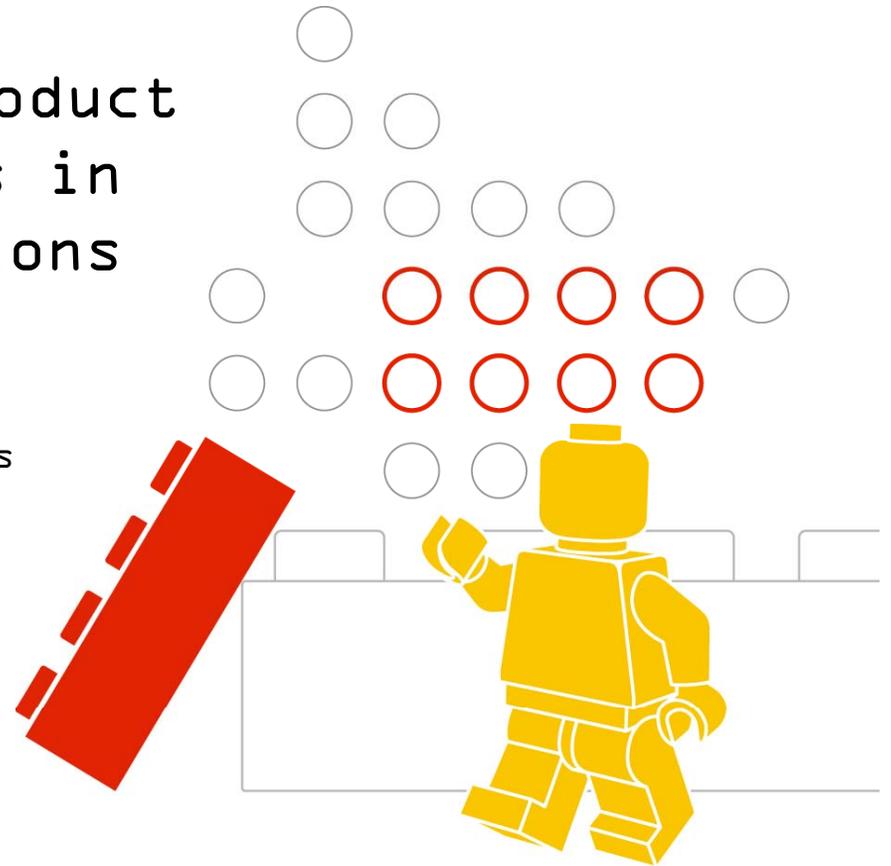




# Managing Consumer Product Safety Requirements in Multiple Jurisdictions

Nancy MacPherson

Director, Government Affairs

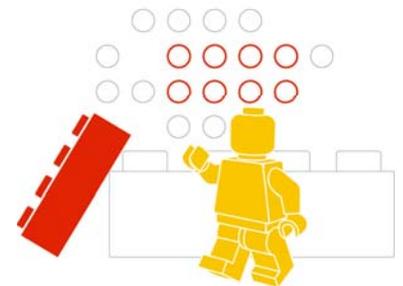


# LEGO® world map

**Headquarters:** Denmark (Billund)

**Concept and product development:** Denmark, Germany, UK, Japan and the USA.

**Production:** Denmark, The Czech Republic, Hungary & Mexico



# SOME LEGO® FACTS AND FIGURES

68,000  
minute

LEGO elements produced per

36,000,000,000  
2010

LEGO elements molded in

560,000,000,000  
elements

Approximate total # of  
produced

130

Countries where LEGO is sold

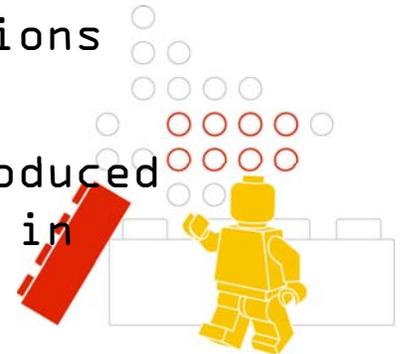
75+

Available packaging versions



Mexico

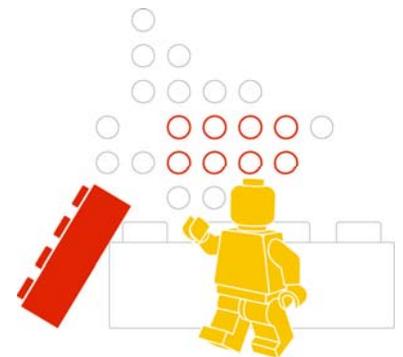
% of LEGO NA products produced  
LEGO production facility in



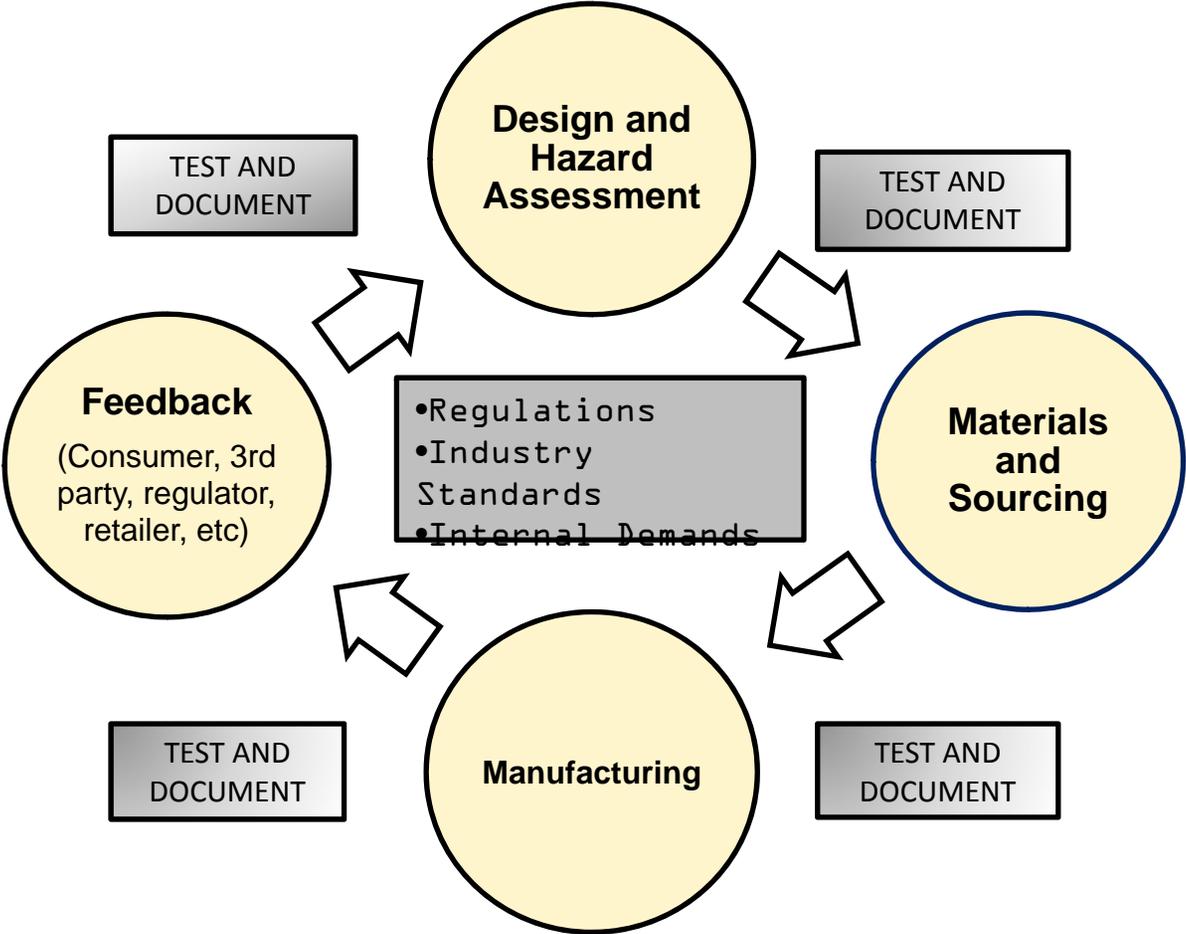
## The Reality...

LEGO needs to produce 1 version of product that meets the most stringent global safety requirements so that we can move those 560 billion elements anywhere in the world.....

Additionally, packaging details must support country specific language, markings, legal and safety text for 130 individual countries....



# The LEGO Product Safety Model → 1 Global Product Spec



Sounds simple enough, right??

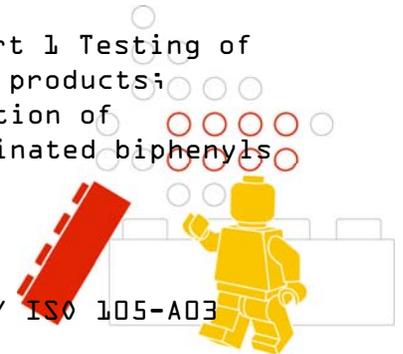




# Additional LEGO

## Requirements

<u>Code of Federal Regulations</u> (21 CFR) part 174 - Indirect Food Additives: General.	relating to plastic materials and articles intended to come into contact with foodstuffs	Polymers, and from paper and Paperboard."
<u>Code of Federal Regulations</u> 21 (21 CFR) part 175.105 - Indirect Food Additives: Adhesives and components of coatings.	<u>European Council Regulation (EC) No 1935/2004</u> of 27 October 2004 on materials and articles intended to come into contact with food.	<b>Australian Standard</b> 2070.6 1984 part 6 guidelines: Plastic materials for food contact use, colourants. The soluble Ba limit value.
<u>Code of Federal Regulations</u> 21 (21 CFR) part 176 - Indirect Food Additives: Paper and Paperboard components.	<u>Federal Institute for Risk Assessment (BfR) XV sec. III</u> as of 1 June 2007 "Silicone elastomer (Silicone rubber)"	DIN EN 648 Paper and board intended to come into contact with foodstuffs - Determination of the fastness of fluorescent whitened paper and board
<u>Code of Federal Regulations</u> 21 (21 CFR) part 177 - Indirect Food Additives: Polymers.	<u>Federal Institute for Risk Assessment (BfR) I-LII</u> concerning plastics.	DIN EN 646:2006 Paper and board intended to come into contact with foodstuffs - Determination of colour fastness of dyed paper and board
<u>Code of Federal Regulations</u> 21 (21 CFR) part 177.2600 - Indirect Food Additives: Rubber articles intended for repeated use.	<u>Federal Institute for Risk Assessment (BfR) XXI</u> as of 1 June 2007 "Commodities based on Natural and Synthetic Rubber"	JIS L 1096-1990, EN ISO 14184-1
<u>Code of Federal Regulations</u> 21 (21 CFR) part 178 - Indirect Food Additives: Adjuvants, production aids, and sanitizers.	<u>Federal Institute for Risk Assessment (BfR) IX: Colourants for Plastics and other Polymers Used in Commodities</u>	DIN 51527, part 1 Testing of petroleum products; determination of polychlorinated biphenyls (PCB)
<u>Code of Federal Regulations</u> 21 (21 CFR) part 178.3570 - Lubricants with incidental food contact.	<u>Federal Institute for Risk Assessment (BfR) XLVII</u> as of 1 January 2003 "Toys from Plastics and other	DIN 38 407 DIN EN 53 415 DIN EN 53160 / ISO 105-A03
<u>European Commission Directive</u> 2002/72/EC of 6 August 2002		



## The Vision...

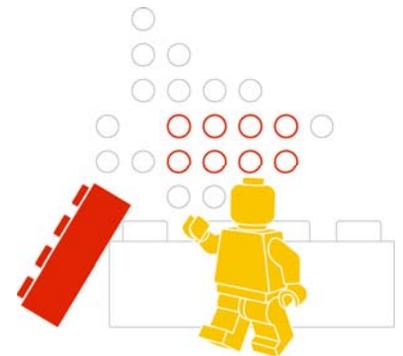
Alignment of chemical, mechanical, flammability, acoustic and electrical requirements

Reduced time spent on paperwork, recordkeeping and administrative work and increased efforts in risk, safety and material assessments

Sharing of best product safety practices

Strengthening safety standards through scientific risk-based approaches

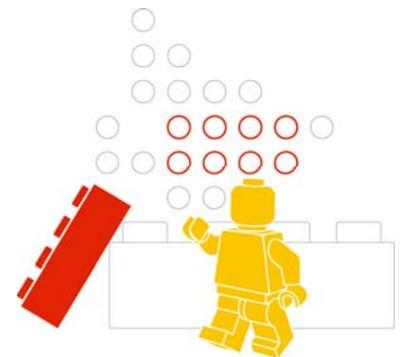
Simplicity in labeling, warnings, legal text



## The Middle Ground....

Align new requirements to minimize redundancies and inconsistencies that are difficult to manage across global supply chains.

Establish forums that provide early collaboration on product safety issues with legislators, regulators, standards organizations, consumers, NGOs, manufacturers and retailers



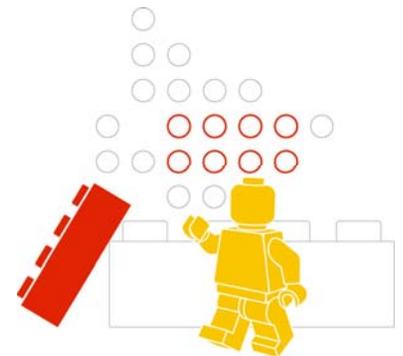
## How does LEGO help move this forward....

Participate in NA and global regulatory and standardization activities

Share our data, our resources, our 'real world' experiences, both good and bad....

Actively engage with ASTM, ISO, ICTI, the toy trade associations, NGOs and retail partners.

Most importantly....we remain optimistic!





Thank  
you

