



Product Service

Customer Information

PAH Limits/GS Certificate

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News:

New chemical testing requirements for GS certification since 1 April 2008 – exemptions include tires of ride-on toys for children

On 20 November 2007, the German Committee for Technical Equipment and Consumer Products (AtAV) decided to make the previously voluntary testing for Polycyclic Aromatic Hydrocarbons (PAHs) mandatory for GS certification.

This change affects all consumer products which may contain PAHs. The new test specification for GS certification came into effect on 1 April 2008.

A binding and updated specification for PAH testing which also includes a regulation governing low volumes (total mass under 500 mg) has been available in document ZEK 01.2-08 since 10 December 2008.

Materials which may contain PAHs include elastomers (plastics and rubber materials), black or dark-colored polymers, coatings,

lacquering and varnishes and materials treated with preservation agents (naphthalene etc.), such as brush bristles, leather, raffia or wood.

The following components and materials need to be examined during PAH testing of products:

All (gripping) surfaces that may contain PAHs and may come into contact with skin or be put in the mouth within the scope of the intended use or reasonably foreseeable misapplication (however, not in the case of gross misuse).

Exempt from the above regulation are tires or brake blocks of ride-on toys for infants under 36 months of age based on the assumption that children will not put these parts in their mouths. Provided these parts fulfill certain criteria, they fall into category 3.

Mandatory limits for PAHs in products:

Parameters	Category 1	Category 2	Category 3
	Materials intended to be put in the mouth and toys for children under 36 months intended to come into contact with skin ²	Materials not covered by category 1 with foreseeable contact with skin for more than 30 seconds (long-term skin contact)	Materials not covered by categories 1 or 2 with foreseeable contact with skin for up to 30 seconds (short-term skin contact)
Benzo[a]pyrene mg/kg	Not detectable (<0,2) ¹	1	20
Sum of 16 PAHs (EPA) mg/kg	Not detectable (<0,2) ¹	10	200

¹ If the limits of category 1 are exceeded, but the limits of category 2 are still complied with, suitability for contact with oral mucous membranes may be verified by an additional specific migration test of the PAH-containing components according to the EN 1186 series of standards and Article 64 LFGB 80.30-1. The results of the migration test shall be evaluated according to the criteria for foodstuffs set forth in food law.

² In line with the resolutions passed by the Experience Exchange Group 2 (EK 2).

Since PAH testing of products is a general requirement, the ZLS (German accreditation body for GS mark issuing bodies) has defined the following procedure:

- **certificates issued from 1 April 2008**
Mandatory application of the PAH document in line with the requirement of paragraph 4.1 ZEK 01.2-08 from 1 April 2008.
- **certificates issued before 1 April 2008**
Existing GS certificates will remain valid for the time being. Within the scope of periodic surveillance (within one year at the latest), compliance with the requirements set forth in paragraph 4.1 of the ZEK document must be verified in line with the risk assessment, irrespective of whether the product was inspected in the

factory or not. Should periodic inspection reveal that the product does not comply with the relevant requirements, the certificate shall be withdrawn without delay.

The experts of TÜV SÜD Product Service will be happy to advise you personally on the new regulations and will inform you about the impacts the current amendments may have on the GS marking of your products.

Further information is available on the Internet at www.tuev-sued.com/PAH-info, from your personal account manager or via e-mail to tuev-ps.redaktion@tuev-sued.de.

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