

EU Plans to Amend Toy Safety Directive as Regards Allergenic Fragrances, Bisphenol A, Phenol and Benzisothiazolinone

On 11 August 2026, the European Commission notified the World Trade Organisation (WTO) ([G/TBT/N/EU/1231](https://www.wto.org/G/TBT/N/EU/1231)) for its draft Directive amendment to the Toy Safety Directive 2009/48/EC as regards allergenic fragrances in toys, bisphenol A, phenol and benzisothiazolinone.

The draft will introduce the following amendments to Annex II of the TSD:

Section	Changes
First paragraph in point 11	Inclusion of the fragrance Lilial (2-(4-tert-butylbenzyl) propionaldehyde) in the list of prohibited allergenic fragrances in toys
Appendix C	Deletion of the references to standards EN 71-10 and EN 71-11 as mandatory testing methods for bisphenol A, phenol and benzisothiazolinone in toys
	Reduction of the limit value for bisphenol A to 0.005 mg/l (migration limit)

In detail, Annex II to TSD will be amended as follows:

(1) In Part III, point 11:

a. In the first paragraph, the following entry is added:

No.	Name of the allergenic fragrance	CAS number
(59)	2-(4-tert-butylbenzyl) propionaldehyde	80-54-6

b. In the third paragraph, entry (7) is deleted;

(2) In Appendix C, the entries for the following chemicals are replaced by the following:

Bisphenol A	80-05-7	0,005 mg/l (migration limit)
1,2-benzisothiazol(3H)-one	2634-33-5	5 mg/kg (content limit) in aqueous toy materials
Phenol	108-95-2	5 mg/l (migration limit) in polymeric materials

Dates

- Proposed date of adoption and entry into force: **Q4 2026**
- Final date for comments: **10 October 2026**

References

https://members.wto.org/crnattachments/2026/TBT/EEC/26_04191_00_e.pdf

<https://technical-barriers-trade.ec.europa.eu/en/notification/40218>

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