



## Importing and retailing children's graphics materials



If you import or manufacture graphics materials for children, such as crayons, water colour paints and finger paints, you need to follow special rules to make sure these products are safe. Children often chew on crayons and put their fingers in their mouth, therefore it's important that graphics materials don't contain any toxic materials that could harm children's health.

Graphic materials are regulated under the *Graphic Materials Group Standard 2009* approved under the Hazardous Substances and New Organisms Act 1996 (HSNO). This document provides guidance on the rules that apply to manufacturers and importers of graphics materials in New Zealand.

### Substances covered by this group standard

Any graphic materials that meet the scope of the group standard can be approved under this standard. This group standard however, is the only approval that can be used for finger paints, children's crayons, and children's water colour paints. This means that for these products you **must** comply with the rules set out in the group standard.

Face paints are not covered by the Graphic Materials Group Standard but are regulated under the Cosmetic Products Group Standard.

### The rules

The Graphic Materials Group Standard sets limits on the maximum amount of leachable toxic materials that can be present in any graphics material.

Two sets of limits apply to the Graphic Materials Group Standard (Table 1). One limit applies to finger paints and the other covers the remaining products that fall under this standard.

Finger paints are easily ingested by children so the allowable level of some of the materials is lower.

### Definition of graphics materials

The Graphic Materials Group Standard defines a graphic material as a material which is deposited onto another material by a graphics instrument including fingers and hands for the purpose of writing, drawing, painting or marking.

Materials covered by this standard include, but are not limited to, crayons, water colour paints, finger paints, pastels, chalk, coloured pencils, and felt tip pens.

*Note: Graphics materials which do not fit under the scope of this group standard may instead be covered by one of the Surface Coatings and Colourants Group Standards. See [www.epa.govt.nz](http://www.epa.govt.nz) for more details.*

Children's graphic materials must not contain levels of these materials above those listed in Table 1.

Additionally, graphic materials approved under the Graphics Material Group Standard must not have any hazardous property other than an ecotoxic classification.

**Table 1. Maximum amount of leachable toxic materials in milligrams per kilogram (mg/kg) of graphics material.**

Metal	Finger paint mg/kg	Other graphics materials mg/kg
Antimony	60	60
Arsenic	25	25
Barium	250	1000
Cadmium	50	75
Chromium	25	60
Lead	90	90
Mercury	25	60
Selenium	500	500

## Manufacturer/importer responsibilities

### Get your products tested

To make sure the graphic materials you import or manufacture don't contain leachable levels over those set out in Table 1, you must have your products tested by an accredited laboratory.

In New Zealand, laboratories are accredited by International Accreditation New Zealand (IANZ), who can provide you with contact details of accredited laboratories ([www.ianz.govt.nz](http://www.ianz.govt.nz)).

Substances imported into New Zealand can be tested by overseas laboratories that are accredited by a body recognised by IANZ.

### Send your test results to the EPA

Test results for graphics materials that are intended for use by children must be submitted to the Environmental Protection Authority (EPA) ([GraphicMaterials@epa.govt.nz](mailto:GraphicMaterials@epa.govt.nz)) who will confirm whether the substance complies with the standard. The New Zealand Customs Service will not release imported substances until they receive confirmation that the substance complies.

You do not have to test every batch of a substance. If a previous batch has been tested and shown to comply, you can provide these results to the EPA.

A new test will be required if the manufacturing process has changed, if there is a change to the formulation or if the supplier of the raw ingredients of your substance have changed.

It is expected that accredited laboratories will select appropriate test methodology. The Environmental Protection Authority considers that acceptable test methods will include those specified in the European Standard EN71-3 or the Australian/New Zealand Standard AS/NZS ISO 8124.3:2003.

### Provide additional information to the EPA

If you are importing graphics materials, you will also need to submit a full Bill of Lading and commercial invoice to the EPA, along with the test results.

For graphics materials that have been tested overseas, you will also need to obtain confirmation from IANZ that they accept the test reports, and provide this to the EPA. For more information about this, see [www.ianz.govt.nz/services/importers/](http://www.ianz.govt.nz/services/importers/).



## Retailer responsibilities

You need to satisfy yourself that any substance you sell complies with the Graphic Materials Group Standard. Ask the distributor or importer of the substance if it has been tested in an accredited laboratory and been found to comply with the standard. If the distributor or importer is unable to confirm this, you must not buy it for onward sale.

### Contact us at the EPA

[GraphicMaterials@epa.govt.nz](mailto:GraphicMaterials@epa.govt.nz)

Hazardous Substances helpline:  
**0800 HAZSUBS (0800 429 7827)**

[www.epa.govt.nz](http://www.epa.govt.nz)