

03.07.22

To whom it may concern at SIK:

Following my correspondence with Alex Jensen, I would like to present my point of view and put forth my contribution regarding the way/structure in which measures have been taken to ensure product safety for products made for children of new born to three years old.

Below is my presentation of the issues I've noticed, and arguments for my point of view, as well as my solution for improved product safety in relation to children below the age of three.

I've struggled for several years to find accessible information that describes the criteria that DIY products for this age group should meet. Within my industry, DIY for knitters, crocheters, and sewers has exploded in popularity over the past decade.

I've been involved in the production since 1989 – various products have passed through my hands, during my many years as an employee at a large Danish company and during the past twenty years working independently. During the past six years, I've been involved in DIY products. I've always worked extensively with test reports and testing institutes.

Part of my collection is DIY accessory products for crocheters and knitters who make their own toys for small children. There's a lot to be keenly aware of when making parts for a toy.

For one thing, as some of us are very familiar with, the use of chemicals must be controlled and it is necessary to be able to document/provide evidence of this, most often via test reports.

And then there are part/products, such as, for instance, a wooden figure/figure, where the instructions show that it can be used as part of a pacifier cloth or activity ring. In the case of a crocheter/knitter using the figure for this purpose, the figure, if it was purchased as a ready-made toy, must be able to pass Template A, among others.

The last category of extremely relevant information is the accessory that is put inside a crochet sensory toy.

Why is it, for instance, that you cannot put a music box larger than 30mm inside the paw? Why must it be less than 30mm? I could list many similar examples.

The journey I've been on while developing my collection, and my designs, have provided several surprises. DIY parts are not really complete products, and they are not products to be used by children, but by adults. Despite the fact that I've been working in production for many years, it's been very difficult to get a solid understanding of what to be aware of, and how to relay this information to consumers - and not least why.

I recently had a product, a tow cart, recalled. It was produced in 2019, it passed EN71,1, 2, and 3 for children above the age of 12 months. The wooden tow cart has four silicone rings placed in a narrow groove at the centre of each wheel in order to reduce noise. I always knew that the rings could be removed without the use of tools. Recently, I was asked if it was 'legal' that the rings were removable. I checked the test report in which the rings were described in the section on 'removable parts', so, not an issue. I then contacted my safety consultant and asked why it was okay for them to be removable. As long as they were around D33mm in diameter, it wouldn't be an issue. The rings on the tow cart weren't – they were around D27mm. When I contacted the testing institute, they informed me that the model we had sent to them didn't have 'loose' rings. I rejected this claim categorically, and the factory confirmed to my representation in China that the tow carts they had produced subsequently were identical to the one sent to the testing institute. Experience had shown that it was important for the rings to be as tightly wedged into the wheel

as possible. On the testing institute's own photograph in the test report, it is clearly visible that the silicone rings are well above the wooden wheel – which demonstrates that the rings are, in all likelihood, easy to remove by hands/nails.

What I want to point out as crucial issues from this case is that the test report contains a section on removable parts and that I, as a 'layperson', had no earthly chance of understanding that it could be thought **not** to be loose. That is, if it was firmly wedged into the wheel when the testing institute tested it (which isn't true), then everything is fine, and the testing institute has handled the report properly.

It is simply unbelievable to me that there are no requirements for a test report to contain clear information and clear disclosures regarding:

- The specific parts that were tested
- If any of these were removable
- If so, which parts, and a clear depiction of them.

Today, there are no requirements for test reports to spell out these details. This is absurd, as it opens a panoply of possible misinterpretations of a test report. How is it not possible to expect a test report to contain crystal-clear and visual marketing of a product, its parts, and their removability? This is so crucial to product safety that there can be no room for misinterpretations.

It is my experience that it has been years since the standards/directives adhered to by the testing institutes have been renewed or revised. The rapid growth is worth noting here, with many new products and young start-ups grabbing on to the zeitgeist and developing new concepts. Products for 0-3-year-olds have exploded over the past decade. Most recently, Danish companies have been sold for millions, with more on the way.

There is a need to place stricter demands on the leading groups' ways of handling product safety. It is remarkable that people in authority can accept that the work they carry out has difficulty **functioning in practice**. One might ask whether this is a question they've ever asked themselves!

As far as my tow cart goes, I have made a complaint to a high authority at the testing institute – they refuse to comment on their own photo, which shows the position of the silicone rings over the wooden wheels. I have asked the testing institute if there is a specific place you can complain about their report. I mean, these are institutes approved by public authorities, in this case Europe's largest testing institute. I haven't received a reply, but I have since found out that there is a complaints authority, and I will continue the case there.

In general, test reports are designed in a way that places a lot of emphasis on the final result (pass) featured on the front page. I have now learned to take this with a grain of salt ... even though pages 2, 3 and four all state the same. Further into the report, it may state that this only regards children above the age of three. It is simply unforgivable not to state this on the front page next to the final result!

How can there be this much latitude for misleading information or misinterpretations? We are talking about product safety for small children. We are talking about a product that no one above the age of 10 months would be interested in. How is it even possible that no one caught this misunderstanding? It would have required so little to write in the final result that it only applies to children above the age of three – the information would have been clear, and the product error would have been caught.

My most recent experience with a testing institute, and their misleading report, is almost funny. Following the case I just described, I printed out all my test reports and went through each page to ensure that I hadn't misinterpreted any of them. There was one. A product that I produced not very long ago – a D75mm Soft TPE ring/pacifier ring. Its report showed the correct image as well as the name of my company. What I hadn't noticed when I received the test report, aside from the result which was a pass, was that the product was described as a children's garden tool set, and further into the report, it stated that the product was meant for children above the age of three. This time, I remained calm; I knew that my D75mm ring had nothing to do with the description in the report – but I was astounded. Testing facilities' claim that two highly accredited people always ensure to review and sign the test report – I no longer believe that.

Needless to say, I complained about the report, and the large German testing institute agreed to make an updated report. It arrived, but since I no longer trusted any of it, I went through the pages all over again – and they still contained errors. The report still contained a line that stated: *This is not a toy* etc. Once again, I wrote to all the people that are apparently cc'd in these reports and made them aware that the report still had errors despite being signed by two new people. Third time's a charm – I have now received a report that correlates with the product's proper use. I didn't receive an apology.

In early spring, I received a notice with you, SIK, as the sender. I received a – by my standards – brutally phrased criticism of one of my products. Namely, you wrote ***'SIK assesses that the product is not constructed or manufactured in compliance with EN 71-1+A1:2018'***.

We responded: 'To ensure the components' qualities, they are designed, manufactured, and tested against the requirements for toys, using safety standards EN 71-1, -2 and -3 for the product in question.'

As stated in the attached test reports from January 27, 2021, during the production of this product, which is part of a series, we also carried out tests with the above scope, including EN 71-1+A1:2018. The product meets the requirements stated in EN 71-1 for toys made for children below the age of three, including points such as 5.1 on small parts, including an additional soak test, as well as point 5.8 regarding the shape and size of certain toys. I was therefore very surprised by the request and would like to clarify as soon as possible which noncompliance with EN 71-1 you are suspecting.

I didn't receive an actual response, other than a notice stating that my points had been noted! There was no apology or even the slightest acknowledgement of a mistake. To my understanding, making a mistake/recall, stated in a manner that is black and white, will automatically result in threats of a police report.. I have high standards and do my utmost to ensure that all my products meet requirements for safety. So, to receive written criticisms, based on false information, and that may lead to a police report, I find to be grossly unfair.

I would like to add that all my test reports have always been made publicly available. They can be downloaded from our website at [www.gohandmade.dk](http://www.gohandmade.dk)

I made an attempt to try to understand the standards regarding pacifier chains/seleclips after having paid around DKK 1,400 to gain insight into the requirements. As I remember it, once I received the link, I was made aware that the link would be erased one month later or something to that extent. Excuse me, but – why isn't it possible to simply receive a file? To be on the safe side, I started printing the document, an enormous number of pages. It was apparent that the terminology was meant for engineers at testing institutes. Why can't the management at Dansk Standard relay this information in a way that is accessible to those who need to know what requirements our products should meet? This shouldn't be possible only *after* a testing institute has processed the product in their laboratories. It would be easy to make a single-

page explanation that clearly describes the necessary knowledge that would avert many improperly produced pacifier chains.

Many would probably argue that there haven't been enough resources. Up until early 2022, Dansk Standard has had the same management. A management receiving very high salaries. Dansk Standard is state funded. Who is responsible for relaying knowledge and information in a way that is comprehensible to us, the producers of the products? It would be highly appropriate to spend some of the state aid on consultancy firms in Denmark that would be able to advise and communicate in an accessible manner. It would make a huge difference if a program was launched to communicate safety to the market.

I've attached a (safety) guide that I'm developing for the average consumers, *Farmor* and *Bedste* – it concerns all the issues that can be difficult to understand when crocheting/knitting DIY toys.

From my own spot checks carried out in the industry and based on what I've learned and experienced in recent years, I know that information is highly needed. There are many products on the market with various 'lacks'. I don't think anyone does this intentionally. It's about one thing and one thing only – getting the information into the market as much as possible.

I believe that SIK, the testing institutes, DS, and our politicians have the best intentions, but I wish SIK would consider involving people with other competences who can assess the above criticism.

Sincerely,

Hanne Tolberg