letters that can be moved between the different wagons. Play value
	NO	Piñatas. Made of paper. Decorative object for celebration.	When hit by a stick the product is destroyed. For celebration only. No play value.

	NO	<p>(Paper) Party hats.</p> <p>Party novelties.</p> <p>Material elastic band, head made of paper or cardboard.</p>	<p>Only used for celebrations (e.g. birthday party), not for role play.</p> <p>No play value.</p>
	NO	<p>Lanterns and garlands.</p>	<p>Only for festivities and celebrations.</p> <p>No play value.</p>
	NO	<p>Streamers, confetti, serpentines.</p>	<p>Only used at parties, celebrations, festivities.</p> <p>Can be used only once.</p> <p>No play value.</p>
	NO	<p>Party popper</p> <p>It emits a loud popping noise by means of a small explosive charge or compressed air that is emitted by pulling e.g. a string.</p> <p>The charge or compressed air blows out</p>	<p>Only used for parties, festivities and celebrations.</p> <p>Can be used only once.</p> <p>No play value.</p>

		<p>some confetti or streamers.</p>	
	<p>NO</p>	<p>Pistol for party popper.</p>	<p>Can only be used with the above mentioned party poppers which contain a small amount of gun powder.</p> <p>Cannot be used with other projectiles.</p> <p>Projectiles can be bought separately (refill package).</p> <p>Annex I of the TSD does not consider “fireworks including percussion caps which are not specifically designed for toys” as toys.</p>
	<p>NO</p>	<p>Party streamer.</p>	<p>Only used for parties, festivities and celebrations.</p> <p>Aerosols producing sticky strings that people use during parties.</p> <p>Gas under pressure.</p> <p>No play value.</p>

	NO	<p>Birthday train for decoration on birthday cake.</p> <p>Often made of plastic.</p>	<p>Wheels are fixed and cannot move.</p> <p>Intended to be light holders.</p> <p>Often used only once.</p> <p>Not expensive.</p> <p>Low/no play value.</p>
	NO	Plates and glasses/mugs.	<p>Only for eating.</p> <p>Only for celebrations depending on the decoration (print).</p> <p>No play value.</p>
	NO	<p>Balloon made of foil in the shape of numbers or letters.</p> <p>Material foil (not latex).</p>	<p>Balloon mainly for decoration.</p> <p>Size: numbers over 80 cm, letters around 35 cm.</p> <p>Difficult to hold for young children.</p> <p>No play value.</p>
	YES	<p>Balloons made of foil, in the shape of animals or other child appealing characters with play value.</p> <p>Made of foil (not latex).</p>	<p>Child attractive, invites to play.</p> <p>Play value.</p>

Annex 5. Other, various and dual use products




In general the criteria of Guidance document No 4 are applicable.


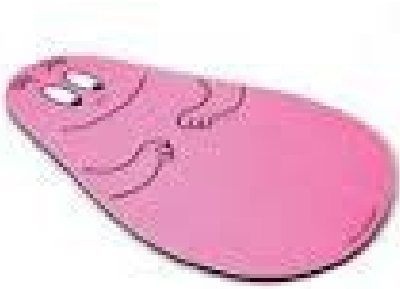

Criterion for classification as toys:

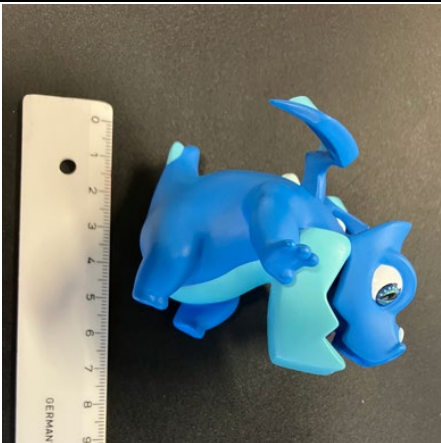


- 3D shaped
- Play value

Criterion for classification as products other than toys:

- 2D shaped
- No/Low play value

Other/various/double function	Toy or not	Description of product	Criteria
	YES	Magnets / puzzle for e.g. refrigerators.	2D or 3D shaped. Play value.
	YES	Magnets for e.g. refrigerators.	3D shaped. Play value
	YES	Panda bear attached to a key ring. Material hard.	Animal, doll or other figure attached to a key ring. 3D shaped. Play value.

	NO	Key ring.	2D shaped. Low/no play value.
	NO	Magnets for e.g. refrigerators.	2D shaped. No play value.
	YES	<p>Figure (rabbit) with a solar cell.</p> <p>Made of plastic.</p> <p>The rabbit is wagging with its head and body.</p> <p>Fixed on a pedestal.</p> <p>Height about 13 cm.</p>	<p>Child appealing.</p> <p>Play value (it could be used for playing despite the pedestal).</p>

	YES	<p>Phone holder figure (dragon).</p> <p>Made of plastic.</p>	<p>Not fixed on a pedestal.</p> <p>Figure can be used in play without pedestal.</p> <p>Height about 8cm.</p>
			
	NO	<p>Baby teeth boxes.</p>	<p>Intended to be used by adults to keep children's teeth.</p> <p>No play value.</p>

Annex 6. Products for adult collectors



Criteria for classification as toys:

- Low price.
- Not traditionally dressed / painted.
- Shaped like a toy (e.g. Barbapapa, Winnie).

Criteria for classification as products other than toys:


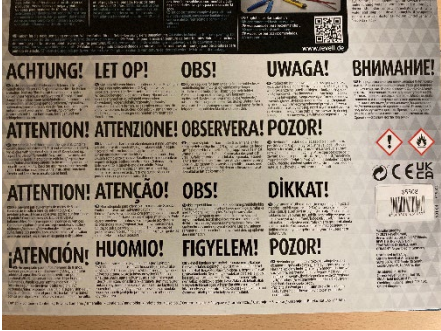
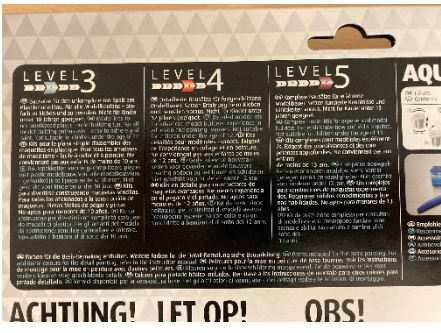
- Made of hard material and/or breakable material.
- Fixed on, or provided with, a pedestal.
- Detailed.
- Traditionally dressed / painted.
- Historical replicas of toys
- High price.
- Place of selling: not sold in toy shops.
- Limited number edition.
- Numbered, certificate of authenticity, display packaging (packaging serves as a display).
- Sophisticated and elaborated dress clothes.





Part A: Detailed and faithful scale models



Detailed and faithful scale models	Toy or not	Description of product	Criteria
	YES	Dollhouse furniture for children to play with.	<p>Toys for children, sold in toy stores.</p> <p>Sometimes less detailed than scale models.</p> <p>Play value.</p>
	NO	Scaled house, furniture and household articles for adult collectors.	<p>Detailed and faithfully scaled models.</p> <p>Often old-fashioned style or things that were used in the old days.</p> <p>Should be visibly and legibly marked as intended for collectors of 14 years and above.</p>

Detailed and faithful scale models	Toy or not	Description of product	Criteria
			Low/no play value.

Part B: miniatures to be assembled




Miniatures to be assembled	Toy or not	Description of product	Criteria
  	YES	<p>Plastic made kit to play with (45 pieces): to be assembled and painted.</p> <p>On the packaging 3 different skill levels are explained (level 3 for children aged 10+; level 4 for 12+, level 5 for 13+) .</p> <p>The shown example is labelled "level 3".</p> <p>Not suitable for children under the age of 8.</p>	<p>Toys for children, sold in toy stores or specialised shops.</p> <p>Play value.</p>




Miniatures to be assembled	Toy or not	Description of product	Criteria
 	YES	<p>Plastic made kit to be assembled and play with. Parts already painted. Low skill level (2). Age level 6+.</p>	<p>Sold in toy stores or specialised stores. Play value after assembly.</p> <p>Low skill level.</p> <p>Few pieces. Pieces fit without glue.</p> <p>Target group 6+.</p> <p>Advertised vividly (built your own dream, easy kit).</p>
 	NO	<p>Plastic kit to be assembled</p> <p>Painting provisional (not included in the packaging).</p> <p>Scaled WWII replica.</p> <p>Level 4 skill required.</p> <p>Parts are of dull colour.</p> <p>Cement glue required – sold separately.</p> <p>Painting is optional (paints and glue not included)</p> <p>Ages 14+</p> <p>Warning: “suitable for ages 14+”</p>	<p>Sold mostly in specialised shops.</p> <p>Higher skill levels required.</p>



Miniatures to be assembled	Toy or not	Description of product	Criteria
	YES	<p>Miniature car to be assembled by a child of 14+ 25 pieces Made of plastic Glue is not needed to assemble the car. Size: 13,5 cm long x 5 cm wide . Very light weight. It can break easily when assembled and played with. Doors cannot open, wheels can turn</p>	<p>Can be assembled by children < 14 years. Play value: once assembled, it is possible to play with the car, the wheels are turning. No detailed scale model.</p>
	NO	<p>Metal kit to be assembled. No paint required. Ages 14+</p>	<p>Sold in toy and specialised shops. Sharp metal parts (big, small and very small). Complex assembly instructions. Tweezers /pliers needed for assembly. High dexterity necessary. Target group 14+.</p>


Miniatures to be assembled	Toy or not	Description of product	Criteria
	NO	<p>Plastic, cardboard, metal and wooden parts to be assembled</p> <p>No paint required.</p> <p>Battery operated.</p> <p>CE marked</p> <p>Note: since this product is battery-operated, the CE marking has been affixed to ensure compliance with the Directive on the Electromagnetic Compatibility (EMC Directive) and the RoHS (Restriction of Hazardous Substances) Directive.</p> <p>Age 14+</p> <p>Small and dangerous parts (cables to connect to battery cap) included.</p> <p>Scissors, threading and glue required.</p>	<p>Sold in toy shops and specialised shops.</p> <p>Advertised vividly.</p> <p>High skills needed for the assembly.</p> <p>Not really suitable for playing.</p> <p>Target group 14+.</p>


Part C: Folk dolls, decorative dolls and other similar products

Folk dolls and decorative dolls and other similar articles	Toy or not	Description of product	Criteria
	NO	<p>Products for collectors – folk dolls and decorative dolls.</p> <p>Doll, made of hard plastic.</p> <p>Fixed to a pedestal.</p>	<p>Height about 30 cm.</p> <p>Sophisticated and elaborated dress clothes.</p> <p>Should be visibly and legibly marked as intended for collectors of 14 years and above.</p> <p>Low/no play value.</p>
	<p>YES</p> <p>NO</p>	<p>Doll.</p> <p>Made of plastic and plasticized face.</p>	<p>The price is: 15 – 30 euro (depending on the size).</p> <p>YES, is a toy when the dress can be removed, arms and legs can move. – Play value.</p> <p>NO, is not a toy when product is expensive, arms and legs cannot move and the dress cannot be removed; a traditional folk doll. – Low/no play value.</p>
	NO	<p>Folk dolls.</p> <p>Matryoshka.</p> <p>Also called Babushka dolls (Russian dolls).</p>	<p>Product made of wood, handicraft made, traditionally painted, expensive, sold in a e.g. souvenir shop.</p> <p>Low/no play value.</p>

	NO	<p>Figurine 'Casper'</p> <p>Height 16 cm</p> <p>Entirely made of rigid resin</p>	<p>Entirely made of rigid resin</p> <p>Not articulated</p> <p>On a pedestal</p> <p>Low play value</p>
	NO	<p>Figurine 'Little Kevin'</p> <p>Height 8 cm, width 9 cm</p> <p>Entirely made of rigid resin</p>	<p>Entirely made of rigid resin</p> <p>Not articulated</p> <p>Numbered with certificate of authenticity</p> <p>Low play value.</p>
	NO	<p>Magnolia Doll</p> <p>The doll comes with a pedestal and in a display packaging.</p> <p>Height about 30 cm .</p> <p>Made of polymeric material.</p> <p>It has a certificate of authenticity.</p>	<p>There is a limited number of dolls produced.</p> <p>The doll is very detailed and has a sophisticated dress.</p> <p>Highly priced (more than 100 euros)</p> <p>Mainly sold online via collector website, but not limited to it.</p> <p>The body is articulated at shoulders and hips, not at the elbows or knees: low play value.</p>

		<p>The following sentence appears on the doll's packaging: "This product is intended for adult collectors and is not intended for children under 14 years of age".</p>	
	YES	<p>Shape Barba papa.</p> <p>Matryoshka.</p> <p>Product made of e.g. plastic, wood.</p>	<p>Low price, mostly sold in toy shops.</p> <p>Same product as the traditional Matryoshkas but these products are cheaper and mass produced.</p> <p>Play value.</p>
	NO	<p>Decorative (battery-operated) robots, like e.g. a dancing/moving Santa Claus (with the size of a doll).</p> <p>The robot makes music and dances.</p> <p>These robots can be found as decoration in shops but can also be bought for private use.</p> <p>The CE marking has been affixed to ensure</p>	<p>No/low play value.</p> <p>Child appealing decorative product.</p> <p>Sold in shops selling decorative products.</p>

		compliance with the RoHS (Restriction of Hazardous Substances) Directive.	
	YES	<p>Vinyl bobble-head</p> <p>Fixed to a pedestal</p> <p>Height about 10 cm</p> <p>Warning: not suitable for children under 3.</p>	<p>Low price, mostly sold in toy shops and specialised shops.</p> <p>No recommended age.</p> <p>Play value (could be used for playing despite the pedestal; in some cases the pedestal is removable).</p> <p>Well-known character from popular films, series, etc.</p> <p>Also used for role playing.</p>

	YES	Vinyl figure, without a pedestal.	<p>Low price, mostly sold in toy shops and specialised shops.</p> <p>Attractive for children under 14.</p> <p>Play value.</p> <p>Well-known character from popular films, series, etc.</p> <p>Also used for role playing.</p>
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