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Chemicals, Bioeconomy, Retail
F2. Bioeconomy, Chemicals & Cosmetics

EXPERT GROUP ON TOY SAFETY

Document number:	EXP/2025/002 Rev1
Date:	6 February 2026

SUBJECT: Revised guidance document No 21 on the classification of trampolines.
and replies to comments from the Expert Group

ACTION: For **endorsement** by Expert Group on Toy Safety. Please send **final comments, if any, by 9 March 2026. Silence means consent.**

Message

Please find overleaf the revised version of guidance document No 21 on the classification of trampolines, following the discussion in the meeting of the Expert Group on Toy Safety on 7 October 2025 and the comments received after that meeting, that we have addressed in the document after re-discussion in the ADCO Working Group on trampolines.

Given the substantial agreement on the text during the Expert Group meeting in October, this revised version will be considered as endorsed by the Expert Group in the absence of any final comments by the deadline of 9 March 2026 and, after that date, it will be published on the Europa website dedicated to guidance on toy safety.

February
September 2025

GUIDANCE DOCUMENT No 21 ON THE APPLICATION OF DIRECTIVE 2009/48/EC ON THE SAFETY OF TOYS Trampolines

This Guidance document is a **non-binding** document intended to provide guidelines to help Member States and stakeholders making the distinction between trampolines that are classified as toys and trampolines that are not classified as toys. It expresses the views of the majority of members in the Expert Group on Toy Safety¹.

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The images appearing in this document constitute examples intended to facilitate the decision-making. They do not presuppose the conformity of the represented products.

This Guidance document does not relieve national authorities from their obligation to determine for any individual product, on a case-by-case basis, whether it falls within the scope of application of the Toy Safety Directive 2009/48/EC or within the scope of application of other sectoral legislation. The Court of Justice of the European Union has repeatedly held that the national authorities, acting under the supervision of the courts, must proceed on a case-by-case basis, taking account of all the characteristics of the product. Therefore, this document shall not 'prescribe' which regulatory framework applies. Rather, it shall serve as one out of many elements supporting the national competent authorities in their case-by-case decision on individual products. In particular, this Guidance document does not prevent a national authority from consulting with colleagues from other regulated sectors concerned in order to reach a complete view on all aspects related to a given product. This guidance document (including its classification criteria) is not meant to affect products already placed on the market before the revised document has been published on the Europa website.

Following the recent adoption and publication of Regulation (EU) 2025/2509 of the European Parliament and of the Council of 26 November 2025 on the safety of toys² (TSR) repealing Directive 2009/48/EC, this guidance document will be updated once the TSR will be applicable in mid 2030.

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¹ The views expressed in this document are not legally binding; only the Court of Justice of the European Union can give an authoritative interpretation of Union law.

² Regulation (EU) 2025/2509 of the European Parliament and of the Council of 26 November 2025 on the safety of toys and repealing Directive 2009/48/EC, OJ L, 2025/2509, 12.12.2025

1. Introduction

Only trampolines that are classified as toys are subject to the requirements of the Toy Safety Directive (TSD)

The Toy Safety Directive 2009/48/EC does not define (toy) trampolines, nor mention them anywhere in the text.

The explanatory guidance document on the TSD mentions trampolines as examples of ‘activity toys’

The term “activity toy” is used in Annex II, part I, point 11 of the TSD which lays down a specific safety requirement for activity toys³. Annex V also foresees specific warnings for this category of toys (Annex V, part B, point 2⁴). Besides this specific requirement, activity toys also need to fulfil the other requirements of the TSD. Only activity toys meant for domestic use fall under the TSD. This is in line with the exclusion of playground equipment intended for public use from the scope of the Directive (Article 2 (2)). According to Article 3 point 21 of the Directive ‘The activity toys means a toy for domestic use in which the support structure remains stationary while the activity is taking place and which is intended for the performance by a child of any of the following activities: climbing, jumping, swinging, sliding, rocking, spinning, crawling and creeping, or any combination thereof’. ~~are intended for children to perform following activities: climbing, jumping, swinging, rocking, spinning, crawling or creeping, or combination of them.~~ The activity takes place in or on the toy. The support structure of the activity toy remains stationary while this activity takes place. However, trampolines, although being a category of activity toys, are excluded from the scope of EN 71-8:2018 ‘Activity toys for domestic use’ which covers other categories of activity toys.

Trampolines are covered by harmonized standard EN 71-14: Safety of toys — Part 14:

³ Activity toys shall be manufactured so as to reduce the risk of crushing or trapping of body parts or trapping of clothing and of falls, impacts and drowning as far as possible. In particular, any surface of such a toy accessible for one or more children to play on shall be designed to bear their load.

⁴ Activity toys shall bear the following warning:

‘Only for domestic use’.

Activity toys attached to a crossbeam as well as other activity toys, where appropriate, shall be accompanied by instructions drawing attention to the need to carry out checks and maintenance of the main parts (suspensions, fixings, anchorages, etc.) at intervals, and pointing out that, if these checks are not carried out, the toy may cause a fall or overturn.

Instructions must also be given as to the correct assembly of the toy, indicating those parts which can present a danger if incorrectly assembled. Specific information regarding a suitable surface on which to place the toy shall be given.

Kommentiert [AK1]: Correct header and number style throughout

Kommentiert [AL2R1]: Ok, done.

Kommentiert [AK3]: Is this sentence necessary?

Kommentiert [AL4R3]: Not necessary, but useful for the sake of clarity: the purpose of this guidance is to classify trampolines in order to identify the applicable legislation.

Kommentiert [AK5]: Correct paragraph spacing throughout

Kommentiert [AL6R5]: ok

Kommentiert [AK7]: Is it better to quote the TSD here?

Kommentiert [AL8R7]: TSD quoted.

Trampolines for domestic use, although such standard does not provide for a definition of trampolines either.

According to EN ISO 23659 Sports and recreational facilities – Trampoline parks – Safety requirements, trampolines are constructions consisting of a frame, impact attenuation, trampoline bed and suspension system ⁵

In Guidance document No 14 on sport equipment, trampolines for domestic use are classified as toys if they are for use in play by children under 14 years of age.

2. Criteria to classify a trampoline as toy

The definition of a toy provides the following criteria:

- Any product designed or intended
- whether or not exclusively
- for use in play
- by children of less than 14 years of age.

a) play value for children under 14 years of age

The main difficulty of this definition is the concept of “use in play” or “playing value”. Virtually, everything has playing value for a child, but this does not make every object fall into the definition of a toy. To be considered as a toy for the purpose of the Directive, the playing value has to be introduced in an intended way by the manufacturer. The fact that a product is intended for children under 14 years does not automatically render the product being a toy (e.g. children bicycles)

b) presence of a safety net (enclosure)

The presence of a safety net (enclosure) can be an indication that the trampoline could be classified as a toy and in some cases (for certain trampolines) having an enclosure is a requirement according to EN 71-14, although this criterion does not apply in all cases, for example where buried trampolines are installed in safe surroundings. However, having an enclosure does not automatically make a trampoline a toy.

c) domestic use (e.g. in a private garden)

Trampolines for domestic use in play by children of less than 14 years shall be classified as toys.

Other trampolines for domestic use (other than play) and trampolines for other than domestic use shall be classified as non-toys.

The size of the trampoline is no criterion for the classification as toy or non-toy.

3. Different categories of trampolines and applicable standards

Standard EN 71-14 currently covers most types of buried and non-buried trampolines for domestic use of all sizes, indoor and outdoor intended to be used as a toy.

It does not cover the following categories of trampolines:

⁵ Definition in the standard EN ISO 23659 Sports and recreational facilities – Trampoline parks – Safety requirements

Kommentiert [AK9]: Suggest we use the term in EN 71-14 “enclosure”.

Having an enclosure is a requirement of EN 71-4 for some trampolines. Perhaps this could be explained. It is still true that having an enclosure does not automatically make a trampoline a toy.

Kommentiert [AL10R9]: Wording suggested has been added in the text, however reference to the ‘safety net’ has been kept as more reader-friendly.

- Trampolines for gymnastics⁶: they are covered by standards EN 13219 Gymnastic equipment – Trampolines – Functional and safety requirements, test methods, and EN 913 Gymnastic equipment – General safety requirements and test methods;
- Trampoline parks⁷: they are covered by the standard EN ISO 23659 Sports and recreational facilities – Trampoline parks – Safety requirements;
- Floating inflatable trampolines for use in and on water⁸: they are covered by the standard EN ISO 25649-6 Floating leisure articles for use on and in the water – Part 6: Additional specific safety requirements and test methods for Class D devices;
- trampolines for public use as playground equipment – both indoor and outdoor.
- trampolines for rehabilitation purposes;
- inclined mat trampolines;
- fitness trampolines, including trampolines for medical use.

For those categories intended to be used as a toy but which are not covered, in whole or in part, by the scope of EN 71-14 any harmonised standard for toys, an EC-type examination is required⁹ to prove compliance with the safety requirements of the TSD.

[Annex 2 of ANEC's technical study on the classification of trampolines¹⁰ considers rebound limits (size, length and number of springs together with the type of bed) as an important factor for the safety of trampolines. Such rebound limits may be related with the size classification criteria in EN 71-14 standard. If a trampoline for domestic use present risks related to rebound that are not covered by standard EN 71-14, an EC-type examination is required for that trampoline]

4. Accessories for ~~safety issues with~~ trampolines

Safety issues have been identified by a market surveillance report in relation to trampolines sold on the market together with non-compliant accessories, which have been the object of recalls (e.g. basket balls and hoops, water sprinklers and bungycords sold together with trampolines). According to the warnings in EN 71-14, a trampoline shall not be used when

⁶ Covered by standards EN 13219 Gymnastic equipment - Trampolines - Functional and safety requirements, test methods, and EN 913 Gymnastic equipment – General safety requirements and test methods

⁷ Covered by standard EN ISO 23659 Sports and recreational facilities - Trampoline parks - Safety requirements

⁸ Covered by standard EN ISO 25649-6 Floating leisure articles for use on and in the water - Part 6: Additional specific safety requirements and test methods for Class D devices

⁹ <https://ec.europa.eu/docsroom/documents/34303>

¹⁰ <https://www.anec.eu/images/Publications/technical-studies/2020/ANEC-TS-2020-CHILD-SERVICES-002--Annex-2.pdf>

Kommentiert [AK11]: Hard to read, add full standard titles as a referenced footnote?

Kommentiert [AL12R11]: References to applicable standards moved to footnotes.

Kommentiert [AL13]: DK comments: we suggest to elaborate this

Kommentiert [AL14R13]: "Inclined mat trampolines" refers to two distinct types of products: large gymnastics incline mats (also known as "cheese mats" or "wedges") used as training aids, and mini fitness trampolines (rebounders) with an adjustable incline feature for more intense workouts". In both cases they are push or landing mats for competition trampolines, therefore not toys. As the reference for 'inclined mat trampoline' follows the listing provided by section 1 'Scope' of the standard EN 71-14, we think that further elaboration would be necessary only if there were doubts that such a product would be considered a toy, which clearly is not the case here. The WG therefore suggest not to add any additional explanation/definition, as not necessary.

Kommentiert [AK15]: Could this be elaborated with the scope of EN 71-14 : (...)

Kommentiert [AL16R15]: Reference to the scope of EN 71-14 added.

Kommentiert [AK17]: This also sounds like a safety requirement. Please elaborate the meaning of this paragraph.

Kommentiert [MG18R17]: SE- We think that this text should be moved to another heading and the purpose of presenting it in this document should be explained. This is n (...)

Kommentiert [AL19R17]: This information provided by ANEC has been added in this document because the rebou (...)

Kommentiert [AK20]: Is it normal to have this section in the guidance?

Kommentiert [MG21R20]: SE- We think that the heading should be amended into: "Accessories for trampolines"

Kommentiert [AL22R20]: Heading has been modified, as suggested, in order to focus on accessories for trampolines.

Kommentiert [AL23]: ANEC comments: the 1st sentence mentions 'a market surveillance report'. It would be usefu (...)

Kommentiert [AL24R23]: The reference to the market surveillance report was eventually removed by the WG.

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hat formatiert: Schriftart: Fett, Englisch (Irland)

Kommentiert [AK25]: Take care with this paragraph. Whilst all is sensible advice, it is not necessarily related to the categorisation as a toy or not.

Kommentiert [AL26R25]: This paragraph has been rephrased to focus on accessories for trampolines.

Kommentiert [AL27]: WG comments: We think that it is best to delete the reference to the report. The report is on (...)

~~wet. Therefore, trampolines should not be sold with a water sprinkler. Trampolines with additional features, e.g. tents or basketball hoops are excluded from the scope of EN 71-14. Therefore, an EC-type examination is required for any accessories for trampolines in these cases. There are no requirements in EN 71-14 for the hazards that an accessory, like a basket hoop or bungycords may expose to children, such as entrapment and hard obstacles. According to the warnings in EN 71-14, a trampoline shall not be used when wet. Therefore, trampolines should not be sold with a water sprinkler. When it comes to balls it is a hazard for children to land on a ball. There is knowledge of such accidents. The standard for trampoline parks (EN ISO 23659:2022) includes basket hoops in combination with trampolines if they fulfil safety requirements about entrapment and hard obstacles. Balls used on trampolines are required to be soft as follows: if any loose objects are used (e.g. balls) these should not pose risks of spraining when landed upon (e.g. use balls manufactured from a soft material).~~

5. Mandatory warnings for trampolines for domestic use

In order to ensure the safety of children, toy trampolines for domestic use of any size must carry the mandatory warnings of the standard EN 71-14.

~~Annex 2 of ANEC's technical study on the classification of trampolines⁺⁺ considers rebound limits (size, length and number of springs together with the type of bed) as an important factor for the safety of trampolines. Such rebound limits may be related with the size classification criteria in EN 71-14 standard.~~

Clear safety instructions, warnings on the risks and instructions for use also play an important role to ensure safety of trampolines.

⁺⁺ <https://www.anec.eu/images/Publications/technical-studies/2020/ANEC-TS-2020-CHILD-SERVICES-002-Annex-2.pdf>

Kommentiert [AL28]: This paragraph has been rephrased by the WG in order to make it more reader-friendly.

Kommentiert [AL29]: ANEC comments: The paragraph mentions that 'There is knowledge of such accidents'. It would be useful to know the source of these accidents (maybe also in a footnote).

Kommentiert [AL30R29]: WG comments: paragraph has been rephrased and such reference has been removed.

Kommentiert [AK31]: This is a requirement, and should not really be in this guide.

Kommentiert [AL32R31]: This reference has been deleted by the WG when rephrasing this paragraph..

Kommentiert [AL33]: WG comments: text should be deleted since this section should only focus on accessories. Balls are not accessories for trampolines. Since the use of loose objects are not mentioned in the standard nor the regulation, this is something new and that should not be mentioned only in a guide. It could be interpreted that it is ok with loose objects on a trampoline for domestic use. We should not encourage that.

Kommentiert [AL34]: ANEC comments: The 2nd part of the paragraph is a mix of two standards (EN 71-14 and EN ISO 23659) and of basket hoops and balls. For clarification and better understanding, we suggest to rewrite this part of the paragraph by grouping the sentences about basket hoops and the sentences about balls, clearly indicating which of the two standards is referred to.

Kommentiert [AL35R34]: WG: the paragraph has been rephrased by the WG so that it is more reader-friendly.

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Kommentiert [AK36]: This is a requirement of EN 71-14. Does this need repeating here?

Kommentiert [AL37R36]: It is also the purpose of guidance documents to highlight specific warnings for safety purposes.

Kommentiert [AK38]: This also sounds like a safety requirement. Please elaborate the meaning of this paragraph.

Kommentiert [MG39R38]: SE- We think that this text should be moved to another heading and the purpose of presenting it in this document should be explained. This is n...

Kommentiert [AL40R38]: This information provided by ANEC has been added in this document because the rebou...


Kommentiert [AK41]: This is a requirement of En 71-14 and does not need repeating.



Kommentiert [AL42R41]: It is also the purpose of guidance documents to highlight specific warnings for safety purposes

Kommentiert [MG43]: SE- We think there should be a new heading for this part: Mandatory warnings for trampolines for domestic use

Kommentiert [AL44R43]: New heading added.




5. Examples of different kinds of trampolines



	Toy? (Y/N)	Description	Criteria and applicable standard	Formatierte Tabelle								
<div>Small trampolines for domestic use</div> <div></div> <div>1 @hms (Housing and construction Authority Iceland)</div>	Y	<div>A small trampoline with a hand bar for added stability and balance. This trampoline is intended for children 10months and older. The hand bar is cushioned for a secure and comfortable grip, encouraging kids to hold on while they jump. Both for indoor and outdoor use.</div>	<div>Play value for children under 14 years of age</div> <div>Child-appealing</div> <div>For domestic use</div> <div>EN 71-14</div>	<div>Kommentiert [AL45]: DK comments: Two good examples of toy trampolines included.</div> <div>We suggest to add a few examples of fitness trampolines which are not toys, but which may have similar size and are also equipped with a similar hand bar. Hand bar is typically higher and colours and motives of the trampoline are not childish. Marketing and place of selling also has an influence.</div> <div>Example (picture can be copyright protected): https://www.mmaction.dk/mcu-sport-fitness-mini-trampolin-102-cm-m-n-handtag.html</div> <div>Kommentiert [AL46R45]: WG: No copyright-protected picture of similar small trampolines with a similar hand bar which are <u>not</u> toys could be provided by the participants to the WG and no pictures taken from the Internet can be used for the guidance document. However, the WG considers that the two cases of small (mini) toy trampolines (examples No 1 and 2) are sufficiently documented to highlight the play value and the characteristics that would help an MSA to take a decision.</div> <div>Kommentiert [AK47]: Could we use the terms “mini, medium and large” from EN 71-14?</div> <div>4.2 Trampoline categories</div> <div>Trampolines shall be classified by the size, height and n</div> <div>Table 1 — Trampoline size, height and</div> <table><tr><th></th><th>Mini</th></tr><tr><td>Frame size in mm</td><td>< 1 500</td></tr><tr><td>Frame height in mm</td><td>< 350</td></tr><tr><td>Maximum user weight in kg</td><td>25</td></tr></table> <div>The <i>frame size</i> for a circular trampoline is equal to trampolines it is equal to the maximum distance between the largest diagonal in the case of a rectangular trampol</div> <div>If at least one of the measurements in Table 1 is exce higher category.</div> <div>Kommentiert [AL48R47]: ‘Small’ is more reader-friendly than ‘mini’.</div> <div>Kommentiert [AK49]: Is this relevant?</div> <div>Kommentiert [AL50R49]: Deleted as not relevant.</div>		Mini	Frame size in mm	< 1 500	Frame height in mm	< 350	Maximum user weight in kg	25
	Mini											
Frame size in mm	< 1 500											
Frame height in mm	< 350											
Maximum user weight in kg	25											



 <p>2 @AGES</p>		<p>A small trampoline with a hand bar for added stability and balance. This trampoline is intended for younger children.</p>	<p>Play value for children under 14 years of age</p> <p>Very child-appealing</p> <p>For domestic use</p> <p>EN 71-14</p>	
<p>Trampolines for domestic use (non-buried)</p>  <p>3 @Hellenic Ministry for development</p>	<p>Y</p>	<p>They do not require a hole to be dug as part of the installation process With safety net</p>	<p>Play value for children under 14 years of age.</p> <p>For domestic use.</p> <p>EN 71-14</p>	

Kommentiert [AK51]: Text is no longer in line with image. Present in a separate row.

Kommentiert [AL52R51]: Text aligned to relevant image.



 <p>4 @BE</p>		<p>Round trampoline with safety net Diameter 183 cm; total height 195 cm For children > 6 years Maximum weight: 100 kg Sold in a toy store</p>	<p>Play value for children under 14 years of age. For domestic use. EN 71-14</p>
<p>Trampolines for domestic use (buried)</p>  <p>5 @North Trampoline</p>	Y	<p>Trampoline has to be buried. Product for use in play by children < 14 years, buried A buried trampoline with the frame level to the ground. Rectangular 460cm. Net height 195cm. From 3 years of age. Requires a hole to be dug for the frame and jumping space under the trampoline.</p>	<p>Play value for children under 14 years of age. For domestic use. EN 71-14</p>
<p>Raised buried trampolines</p>  <p>6 @North Trampoline</p>	Y	<p>They are buried toy trampolines with the frame levelled above the ground Round trampoline with diameter 430cm. Net height 195cm. Raised 25cm off the ground. A hole required to be dug under the trampoline for jumping space. Frame installed</p>	<p>Play value for children under 14 years of age. For domestic use. EN 71-14</p>

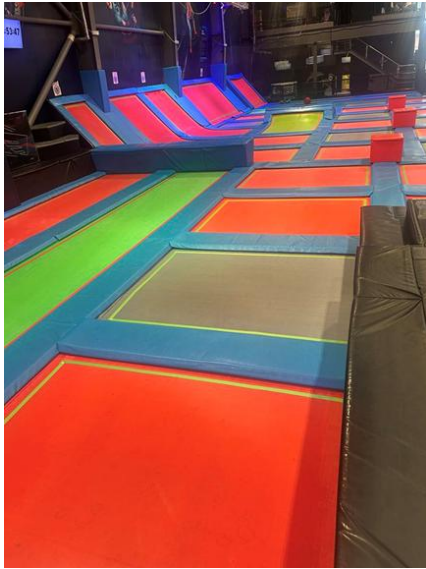
		above ground. From 3 years of age.	
Trampolines for gymnastics  7 @BE	N	Official competition trampoline. Dimensions: 520x305x115 cm (lxbxh).	No play value Intended for sport activities Not for domestic use
Trampolines for gymnastics  8 @hms (Housing and construction Authority Iceland)	N	This is a professional trampoline setup, commonly used for gymnastics or competitive trampoline sports. This trampoline provides a powerful rebound. The trampoline has a rectangular bed marked with a red cross in the center, which serves as a visual target for athletes to maintain control and alignment during jumps. The surrounding frame is equipped with blue safety mats to minimize injury risk.	No play value Intended for sport activities Not for domestic use

<p>Trampolines for gymnastics</p>  <p>9 @hms (Housing and construction Authority Iceland)</p>	N	<p>This is a long rectangular trampoline track, often referred to as a tumble track, used for gymnastics or acrobatics training. This trampoline provides a powerful rebound. The surface features a durable, perforated material with a central red guideline to assist athletes in maintaining a straight trajectory during their routines. The surrounding frame is equipped with blue safety mats to minimize injury risk. The setup is typical of a professional gymnasium or training facility.</p>	<p>No play value Intended for sport activities Not for domestic use</p>
<p>Trampolines for gymnastics</p>		<p>This is a mini trampoline or springboard, commonly used in gymnastics training or gymnasium at schools. This type of trampoline are usually used with a user run up/ before jumping at the trampoline. This</p>	<p>No play value Intended for sport activities Not for domestic use</p>

Kommentiert [AL53]: DK comments: The assessment is missing

Kommentiert [AL54R53]: The missing assessment (i.e. classification as non-toy) has been inserted.

	<p>trampoline provides a powerful rebound. The trampoline features a small, square jumping surface with a red cross in the center to help athletes aim and maintain control during use. The frame is equipped with blue mat for added safety. It is supported by a sturdy white metal base, which appears adjustable to modify its angle or height, making it versatile for different training purposes.</p>	
<p>10 @hms (Housing and Construction Authority Iceland)</p>		
<p>Trampolines for public use</p> 	<p>N</p> <p>Playground equipment Jumping surface: dimensions of the jumping mat: 250 x 150 cm. Total surface with border (in Length x Width): 310 x 210 cm. Description of how it is built: the jumping mat is made of plastic compounds and the border around it in rubber</p>	<p>EN 1176-1: 2017+A1:2023 Playground equipment and surfacing - Part 1: General safety requirements and test methods</p> <p>Play value but not for domestic use</p>
<p>11 @BE</p>		

		granulate. The frame + springs made of hot-dip galvanized steel	
Trampoline parks 	N	Trampoline park venue with multiple trampolines and/or trampoline courts. Trampoline parks are offered both stand-alone and in conjunction with other (active) leisure activities.	ISO 23659:2022 Sports and recreational facilities – Trampoline parks – Safety requirements Play value but not for domestic use

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@hms (Housing and Construction
authority of Iceland)