



To whom it may concern

## **CONFORMITY STATEMENT**

We, the LEGO Group, declare under our sole responsibility that all LEGO® toys are in conformity with the relevant legislation and standards with amendments, as applicable, including:

- Directive 2009/48/EC on the safety of toys
- EN 71 Safety of toys
- Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), Annex XVII
- EN 14362 - Textiles - Methods for the determination of certain aromatic amines derived from azo colorants
- Directive 2012/19/EU on waste electrical and electronic equipment (WEEE)
- Directive 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS)
- EN 62115 Electric toys - Safety
- Directive 2014/30/EU on electromagnetic compatibility (EMC)
- EN 55014 Electromagnetic compatibility - Requirements for household appliances, electric tools and similar apparatus
- Directive 2014/53/EU - Radio Equipment Directive (RED)
- Directive 2006/66/EC on batteries and accumulators and waste batteries and accumulators
- Directive 2013/56/EU amending directive 2006/66/EC (on batteries and accumulators and waste batteries and accumulators)
- Directive 2014/35/EU on electrical equipment designed for use within certain voltage limits (LVD)
- Directive 2009/125/EC ecodesign requirements for energy-related products
- Regulation (EC) No 278/2009 ecodesign requirements for no-load condition electric power consumption and average active efficiency of external power supplies
- Directive 94/62/EC on packaging and packaging waste (including directive 2013/2/EU amending Annex I regarding the type of items considered as packaging)
- ISO 8124 Safety of toys
- IEC 62115 Electric toys - Safety
- FHSA, Federal Hazardous Substances Act (15 U.S.C. §§1261–1278)
- Child Safety Protection Act (CSPA - Amendments to FHSA)
- 16 CFR 1501 Method for Identifying Toys and Other Articles Intended for Use by Children Under 3 Years of Age Which Present Choking, Aspiration, or Ingestion Hazards Because of Small Parts



- CPSIA, Consumer Product Safety Improvement Act (Amendments to CPSA)
- ASTM F963, Standard Consumer Safety Specification for Toy Safety
- ASTM F 2923-14, Standard Specification for Consumer Product Safety for Children's Jewelry
- CPSA, Consumer Product Safety Act (15 U.S.C. §§ 2051–2089)
- Illinois Lead Poisoning Prevention Act (Public Act 095-1019, Illinois, USA)
- CONEG ("Model Legislation" c/o Northeast Recycling Council, Inc. (NERC/TPCH)
- 47 CFR Part 15 - Radio Frequency Devices
- CCPSA, Canada Consumer Product Safety Act (S.C. 2010, c. 21)
- Canada Toys Regulations (SOR/2011-17)
- Canada Phthalates Regulations (SOR/2016-188)
- Canada Surface Coating Materials Regulations (SOR/2016-193)
- Consumer Products Containing Lead Regulations SOR/2018-83
- Children's Jewellery Regulations: SOR/2018-82
- ICES-001 Industrial, Scientific and Medical Radio Frequency Generators
- ICES-003 Information Technology Equipment (ITE) – Limits and methods of measurement
- NOM-015-SCFI-2007, Commercial Information - Labeling for Toys
- NOM-252-SSA1-2011, Environmental Health. Toys and school articles. Limits of bioavailability of heavy metals. Chemical specifications and test methods
- European Council Regulation 2037/2000/EC of 29 June 2000 on substances that deplete the ozone layer (and amendments). The CFC, HBFC, HCFC, Halons, Tetrachloromethane, Trichloroethane and Bromomethane requirements.
- POP: Regulation (EC) no 850/2004 of the European Parliament and of the council of 29 April 2004 on persistent organic pollutants

Below please find further information on how the LEGO Group ensures the conformity of all LEGO® toys to internal and external requirements:

## 1. **Safety Aspects**

### 1.1. **Internal Assessments**

All LEGO elements undergo a safety assessment regarding mechanical/physical safety, electrical safety, hygiene, and flammability hazards. Only when an element is made of an approved material and has been internally approved in the safety assessment will it be used in LEGO toys.

The control process also includes an assessment of each new LEGO model. A toy safety report concludes with mechanical testing of elements from the start of production. Regular spot checks are carried out during production with both measurements and tests. In addition, chemical tests are performed on raw materials.



## **1.2. Specific Tests**

All finished products are tested according to applicable standards by third party, accredited testing institutes.

All suppliers are obliged to sign a Purchasing Agreement, which includes our specifications for e.g. chemical aspects.

### **1.2.1. Chemical Substances**

Information in accordance with Regulation (EC) 1907/2006 "REACH" and its Article 33 (Duty to communicate information on substances in articles), is available on [LEGO.com/REACH](http://LEGO.com/REACH).

Polyvinyl Chloride (PVC) is not used in LEGO® toys. Polychlorinated biphenyl (PCB) is not used in the formulation of any LEGO bricks.

Plastic raw materials, decoration inks, metallic parts and textiles are tested at third party accredited test institutes to applicable national and international requirements in standards and regulations as listed above.

Packaging Materials are tested for compliance with relevant standards and legislation as listed above for packaging and packaging waste.

### **1.2.2. Electric and Electronic Products**

Electric and electronic toys are evaluated and tested according to requirements in relevant standards and legislation.

All mains power supplies are tested according to relevant standards and legislation (e.g. 110V power supplies for the US are UL listed).

## **2. Manufacturing**

The manufacturing sites use an approved set-up including the necessary production and testing equipment. The same requirements are applied irrespective of whether the production is placed at our own facilities or outsourced to qualified suppliers.

For each element, the manufacturing sites receive specifications containing information on tests to be carried out ensuring consistent product quality. It is the responsibility of the manufacturing site that the tests are carried out, and that the results are documented and filed. Failing test results require immediate inventory control and corrective and preventive actions.



### **3. Production Sites**

LEGO® toys covered by this document are manufactured by:

LEGO System A/S  
Aastvej 1  
7190 Billund  
Denmark

LEGO Production, s.r.o.  
SMA  
Jutská 2779  
272 01 Kladno  
Czech Republic

LEGO Production s.r.o  
Billundska 2757  
272 01 Kladno  
Czech Republic

LEGO Manufacturing Kft.  
LEGO utca 15.  
4400 Nyiregyhaza  
Hungary

LEGO Operaciones de México, S.A. de C.V.  
Boulevard Nexxus ADN 2400  
Ciénega de Flores  
Nuevo León C.P. 65550  
Mexico

LEGO Toy Manufacturing (Jiaxing) Co., Ltd.  
No 2283, Tongxiang avenue,  
Jiaxing 314036,  
China

And a number of subcontractor production sites in different countries.

### **4. Quality Assurance**

All LEGO owned factories and relevant sites are certified to ISO 9001:2015 Quality Management System. Certificates are available upon request.

The Management System is applicable to consumer and customer interaction, managing, design, product development, purchasing, manufacturing, distribution, and sale of LEGO branded children's products.



Products manufactured entirely by external suppliers are subject to close quality control and assurance measures. A quality plan is defined and executed by the supplier under supervision by LEGO® quality inspectors. Documentation of compliance is maintained by the supplier and validated by the LEGO Group.

## 5. Documentation

All product safety test results are filed by the technicians in the product development area, Global Procurement (purchasing department) and the product safety organisation in Billund, Denmark.

This information is available upon request for inspection by national authorities.

## 6. Independent Testing / 3rd Party Testing

As noted above, internal LEGO approval and documentation focuses on the individual element/component. Independent laboratories test all LEGO toys for compliance with the relevant requirements.

Testing also evaluates the different types of storage containers used as packaging for LEGO toys.

## 7. Further Information

Please contact Corporate Quality if you have any questions or require more information.

Billund, 20 March 2019

Kind regards  
LEGO System A/S

A handwritten signature in blue ink, appearing to read "Christian Wetterberg".

Christian Wetterberg  
Senior Director of Product Safety & Compliance  
Corporate Quality