

GERMAN TOY COMPLIANCE CHECKLIST

Mandatory & Recommended Legal Regulations for Placing Plush Toys on the German Market

Executive Summary: Germany enforces some of the strictest product safety, chemical, and environmental laws in the world for consumer goods. For plush toys (Plüschspielzeug), compliance is not governed solely by general EU directives, but is strictly reinforced by localized German legislation including the **German Toy Safety Ordinance (2. ProdSV)**, the **German Food and Feed Code (LFGB)**, the **German Packaging Act (VerpackG)**, and supply-chain auditing laws like the **LkSG**. Non-compliance results in immediate product recalls, market bans (Bundesnetzagentur/RAPEX listings), and severe corporate fines.

Verify each step of this checklist using accredited third-party laboratories (e.g., TÜV, SGS, Eurofins) prior to dispatching cargo to Germany.

1. PHYSICAL & MECHANICAL SAFETY (EN 71 SERIES & 2. PRODSV)

STATUS	LEGISLATION & STANDARD	PLUSH TOY SPECIFIC ACTION ITEMS & VERIFICATION METHODS
☐	EN 71-1:2014+A1:2018 Mechanical & Physical Properties Mandatory	Perform Seam Strength & Component Tension Tests: - Plush toys are automatically deemed intended for children under 36 months. - Soft seams must withstand a constant tensile force of 70N (seam test). - Hard components (plastic eyes, noses, buttons) must withstand a tension force of 90N and torque of 0.34 Nm without detaching or breaking to prevent choking hazards (small parts cylinder test).
☐	EN 71-2:2020 Flammability of Toys Mandatory	Verify Rate of Flame Spread: - Test pile fabrics, plush skins, and internal stuffing fibers. - Ensure the maximum rate of flame spread is ≤ 30 mm/s, or the toy self-extinguishes. - High-pile fabrics must be assessed for "surface flash" hazards where fire spreads rapidly over the surface of the plush.
☐	EN 71-3:2019+A1:2021 Migration of Certain Elements Mandatory	Heavy Metal Extraction (Category III - Scraped-off Materials): - Test outer fabrics, synthetic yarns, felt patches, sewing threads, and internal filling. - Must satisfy strict migration limits for 19 elements under simulated gastric acid exposure (e.g., Lead ≤ 23 mg/kg, Cadmium ≤ 17 mg/kg, Organic Tin ≤ 12 mg/kg).
☐	German Toy Safety Ordinance 2. ProdSV § 7 (Washing Safety) Mandatory (DE Specific)	Pre-Test Wash Cycle Durability: - German law requires that plush/soft toys intended for young children remain fully compliant and structurally safe after washing. - Sample plush toys must be washed according to care labels (e.g., machine wash 30°C) before undergoing the mechanical EN 71-1 and chemical EN 71-3 tests.

2. CHEMICAL, SKIN CONTACT & ENVIRONMENTAL COMPLIANCE

STATUS	LEGISLATION & STANDARD	PLUSH TOY SPECIFIC ACTION ITEMS & VERIFICATION METHODS
☐	REACH Regulation (EC) 1907/2006 Annex XVII Restrictions Mandatory (EU/DE)	Strict Chemical Restriction Screening: - Phthalates (Entries 51 & 52): DEHP, DBP, BBP, DINP, DIDP, DNOP, and DIBP must be < 0.1% by weight in all soft plastic components (e.g., internal rattle elements, plastic noses/eyes, anti-slip foot dots). - Azo Colourants (Entry 43): No synthetic textile dyes may release aromatic amines exceeding 30 mg/kg . - Cadmium (Entry 23) & Lead (Entry 63): Total content in plastics and metal zippers/wires must be under legal thresholds.
☐	German Food, Feed & Commodities Code LFGB Section 30 & DIN 53160 Mandatory (DE Specific)	Saliva and Sweat Resistance: - Plush toys are legally designated as "articles of daily use" with prolonged oral and skin contact. - Fabrics and embroidery must be tested according to DIN 53160-1 (resistance to saliva) and DIN 53160-2 (resistance to sweat) to ensure colors do not bleed or transfer chemical irritants to the child's mouth or skin.
☐	German BfR / AfPS GS 2019:01 PAK PAH Limits (Polycyclic Aromatic HC) Recommended / GS Mark	Enforce Polycyclic Aromatic Hydrocarbons (PAH) Limits: - While EU REACH restricts PAHs to 0.5 mg/kg for toys, German authorities enforce much tighter restrictions for the <i>Geprüfte Sicherheit (GS) Mark</i> . - Category 1 toys (prolonged skin contact) require limits of < 0.2 mg/kg for the 8 critical PAHs (such as Benzo[a]pyrene). Highly recommended for premium German retail distribution.
☐	POP Regulation (EU) 2019/1021 Persistent Organic Pollutants Mandatory	Prohibit Hazardous Flame Retardants: - Confirm that fabrics and filling fibers are free of banned flame retardants. - Laboratory verification required for Short-Chain Chlorinated Paraffins (SCCPs < 0.15%) and Decabromodiphenyl Ether (DecaBDE < 10 mg/kg).

3. GERMAN PACKAGING ACT (VERPACKG) - RECYCLING & WASTE MANAGEMENT

STATUS	LEGISLATION & REGISTRATION	MANDATORY STEPS FOR IMPORTERS, BRANDS & SELLERS
☐	VerpackG - ZSVR Portal LUCID Registration Mandatory before selling	Establish Brand Registration: - Register your commercial brand name/legal entity with the Stiftung Zentrale Stelle Verpackungsregister (ZSVR) via the online portal (LUCID). - Receive a unique LUCID Registration Number. It is illegal to list products in Germany without an active LUCID registration.
☐	Systembeteiligung (Dual System) Recycling Contract Licensing Mandatory Fee	Execute Licensing Agreement: - Establish a licensing contract with an approved "Dual System" operator (e.g., BellandVision, Landbell, Interseroh, Reclay, or Der Grüne Punkt). - Report and pay annual licensing fees based on the estimated weight of packaging materials (cardboard boxes, polybags, tags, hanging threads) placed on the German market.
☐	VerpackG § 15 Compliance Continuous Reporting Mandatory	Synchronize Data Submissions: - Submit exact duplicate packaging weight data concurrently to both the LUCID portal and your chosen Dual System partner. - Maintain structural records of all packaging designs used for plush toys (including wholesale shipping boxes and retail hangtags).

4. GERMAN SUPPLY CHAIN DUE DILIGENCE ACT (LKSG)

STATUS	FRAMEWORK & STANDARD	B2B SOURCING FLOWDOWN REQUIREMENTS FOR GERMAN BUYERS
☐	Lieferkettensorgfaltspflichtengesetz LkSG Supply Chain Audits B2B Flowdown Standard	Fulfill Social and Environmental Flowdown Requirements: - German distributors, wholesalers, or large retailers (with ≥ 1,000 employees) must contractually enforce LkSG standards on foreign suppliers. - Ensure manufacturing facilities (e.g., in Shenzhen) possess verified social responsibility audits: BSCI (Amfori), Sedex (SMETA 2-pillar or 4-pillar), or ICTI Toy Program (IETP) certification. - Prove strict adherence to prohibitions on child labor, forced labor, and unsafe working conditions.
☐	LkSG Environmental Standards Minamata & Stockholm Compliance Mandatory Flowdown	Verify Chemical Handling Processes: - Ensure the manufacturing plant complies with the Minamata Convention (mercury bans) and the Stockholm Convention on Persistent Organic Pollutants. - Document that no waste-water dumping or hazardous chemical discharge occurs during textile dye and finishing stages.

5. LABELING, MARKINGS & DOCUMENTATION

STATUS	REQUIREMENT & DIRECTIVE	GERMAN SPECIFIC LAYOUT, TRANSLATION & WARNING STANDARDS
☐	CE Marking (Directive 2009/48/EC) Visual Compliance Mandatory	Affix Unrestricted CE Mark: - The CE logo must be permanently visible and legible on the plush toy (via a sewn-in wash label) and on any exterior retail hangtag or polybag. - Vertical height of the CE mark must be at least 5 mm . Proportions must be mathematically correct (inner line alignment).
☐	Traceability (2. ProdSV § 6) Batch / Product Identification Mandatory	Include Unique Identifiers: - The plush toy must bear a permanent type, batch, serial, or model number on the sewn-in label to allow rapid batch containment in case of safety recalls.
☐	EU Importer/AR Address (ProdSG) Physical Address Labeling Mandatory (Direct Importers)	Affix EU Physical Address: - For products imported into Germany from third countries (such as China), the physical postal address of the EU Importer or EU Authorized Representative (AR) must be permanently displayed on the packaging or toy label. Digital addresses/emails are insufficient.
☐	German Safety Warnings Age warning & warning symbol Mandatory (DE Translation)	Implement Correct Warning Format in German: - While plush toys must be safe for all ages, if specific design features require an age warning, it must be in German: "Achtung! Nicht für Kinder unter 36 Monaten geeignet." - Accompany the warning with the standard 0-3 warning pictogram or written text, and immediately declare the specific danger: <i>"Kleine Teile. Erstickungsgefahr."</i> (Small parts. Choking hazard).
☐	Care & Wash Labeling Textile Labelling Act Mandatory	Fiber Composition & Care Symbols (ISO 3758): - State the precise fiber composition in German (e.g., <i>"100% Polyester"</i>). - Include standardized cleaning symbols to support 2. ProdSV washing durability instructions.
☐	Technical Documentation EC Declaration of Conformity (DoC) Mandatory (10-Year Archiving)	Draft and Archive Technical File: - Create an EC Declaration of Conformity translated into German (EU-Konformitätserklärung) certifying that the plush toy satisfies 2009/48/EC, EN 71, REACH, and LFGB. - Maintain a comprehensive Technical File (including CAD drawings, BOM materials lists, production quality records, and full laboratory test reports) for at least 10 years post-market placement.

Legal Disclaimer: This compliance checklist is provided by LeelineToys for informational and commercial planning purposes only and does not constitute formal legal counsel. German and EU toy safety legislation is subject to continuous amendments (including upcoming revisions to the general EU Toy Safety Regulation). While we strive for absolute accuracy, manufacturers and brand owners must independently verify compliance through qualified testing, inspection, and certification partners prior to importing toys into the European Economic Area.

Sourcing plush toys or navigating EU/German toy compliance audits? Let LeelineToys guide your manufacturing pipeline.
Visit us at www.leelinetoys.com or contact our compliance desk at info@leelinegroup.com.