

STILL toying with children's safety.



....the UK government and online platforms are still not stopping the sale of dangerous toys to UK children. The British Toy and Hobby Association calls for the law to change.

INTRODUCTION

The British Toy and Hobby Association (BTHA) believes that online marketplaces should owe a duty of care to their customers to ensure that all toys that are available to purchase via their platforms are safe.

The BTHA has been reporting unacceptable levels of unsafe toys sold via third-party sellers on online marketplaces since September 2018¹ as part of its commitment to identify and stamp out the sale of unsafe toys. This report demonstrates that online marketplaces are hosting the sale of toys that do not comply with safety standards. It lays bare the ongoing levels of unsafe and non-compliant toys that continue to be allowed to be sold to unsuspecting UK consumers and shows that the situation is not improving.

Children in the UK are at risk of death and serious injury from the sale of unsafe toys via online marketplaces.

Consumers often believe they are buying from a trusted international retailer (the platform), when the reality can be very different. In fact, the sellers are third-party vendors, often based overseas, that ship direct, or via the online marketplaces' fulfilment channel. Consumers believe that somewhere in that process there will be checks on the products that are sold – but unlike traditional retail, this process has no, or very limited, oversight from the platform where the toys are listed, or the online marketplaces themselves.

The BTHA calls on the UK government to regulate these sellers and platforms before there is a fatality.

Natasha Crookes, Director of Public Affairs for the BTHA said, "It is not acceptable that unsafe and non-compliant toys are simply allowed to enter the UK market, putting children at risk of serious harm. We believe the government has to step in to legislate this wild-west of safety and we must see politicians from all sides of the house coming together to protect children as part of the UK review of the product safety framework in 2021."

The report;

- Identifies the latest levels of unsafe toys from a random selection purchased from third-party sellers on Amazon, eBay, Aliexpress and Wish.com
- Compares those figures to the past two reports and shows that there is an ongoing issue that needs addressing by legislation
- Lays out options for government to make regulatory changes to hold the platforms and sellers to account
- Calls on government not to rely on voluntary pledges from platforms, as they have not limited unsafe toys during the same period we have been testing.

Becca's Story

Last Christmas Sam McCarthy brought a present from a third-party seller on a well-known marketplace for her eldest son which nearly killed her 3-year old daughter, Rebecca.

Freddie, 10 got swept up in the magnetic ball craze and was absolutely thrilled to find three packets of them when he unwrapped his gifts on Christmas Day. But the festive fun quickly turned into a nightmare.

On the 28th January, Rebecca started to vomit and clutch her stomach repeating a word that the family had never heard her say before: "Owie." Her symptoms grew increasingly worse and she was rushed straight



into examination at her local hospital. X-rays were taken and to the family's horror, they revealed that 14 miniature magnets were lodged inside Rebecca's intestines. They had to be removed immediately and Rebecca was rushed to Royal London Hospital for emergency surgery.

Sam and her husband Steven, were warned that Rebecca could lose all or part of her intestines, depending on the damage caused. Sam says those two hours in surgery were the worst hours of their lives. They didn't know if Rebecca was going to survive.

Eventually the surgeon returned with a pot containing the 14 multi-coloured magnets that they had successfully removed from Rebecca's body. Those magnets had managed to burst through and rupture three parts of Rebecca's intestines. She was lucky to be alive.

But Rebecca is not fully out of the woods yet. Her scar tissue from surgery could tear and the family has been warned to closely watch out for any recurring sickness.

Sam says "I would hate for any other child to go through what Rebecca suffered because of buying dangerous toys via online marketplaces. The government needs to take action, the law urgently needs to change and online marketplaces need to be held accountable for the products they allow to be sold.

"That is why our family is committed to supporting the BTHA's campaign – to bring about tougher product safety laws for marketplace sellers and platforms before a child dies and many more are critically injured.



Electrical Safety First CEO, Lesley Rudd

"Electrical Safety First supports the BTHA call for change. Electrical Safety First has conducted a number of studies of electrical products over recent years.²

In one study we tested 15 products available on Amazon Marketplace, eBay and Wish.com in a specialist test laboratory. 14 out of 15 (that's over 90%) of the products purchased failed against UK safety standards and could have caused serious electric shock or fire.

Our investigations have also found electrical products listed on online marketplaces that had been recalled for safety reasons.

The BTHA report reflects our own findings; in their study 34 electronic toys had missing safety labelling, 14 failed temperature testing and could have caused burns or fires, 11 had easy access to coin batteries which can cause horrific injuries to children if swallowed, 10 gave access to internal parts which could give an electric shock.

The law needs to change to ensure that online platforms have responsibility for the safety of products that are offered for sale on their marketplaces."

Child Accident Prevention Trust (CAPT), CEO, Katrina Phillips

"We've grown increasingly worried that many toys sold through online marketplaces don't comply with UK safety standards. As consumers, we assume that online marketplaces are actively policing the safety of the products they sell. Unfortunately, that's not the case. What's more, the government has limited powers to force them to check if toys are safe or not.

That's why we really welcome the work that BTHA is doing to raise awareness and put forward potential solutions. We need everyone who sells toys to sell safe toys. Online marketplaces shouldn't be the exception to this rule."

¹ <https://www.btha.co.uk/wp-content/uploads/2021/09/Dont-toy-with-childrens-safety-Online-Marketplaces-Report-2020.pdf>
<https://www.btha.co.uk/wp-content/uploads/2021/09/Dont-toy-with-childrens-safety-Online-Marketplaces-Report-2019.pdf>

² <https://www.electricalsafetyfirst.org.uk/media/vvwdtpjo/online-marketplaces-the-evidence-and-impact.pdf>



THE RESULTS

The latest BTHA study, of third party sellers via online marketplaces, has found:



The resultant injuries that could have been caused by the unsafe and non-compliant toys identified ranged from choking and strangulation, damage to sight or hearing, burns, chemical poisoning and electric shocks, through to injuries that would need surgical intervention to remove coin cell batteries from a child's throat or high-powered magnets from a child's colon. A full list of the 255 products can be found in Appendix 1 and the top reasons for non-conformance are listed in Appendix 1.

Full results for the 255 toys tested in 2021;

2021 - 255 Toys Results		Assessment Results			Independent lab testing		Total		
Platform	Sample size	Illegal	Unsafe	Total Non-compliant	Tested	Failed Test	% Unsafe	% Non-compliant	Possible Counterfeit
Amazon Marketplace	77	24	41	65	60	41	53%	84%	0
eBay	80	23	39	62	57	39	48%	78%	0
AliExpress	80	46	34	80	56	34	43%	100%	0
Wish	18	10	8	18	11	8	44%	100%	0
Total	255	103	122	225	184	122	48%	88%	0

The Methodology

255 products were selected at random and purchased by a non-toy trade purchaser. Any type of toy could be selected, and the only guide was to get a wide range of types of toy. Counterfeit lines were not actively sought out and the brief to the purchaser asked them to search for more "generic", or unbranded types of toys. Third Party sellers were targeted in particular. On delivery toys were analysed based on the pack labelling. Toys displaying appropriate warnings, CE mark, item codes and EU addresses were determined as "compliant" and in most cases no further assessment was conducted. However for this project some seemingly compliant toys were sent for further testing.

Toys without the legally required labelling were determined as "illegal" and were assessed to establish what testing would be conducted. Due to having just one sample, tests were limited to one or two key checks and do not reflect a full compliance check. Testing was conducted by Bureau Veritas, an independent third-party test laboratory. Having completed our initial assessment, the results were verified by a panel made up of Trading Standards, laboratory representatives, non-member retailers, BTHA members and the BTHA's Toy Safety Advisor team.

Products were categorised as "Illegal" or "Unsafe" in the final report.

Illegal toys usually had technical non-compliances such as **missing conformity markings** and therefore did not comply with legal information requirements – this includes missing CE marks (note that missing UKCA marks have been ignored in this project even where mentioned in reports, due to Brexit transition period requirements). The conformity markings include missing traceability addresses which can be seen as minor but do prevent effective enforcement, tracing companies and effective recall.

Unsafe toys included those that were (in most cases) illegal and failed a test report plus those that stated warnings were missing in the report (see note 1), and those where the laboratory had tested the toy for 'ages over three years' incorrectly (see note 2). To be clear toys determined to be unsafe in this report failed independent testing against current UK toy safety regulations.

Note 1: Warnings – in some cases warnings are missing and this has not resulted in a failed test report. Our laboratory has confirmed *"In regards to the attached report and also the question relating to specific warnings / labels, if the issue found is solely in regards to packaging / warning labels it has always been our policy to still pass the toy if the toy itself passes all the physical safety checks and to call out the issues regarding missing or incomplete warnings so the client can rectify prior to the goods being sold. It would be the same approach should a client only submit a physical toy 'development' sample without finalised packaging, the toy itself could pass but the report would carry appropriate comments showing the labelling hadn't been assessed."*

However, this means that a serious age warning or identification of a hazard that is missing has not resulted in a fail report. Given that the toy was made available for sale in its non-compliant state, it is clear that no rectification of this omission has been carried out by the manufacturer. We would argue this is a serious issue that raises safety concerns for the children exposed to those toys as a result, and have included the toy in the unsafe list.

Note 2: Incorrect age determination – in some cases the laboratory has decided that despite the lack of a 3+ warning the toy should be tested to 'over three years'. This is without the laboratory having knowledge that a baby is used in the marketing of the toy. Where our verification panel disagree with this and feel there is a serious omission, this has been highlighted and the toy has been classified as unsafe.

IS THIS A NEW ISSUE?

No. We have shown over successive reports spanning three years and more than 500 toys that this is an ongoing problem that has not improved by the online marketplaces acting voluntarily, and will not be fixed without Government intervention.

Branded toys, and those bought directly from platforms acting as a retailer, were found to be compliant when tested in 2018. However, unbranded toys bought from third-party sellers via the online marketplaces were much more problematic and since 2018 the BTHA has accordingly focussed its testing on third-party seller toys. Of the selection of toys purchased from third-party sellers, i.e. all the independent sellers on an online marketplace platform, we found:

Individual Project Totals

Project	Sample size	Illegal	Unsafe	Total Non-compliant	Tested	Failed Test	% Unsafe	% Non-compliant	Possible Counterfeit
Project No.1	150	70	45	115	34	23	30%	77%	13
Project No.2	100	25	60	85	72	53	60%	85%	3
Project No.3	255	103	122	226	184	122	48%	88%	0
Total	505	198	227	425	290	198	45%	84%	16

More detailed figures are available for each project on request.

The results vary over the three years of testing but overall continue to show levels of non-compliance that should be unacceptable given that this concerns the safety of toys put in the hands of children. Overall 84% of the toys sampled at random have been determined to be illegal as they do not meet the safety and information requirements set out in UK legislation, and 45% have safety issues that could make them dangerous to play with by children.

Still on sale

59 toys have been recalled via the EU Safety Gate (RAPEX) from previous BTHA reports in 2019 and 2020. Those recalled lines were checked on each individual platform to identify seemingly identical lines that were still on sale. Lines that used exactly the same photographs and packaging were termed to be "seemingly identical" to the recalled lines. The BTHA accepts that these products could be a different model entirely or the manufacturer could of updated their product and made it compliant since the initial notification was issued.

Similar looking lines were not accepted into the list. For the list of products see Appendix 3.

As of 23.09.21

24 Amazon Marketplace recalled lines	12 can still be seen on sale	50%
14 AliExpress recalled lines	13 can still be seen on sale	93%
21 eBay recalled lines	16 can still be seen on sale	76%
59 toys recalled	41 seemingly identical on sale	69%

As of 23.09.21

39 toys have been added to the UK Product Safety Database and recalled so far from the 225 illegal toys identified. We expect significantly more over coming weeks.

LACK OF ACTION

The BTHA published its first report in June 2019, after work in 2018, and followed this with a second report in October 2020 to raise this issue with consumers, regulators and platforms but has been disappointed by the level of response.

While some platforms removed some of the identified products the BTHA reported, these (or identical products) are often relisted, by the original seller or by others. Seemingly identical items to the illegal and unsafe ones identified are still on sale across all platforms and little proactive work has apparently been done to prevent this relisting by the online marketplaces themselves. The volume of unsafe toys is so overwhelming that the platforms seem unable to remove them even on a reactive basis (see appendix 3 for a list of lines that have been recalled on the EU Safety Gate as a result of the BTHA projects but where seemingly identical items are still on sale) and so something else needs to change to ensure these products do not make their way to market in the first place. The BTHA believes there should be more pre-vetting, by the platforms, of both third-party sellers and their products, prior to them being placed for sale on online platforms.

Since the BTHA first started reporting issues, 60 toys have been recalled via the EU and UK safety alert systems but the BTHA purchaser has only received 19 notifications. The lack of notifications and contravenes the UK PAS 7100 Code of practice on consumer product safety related recalls and other corrective actions, which details the actions that are considered reasonable for companies to take in the event of a recall. These actions are simply not being undertaken effectively enough by the platforms. See the Crocodile Story in Appendix 4.

Despite the knowledge that illegal and unsafe toys are being placed in the UK market via online marketplaces, the lack of an adequate legal framework to prevent those unsafe toys being sold in the UK, and that unsafe toys are not being effectively removed from sale or recalled, there has been little activity at governmental level to address the issue or to make the legislative change necessary to hold these platforms to account for the products they allow to be sold and make money from. The BTHA acknowledges that, to some extent, the UK's framework for regulating economic operators has for a number of

years been harmonised with those of other countries in Europe by reason of the UK's membership of the European Union. However, following the UK's withdrawal from the European Union, and the end of the Brexit transition period, the Government now has more flexibility and opportunities to reform the UK's product safety legislative framework, and has started to create the space to investigate and act on this in 2021. This reflects the fact that the UK can now establish and control its framework for identifying and regulating economic operators, and has the opportunity to lead the way globally on legislating to take into account the role played by online marketplace platforms in modern commerce, as well as the products they give a shop window to. It is imperative that the UK uses the powers repatriated to it following its withdrawal from the European Union, and leads world governance on this issue by taking action given how important this sales channel is to consumers, and its growing prominence as shopping habits shift more online – in order to futureproof the safety of the products sold to UK consumers.

The BTHA is calling on government to take action now before a child dies.

Why is this happening?

- Online marketplaces are not currently recognised as economic operators in the UK regulatory framework, even when products are purchased and transactions completed via their platforms and fulfilment channels
- As a result, there is currently no legal requirement for online marketplaces to check the safety of the products that other sellers are listing on their sites
- Trading Standards Officers in the UK work hard to protect consumers but many third-party sellers are from overseas, outside UK enforcement boundaries
- UK consumers find it difficult to distinguish between products offered by the online marketplaces direct and those marketed and sold by third-party vendors, or to identify who the trusted sellers are in any event
- UK consumers find it difficult and expensive to take legal action against overseas sellers – if they can be traced at all – if there is an accident

When you buy a product from a retailer in the UK they have responsibilities, defined in the Toys (Safety) Regulations 2011 (the “Regulations”), to check (at the very least) that the manufacturer has made a safe toy or labelled it correctly, and to act should the product later be found to have a safety issue. Where the manufacturer is not based in the UK they must add their address details and take on the role of an importer under the Regulations, which has more detailed obligations. But online marketplace platforms are not classed as being either retailers or importers in the UK’s current economic operator model – simply the platform through which a sale is made. This is despite the customer data often being retained by the online marketplace, products marketed by the platforms’ optimisation software, and transactions often being completed through the platforms’ fulfilment channels. Instead it is the individual third-party seller on the platform that has the retailer responsibilities, but that could be the same person that made the product. In many cases no checks are being made whatsoever before the consumer receives the product, and in the case of toys, put in the hands of a young child (for more detail on the difference in responsibilities for traditional verses new models of supply see appendix 5) .

If a safety issue does occur after a product has come to market, Trading Standards officers are able to monitor and find unsafe items, and work with the retailer to remove them from sale. In cases where there is a danger they can also initiate a recall so consumers know they are unsafe and can return them. But many third-party sellers are based overseas, outside the jurisdiction of UK Trading Standards, and therefore unenforceable under UK law. It is too late for effective action to be taken only after the illegal and unsafe toys find their way into children’s hands and are identified.

Currently, online marketplaces that allow third-parties to sell products through their platforms have limited insight into, or incentive to monitor, the quality and safety of those products because of the current lack of legal accountability. Consequently, there are no systematic changes being made proactively, by Government or online marketplaces, to ensure unsafe products do not make it into the hands of children. Instead it is left to the platforms to voluntarily make changes – if they choose to do so (see appendix 6 for proactive checks made by online platforms). **The BTHA is urging the government to take action to protect children from the threat of physical harm by taking steps to prevent the sale of unsafe toys on online platforms, and by making the**

online marketplaces take some accountability for the products sold through their platforms by third-party sellers.

When third-party vendors sell to the consumer, they are responsible for the safety of the products. Third-party vendors can be any individual or company wishing to sell products via the online marketplace platform. Some third-party vendors act responsibly and are trusted brands. However, others are not and it can be difficult for consumers to know the difference and make informed choices about the risks. In some cases the sellers’ address and contact details are not clearly identified on the platform website / seller profile. In this scenario the online marketplaces generally do not accept that they have any legal obligation to check the safety of the items being sold by third-party sellers as they do not consider they are any of the ‘economic operators’ who have various duties to ensure compliance under the Regulations. Accordingly, online marketplaces are hosting the sale of toys that do not comply with UK safety standards, and making them available for sale in the UK, which in the absence of the online marketplaces may not have a route to market in the UK at all.

This situation is exacerbated by the online platforms not policing their own sites well enough and not having legal accountability for failing to do so, or for the unsafe and counterfeit products for sale on their platform. We note, for example, in its 2018 (page 22) annual report filed in the US, Amazon acknowledged they may be *“unable to prevent sellers in our stores or through other stores from selling unlawful, counterfeit, pirated, or stolen goods...”*³.

In addition, Trading Standards Officers are responsible for enforcing product safety in the UK and work diligently to do that. However, they can only enforce against regulations and against companies in the UK. The lack of regulation governing online platforms means Trading Standards officers cannot take action against the platforms; and often the third-party seller, that is regulated, is based overseas, so outside the jurisdiction of Trading Standards. In this common scenario there is no one in the UK to take action against.

Buyers can be left without the same level of consumer protection they should be entitled to and may believe they have when they shop on online marketplace platforms, and that they do have with other UK retailers. There may be no way of returning faulty, dangerous or counterfeit goods or of seeking compensation from the seller in the case of an injury.

Voluntary pledge

One solution that is being discussed is for platforms to voluntarily sign a pledge promising certain actions. However, the BTHA would like to see government going further, and legislating, for a number of reasons;

1. Only the platforms that sign the pledge are included. That means others that do not sign are making no commitment to trying to achieve ethical behaviour and the law is still not in place to deal with those platforms, or for restricting access to market for the products sold via those platforms.
2. Four large platforms have been signatories to a European Safety pledge since June 2018 – almost the same time we have been testing toys. The voluntary pledge has not stopped us finding unsafe toys on those platforms’ sites. If the pledge worked we would not be finding unacceptable levels of non-compliance and safety concerns.
3. The voluntary code does not commit to any pre-vetting of products or checks that other traditional retailers and importers have to undergo. It has no commitment for platforms to police their own sites.

Online marketplaces are aware of the problems. They are some of the most highly sophisticated and automated companies in the world, but unfortunately voluntary agreements, such as the European Safety Pledge and in-house solutions have not solved an ongoing problem. As the responsible toy sector, we are calling on the government to take steps now to ensure a child is not seriously hurt or killed by an unsafe toy (see appendix 7 for known incidents).

Government legislative solutions

The BTHA believes that online marketplaces should have a duty of care to their customers to ensure that toys that are available to purchase via their platforms are



³https://s2.q4cdn.com/299287126/files/doc_financials/annual/2018-Annual-Report.pdf

legal and safe, but that the existing legal framework does not accurately reflect the role they play in non-compliant and unsafe products being brought to market. The BTHA accordingly considers that legislation should be introduced to provide consumers with routes of redress that are clearly defined, and actionable in practice, in the event that harm is suffered as a result of illegal and/or unsafe toys purchased via an online marketplace.

In the BTHA's view, the most straightforward way to improve accountability for the products purchased on platforms would be to strengthen consumers' rights to bring private law actions against the online marketplaces that toys have been purchased from, and place the burden on pursuing enforcement actions against third-party sellers on the online marketplaces (i.e. rather than on consumers). Given the slow speed with which the online marketplaces have been willing to act to remove unsafe products, and the limitations in the voluntary remedial schemes they have established, it is considered that legislation will be required to effect meaningful changes in practice. This may be achieved in at least two different ways:

1. Implying through statute appropriate terms into the contracts/terms of use entered into between consumers and online marketplaces for the use of their platforms, similar to the statutory terms as to quality and fitness for purpose implied into contracts between consumers and traders by the Consumer Rights Act 2015; and/or
2. Establishing a statutory 'like claim' for consumers against online marketplaces as they have against the third-party seller of toys sold via the platform provided by the online marketplace, similar to the liability of credit card providers under section 75 of the Consumer Credit Act 1974.

It is envisaged that terms to be implied into contracts between consumers and the online marketplaces, which would not be able to be excluded⁴, ought to take the form of statutory warranties that products purchased via the platform are of satisfactory quality and are fit for purpose. This would provide consumers with a direct course of action against the online marketplace in the event that toys purchased are defective and/or unsafe, in the same way that section 19 of the Consumer Rights Act 2015 entitles consumers to reject goods, seek a refund, and/or bring a claim for damages against traders.

Under section 75 of the Consumer Credit Act 1974, a credit card provider will be jointly and severally liable to consumers for misrepresentation and/or breach of contract in respect of qualifying transactions for the purchase of goods using a credit card, along with the supplier of the goods. It is envisaged that legislation may strengthen consumers' rights by establishing a similar 'like claim' against online marketplaces such that they are fixed with joint and several liability (along with third-party sellers) for products purchased via their platforms. Consumers would therefore be able to pursue claims in contract against online marketplace platforms to recover damages, including for any non-pecuniary losses suffered as a direct result of the illegal and/or unsafe toy sold to them.

Neither of the above options would transfer sole liability for harms caused by defective or unsafe products to the online marketplaces as they may seek to join the third-party seller as a defendant in any proceedings and/or bring a contribution claim against the third-party seller, for example under the Civil Liability (Contribution) Act 1978. Additionally, any legislation in this area may include provision similar to section 75(2) of the Consumer Credit Act 1974 which provides that the supplier of goods shall indemnify the credit card provider for any liability it suffers as a result of the statutory 'like claim'. Such provision would ensure that the online marketplaces would have, and be able to enforce, claims against the third-party entities selling toys on their platform for any sums they are required to pay as a result of joint and several liability being imposed.

The effect of enhancing consumers' rights to bring private law actions against the online marketplaces for toys purchased via their platforms would be:

1. Consumers would be able to seek refunds and/or claim damages against an identifiable and contactable party that is economically active in the UK; and
2. The responsibility, and associated risk, for pursuing the liability of third-party sellers operating outside the UK and/or the EU will shift to the online marketplace on which the toys are marketed for sale.

Other mechanisms which may be considered in legislation to further strengthen consumer protections include imposing a contractual duty on online marketplaces to ensure that products sold via their platforms meet all applicable regulatory requirements,

introduce a minimum compensatory payment for breach irrespective of consumers' ability to prove loss, and/or provide for third-party enforcement (e.g. by a specified regulatory body) which may be exercised in circumstances where low value losses are suffered but by a large quantity of consumers.

The BTHA considers that the above approaches represent a reasonable balance between the protection of consumers from harm suffered as a result of non-compliant and/or unsafe toys, and the avoidance of unjustified interference with the platform services offered by online marketplaces. It is noted in this regard that by imposing liability on the online marketplaces, the measures set out above would require them to do no more than is currently expected of consumers to enforce their rights against third-party sellers. The online marketplaces are however significantly better placed than consumers to take such action to enforce their rights given the resources available to them, and their pre-existing commercial arrangements with the third-party sellers. It is fair to shift the enforcement burden on to the online marketplaces in light of the use of their platforms being indispensable for the third-party sellers to bring the defective and/or unsafe products to the UK market and the revenue they generate from those sales.

The BTHA also anticipates that shifting the enforcement burden on to the online marketplaces in this way will promote better regulatory practices within the market by strongly incentivising the online marketplaces to proactively vet the third-party sellers that are permitted to supply goods via their platforms, and to more carefully monitor the products that are offered for sale on their platforms (and promptly withdraw products which are shown to be defective and/or unsafe), ideally before the point of sale.

Regulatory action

In addition to liability for harm suffered as a result of non-compliant and/or unsafe toys purchased by online marketplace platforms, the BTHA also considers there is scope for the powers of the Office for Product Safety & Standards (OPSS) to be widened. This may include powers to issue legally binding, but specific obligations to online marketplaces to engage in such monitoring or

fact-finding in respect of toys offered for sale on their platforms as is appropriate in light of reports of breaches made to the OPSS. This is particularly important given the current situation disincentivises platforms from conducting their own sampling and testing, as they need to be unaware of issues to remain a passive entity to have safe harbour provisions under the European Ecommerce directive. Should that provision be removed under UK legislation, now that the UK has withdrawn from the European Union and the transition period has come to an end, the OPSS could require more active monitoring by the platforms.

Further, should legislation be introduced to impose joint and several liability on online marketplaces for goods sold via their platforms (as proposed above), the BTHA considers that it would be appropriate for the OPSS to be empowered to take representative enforcement action against the online marketplaces on behalf of classes of consumers who have suffered harm or losses in consequence of defective and/or unsafe toys purchased via a platform, similar to the redress mechanisms provided in 'opt-out' collective actions for infringement of competition law. Such powers for the OPSS will be essential to ensure that online marketplaces' liability to consumers is enforced in circumstances where the losses suffered by individual consumers are relatively low, and therefore uneconomical to pursue, but the volume of potential claims is significant.

International concerns

The BTHA would also urge the government to ensure that all trade agreements uphold UK consumer protections. That includes ensuring new conditions are not established in trade agreements which would give safe harbour provisions for online platforms and ensuring the UK is able to update and uphold its sovereign right to establish legislation in line with changing routes of supply to protect consumers.

⁴<https://ir.aboutamazon.com/static-files/0f9e36b1-7e1e-4b52-be17-145dc9d8b5ec>

THE BENEFIT OF REGULATORY CHANGE

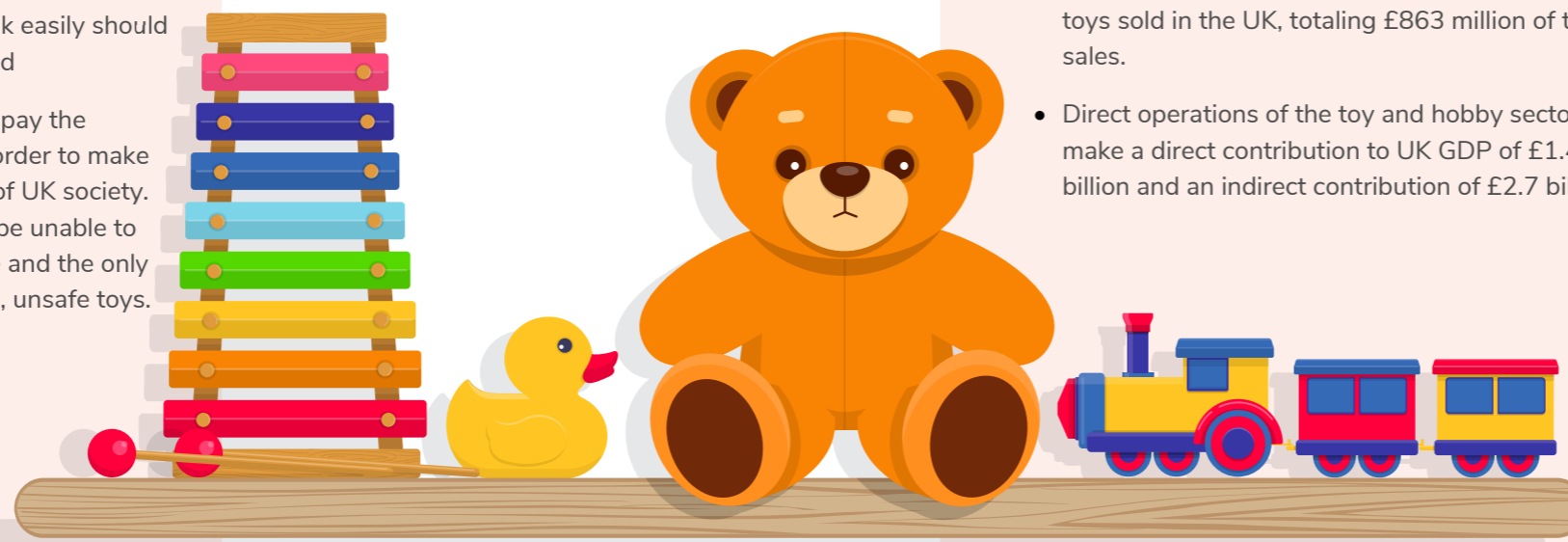
- Tackling the risk of serious physical harm (or fatality) to children (and their parents) posed by the prevalence of unsafe, non-compliant toys online;
- Alleviating the competitive disadvantage faced by British toy firms which manufacture and sell toys in compliance with existing regulatory standards;
- Returning approx. £400 million of toy sales revenue to the economy, currently lost to counterfeit sales each year;
- Returning significantly more revenue each year by removing illegal and unsafe toys from the market (our estimate is that this could be worth up to £850 million to the UK economy if the illegal traders are removed);
- Removing non-compliant and unsustainable toy waste from the supply chain and the waste stream;
- Enhancing Britain's reputation for high safety standards;
- Highlighting the UK government as a world leader, taking action on an issue which is a problem across the globe;
- Using new sovereign powers by demonstrating and exercising the regulatory freedom and control available to the UK, in a way which increases the protections available to its citizens, now that it has left the European Union;
- Cutting down on waste - reputable toy companies make toys that are designed to last and to bring years of play and development to a child – they are far from single use. At a time when we are all aware of environmental concerns the sale of cheap toys that break easily should be removed from the UK marketplace; and
- Ensuring companies that trade in the UK pay the proportionate level of corporation tax in order to make a fundamental contribution to the fabric of UK society. Without intervention UK companies will be unable to compete and will not exist into the future and the only option for consumers will be unregulated, unsafe toys.

Action

The BTHA has tips to help keep consumers safe until the law changes - go to page 79.

The problem is compounded as consumers are often not aware who they are in fact purchasing products from, or of the safety risks they are taking when buying products from third-party vendors via the use of online marketplaces. Action is also required to educate consumers of the risks of buying from third-party sellers on online marketplaces such as Amazon, Aliexpress, eBay, and Wish.com among the many other online marketplaces that provide a platform for the sale of third-party products.

We have tips for consumers to use when they are buying from a marketplace and the BTHA is calling on politicians, media outlets and consumers to come together to raise awareness of the concern we have collectively for the safety of children in the UK. We do not believe parents in the UK should be responsible for understanding complex toy safety regulation. They should be able to buy from any entity in the UK, safe in the knowledge that their children can enjoy safe play.



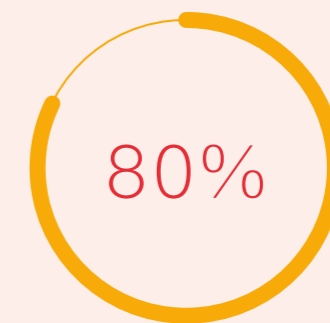
ABOUT THE BTHA

- Founded in 1944, the British Toy & Hobby Association (BTHA) is the official organisation representing toy manufacturers. The BTHA's members range from large international toy firms to small family-run businesses.
- Membership of the British Toy & Hobby Association shows the member's commitment to adhere to the BTHA Code of Practice under the umbrella of the Lion Mark which includes rules covering ethical and safe manufacture of toys, toy safety, a ban on counterfeit goods, an assurance to market responsibly, a commitment to improving sustainability and a desire to promote the value of all play through support of the Make Time 2 Play campaign.
- Members of the BTHA have access to a safety service to help them comply with the extensive safety regulations that ensure toys are safe to play with. That safety service is run by a number of toy safety professionals with many years of experience of toy compliance between them with specialist knowledge across the industry including areas such as mechanical, physical, toxicological and internet connectivity. In addition, the BTHA works with specialists from outside the BTHA on behalf of members, particularly with testing laboratories when needing to verify test results.
- The BTHA also administers the Toy Trust - the industry's charity – and runs the Toy Fair, the largest dedicated toy trade event in the UK.

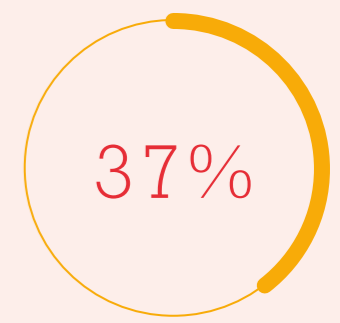
ABOUT THE TOY INDUSTRY

FIGURES FROM NPD

- The UK is currently the largest toy market in Europe, and fourth largest toy market worldwide, behind the United States, China and Japan.
- There were more than 32,000 new toys launched by reputable companies in 2019, that's 27% of the toys sold in the UK, totaling £863 million of total sales.
- Direct operations of the toy and hobby sector make a direct contribution to UK GDP of £1.4 billion and an indirect contribution of £2.7 billion.



The legitimate toy industry is worth £3.2 billion, with around 80% of the toy industry falling into the small to medium sized category.




Online sales of toys are increasing year on year and accounted for 37% of total toy sales last year.






APPENDIX 1: LIST OF TOYS BY PLATFORM




The following results came from products purchased between 16/12/2020 and 15/03/2021 and tested between late February 2021 and early May 2021.






AMAZON MARKETPLACE RESULTS

No	Toy Title as seen on Amazon	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on Amazon	Classification
1	ATOPDREAM Toys for 2 3 4 5 6 year old boys, Dinosaur Toys Gifts for 2-6 Year Old Boys Girls Toy Cars Boys Toys Age 2-8 Toy Dinosaurs Toys for Boys Kid	No address No warning No small parts within the toy Missing Conformity Markings Failed test report EN71-1	BV test report: (5421)040-0007A 24/2/21 EN71-1: FAIL 6 packaging flexible plastics EN71-1: noted missing labelling BV test report: (5421)040-0007A EN71-3: PASS		Unsafe
2	CubicFun Cars track Kids Toys for 4 year old boy girls, car adventure Toys for 3 year old intelligence Educational autism toys for 5 6 year old girls	No EU address Missing Conformity Markings	Not tested		Illegal
3	wgde toy cute Octopus Baby toys 0 3 6 9 12 18 months, double-sided flip soft reversible Octopus Plus stuffed Animals doll, Creative toys gifts for 0-3	No labelling except for CE mark Missing Conformity Markings Warnings - missing washing instructions	BV Test Report: (5421)040-0013A 15/2/21 EN71-1: PASS EN71-1: noted missing labelling address, UKCA mark, washing/cleaning instructions BV Test Report: (5421)040-0013B 15/2/21 AZO Dyes: PASS		Illegal



No	Toy Title as seen on Amazon	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on Amazon	Classification
4	Toys for 3 year old girls boys buidling blocks Baby Flower Garden Building Toy Floral Arrangement Playset 98 pcs	No EU address Missing Conformity Markings Failed test report EN71-1	BV Test Report: (5421)040-0034A 12/2/21 EN71-1: FAIL 4. General requirements 4.9 Protruding parts / puncture hazard EN71-1: noted labelling to be modified - UK address / UKCA mark		Unsafe
5	HERSITY Kids Pet Care Playset Dog grooming toy with Carry Case Costume Dress up Role play set gifts for children	Compliant Failed test report EN71-1	BV Test Report: (5421)040-0029A 15/2/21 EN71-1: FAIL 5.1 General requirements - generated small parts EN71-1: noted missing labelling no UK address or UKCA mark		Unsafe
6	Musical Caterpillar Toy, LIGHTDESIRE (Newest)Rattle with ring Bell for Preschool Baby	No EU address Missing Conformity Markings Warnings - missing washing instructions	BV Test Report: (5421)040-0038A 15/2/21 EN71-1: PASS EN71-1: noted missing labelling EU address, UKCA mark, washing/cleaning instructions, type, batch number		Illegal
7	Baby Bath Toys- Wind up Turtle Bathtub Toys,Toy for babies 6-12 months Floating Swimming Turtles for Boys Girls,Baby Shower Bathtime Fun Pool Toys for Toddlers,Gift for 1 2 3 4 Year Old Boys Girls	No address No label - CE mark on toy Missing Conformity Markings Failed test report EN71-1	BV Test Report: (5421)040-0042A 12/2/21 EN71-1: FAIL 4.10.2 Driving mechanisms 5. General requirements - small parts generated 6. Packaging flexible plastics EN71-1: noted missing labelling address, batch/model number, UKCA mark		Unsafe





No	Toy Title as seen on Amazon	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on Amazon	Classification
8	WEARXI Baby Bath Toys Fun Bathtub Shooting Game for Kids, Toddler Basketball Hoop Gift Set, Bath Toys for Boys and Girls 1-4 Years Old Boys included 3 Mini Basketball	No address - although possible scan code could show this. CE mark is covered by sticker 3+ marked but back photos show baby seemingly under 3yrs Missing Conformity Markings Warnings - contradictory 3+ warnings and baby marketing Failed test report EN71-1	BV Test Report: (5421)040-0039A 12/2/21 EN71-1: FAIL 5. General requirements - small parts generated 5.4 cords and chains 5.4.4 fixed loops, tangled loops and nooses EN71-1: noted missing labelling address, UKCA mark, CE hidden		Unsafe
9	FGWAF Gift Cute Astronaut Soft Plush Toy with Sound for Kids and Game Fans Crewmate - Best Gifts (10cm)	No address Missing Conformity Markings	Not tested		Illegal
10	FGWAF Gift Children LED Rechargeable Music Phone - Best Educational Toy	No address Missing Conformity Markings Warnings - missing EN62115 warnings Failed test report EN762115	BV Test Report: (5421)041-0011A 19/2/21 EN62115: FAIL 9.4 bridged insulation 9.9 temperatures rises 9.9 working requirements 13 strength of enclosures 14.7 accessibility of batteries 7. missing labelling		Unsafe
11	TEMI Carrier-Truck Transport-Car Play-Vehicles Toys - 5 in 1 Friction Power Set w/ Real Siren Sound & Bright Flashing Light, Push and Go Play Vehicles Toys w/ Mini Cartoon Bus/ Taxi/Airplane	No address Missing Conformity Markings	Not tested		Illegal
12	WELLXUNK Wooden Blocks,12 Pieces Wooden Magic Cube Face Emoji,50 Cards Wooden Magic Cube Face Pattern,Thinking Training Children Face-Changing Puzzle Building Cubes Interactive Toy	No address No CE mark Warning - incorrect format no small parts within the toy Missing Conformity Markings	BV Test report: (5421)040-0015A 24/2/21 EN71-1: PASS EN71-3: PASS EN71-1: noted missing labelling address, CE/UKCA mark		Illegal





No	Toy Title as seen on Amazon	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on Amazon	Classification
13	lcnw 85 Pack Balance Math Game Early Education Toy Frog Balance Scale Mathematical Digital Addition Teaching Tool for Kids Family Table Gama to Learn Counting Numbers and Basic Math	No address Toy is labelled 18m + but also has 0-3 sign and warning. Small parts within the toy Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test Report: (5421)040-0031A 12/2/21 EN71-1: FAIL 6. packaging plastic sheeting EN71-1: noted missing labelling address, UKCA mark		Unsafe
14	E-More Erasable Doodle Book, Portable Kids' Writing Drawing Board Toy Double-Sided Sketchpad Painting Book with 12 Colored Erasable Pens for Kids Toddlers Boys Girls Age 2 3 4 5 6 7 8 Year Old	No address CE mark is too small No age, No 0-3 sign, No warning sign Small parts within the toy but no hazards / warnings labelling in place. (coloured pens with lids) Missing Conformity Markings Warnings - Inaccurate 3+ and small parts	BV Test Report: (5421)040-0036A 11/2/21 EN71-1: PASS EN71-1: noted missing labelling address, CE mark too small, no UKCA mark, specific warnings and hazards BV Test Report: (5421)040-0036B 11/2/21 BS7272-1: PASS BS7272-2: PASS		Illegal
15	Baztoy Flying Ball, Kids Toys Remote Control Helicopter Mini Drone Magic Infrared Induction RC Flying Toy Christmas Birthday Party Gifts for Boys Girls Children Teenager Indoor Outdoor Garden Game	Labelling in place but 0-8 warning sign instead of 0-3 (illegal use of 0-3 sign) Warnings - Inaccurate 3+ logo Failed test report EN62115	BV Test Report: (5421)040-0027A 19/2/21 EN62115: FAIL 5.15 Tension test at 70N 9.4 bridged insulation 9.9 temperature rise 9.9 working requirements 15.1 absence of contact with moving parts 14.6 accessibility of button cells and type R1 batteries (remote control) 5.15 drop test (remote control)		Unsafe





No	Toy Title as seen on Amazon	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on Amazon	Classification
16	Dancing Captain America Toy Robot Hand Model Dance Hero Doll with Music Light	Everything in place except battery information. Warnings - missing EN62115 warnings Failed test report EN62115	BV Test Report: (5421)062-0023A 11/3/21 EN62115: FAIL 5.15 drop test 9.4 presence of a short circuit 9.9 temperature rises 15.1 absence of contact with moving parts EN62115: missing labelling various		Unsafe
17	The New York Doll Collection 11 inch/28 cm Soft Body Boy Baby Doll in Gift Box - Doll Dummy Included - Toy Dolls for Boys and Toddlers, B168	No EU address 0-3 sign too small Missing Conformity Markings	BV Test Report: (5421)046-0009A 18/2/21 Phthalates: PASS		Illegal
18	Pack of 2 Forest Animals Panda Torch Projectors, Educational Toy, Bedtime Story Toy, Perfect Party Favor Stocking Fillers, Great Gift for Children Kids Boys Girls, 2 Themes - Clear 48 images	No address batteries but no instructions Likely to fail EN62115 labelling requirements Missing Conformity Markings Warnings - missing EN62115 warnings	Not tested		Illegal
19	Baby Xylophone Instrument w/ Play Blocks – Pull 'n Play Xylophone Baby Toy – Supports Imaginative Play, Great Toddler Musical Instruments Gift for Kids 3 Year and Older	No EU address No 0-3 sign String holding beater is 38cm Missing Conformity Markings Warnings - missing acoustics warning Failed test report EN71-1	BV Test Report: (5421)046-0024A 17/2/21 EN71-1: FAIL 5. General requirements - small parts generated 5.4 Cords and chains 6. Packaging - plastic pkg thickness EN71-1: noted missing labelling UK address missing, UKCA mark, Acoustics warning		Unsafe
20	QUACOWW 9 Pieces 24 Links Wacky Tracks Fidget Toy Wacky Tracks Snap and Click Fidget Toys for Stress Relief Party Favors	Toy arrived in clear plastic bag with barcode. No labelling no small parts within the toy Missing Conformity Markings Failed test report EN71-1	BV Test Report: (5421)046-0023A 18/2/21 EN71-1: FAIL 6. packaging flexible plastics EN71-1: noted missing labelling all labelling missing		Unsafe

No	Toy Title as seen on Amazon	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on Amazon	Classification
21	Push pop pop Bubble Sensory Fidget Toy, Autism Special Needs Stress Reliever Toy Silicone Squeeze Toys with 2 Fidget Beans, Anti-Anxiety Tools for Kids and Adults (green-2)	Toy arrived in silver bag with barcode label. No labelling no small parts within the toy Missing Conformity Markings Failed test report EN71-1	BV Test Report: (5421)046-0022A 18/2/21 EN71-1: FAIL 6. packaging flexible plastics EN71-1: noted missing labelling All labelling missing BV Test Report: (5421)046-0022B 18/2/21 Phthalates: PASS		Unsafe
22	TALEEKEU Soft Plush Llama Alpaca Hug Pillow Cushion Fluffy Doll Kid Sofa Home Decor Toy (Pink alpaca)	Toy arrived vacuum packed in clear bag with label. No information on the label. No care label on toy. Cover detaches fully. Fluff detaches. Missing Conformity Markings	BV Test report: (5421)069-0006A 16/3/21 Azo Dyes: PASS		Illegal
23	RUIZHUO Wacky Tracks Fidget Toys Multicolor Snake Chain Puzzles Snap and Click Finger Sensory Simple Dimple Fidget Toy For Stress Relief Puzzle Educational Party Toys (3 Pcs)	Toy arrived in plastic bag with barcode inside Amazon box. No labelling. No small parts within the toy Missing Conformity Markings	Not tested		Illegal
24	RUIZHUO Wacky Tracks Fidget Toys Multicolor Snake Chain Puzzles Snap and Click Finger Sensory Simple Dimple Fidget Toy For Stress Relief Puzzle Educational Party Toys (3 Pcs)	Labelling in place but 0-3 sign but too small No warning signs No small parts Likely to fail EN62115 labelling requirements Warnings - EN62115 warnings missing	BV Test Report: (5421)046-0020A 23/2/21 EN62115: PASS EN62115: noted missing labelling retaining instructions, battery information.		Illegal





No	Toy Title as seen on Amazon	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on Amazon	Classification
25	Drill Design Puzzle Creative Toys, Scoolr Electric Drill Toy Set Educational Toys Building Blocks Pegboard Toy Construction Toy Set Take Apart Toys 3D Building Block Creative Puzzle DIY Set	No address Battery information in place Missing Conformity Markings	Not tested		Illegal
26	Mengonee Wolf Wolverine 3 Long Claws Plastic Action Figure Toys Cosplay Props Halloween	No address Missing Conformity Markings Failed test report EN71-1	BV test report:(5421)057- 0034A 4/3/21 EN71-1: FAIL 6. packaging flexible plastics EN71-1: noted missing labelling address, UKCA mark		Unsafe
27	JUMBO PRIMARY STRINGING BEAD SET by SHAWE with 30 Lacing Beads for Toddlers and Babie- Montessori Toys for Fine Motor Skills Autism OT- A Great Toy for Both Boys & Girls Ages 3+	No EU address No 0-3 sign Missing Conformity Markings	BV test report: (5421)046-0015A 17/2/21 EN71-1: PASS EN71-1: noted labelling to be modified - UK address, UKCA mark		Illegal
28	Hifot 16 Pairs Clip-on Earrings No Pierced Design Earrings Dress up Princess Jewelry Accessories for Girls Kids Toddler	0-3 sign too small Missing Conformity Markings Warnings - Inaccurate 3+ logo	Not tested		Illegal
29	Color Cute Cartoon Magnetic Clip On Stud Earrings for Teen Girls Women Party Wear Gift Set, Pack of 12 Pairs	Magnetic earrings Strong magnetic pull No information/No labelling Small parts within the toy but no hazards / warnings labelling in place Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test report: (5421)088-0021 1/4/21 EN71-1: FAIL 4 general requirements 4.23 magnetic flux (107 kG2mm2) EN71-1: noted missing labelling address, CE/UKCA mark, specific warnings and hazards		Unsafe





No	Toy Title as seen on Amazon	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on Amazon	Classification
30	Hot.Sale/JYC Color Random Boy Girl Learning Study Camera Children Take Photo Educational Toy	No address Small parts warning too small Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test report: (5421)062-0020A 8/3/21 EN71-1: FAIL 6 packaging flexible plastic EN71-1: noted missing labelling UK address, UKCA symbol, Warning to be modified, warning for age restriction and small parts - unreadable		Unsafe
31	HUYURI Electric Guitar Toy Musical Play for Kid Boy Girl Toddler Learning Electron Toy	No address No battery information No screw in battery compartment hole Long strap Likely to fail EN62115 labelling requirements Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test report: (5421)057-0029A 4/3/21 EN71-1: FAIL 5 toys intended for children under 36 months 5.1 general requirements - small parts generated 5.14 straps intended for around the neck 6 packaging flexible plastic EN71-1: noted missing labelling UK address, UKCA mark		Unsafe
32	Gifton - MYSTERY TOYS BOX - Gift for Boys Girls Kids - Fidgets, Sensory Stress Balls, Puzzles, Table Games, Brain Teasers, Magnetic Building Blocks, Torches, Cars and More (1 Box of 5 Toys)	Webpage only - no address Other labelling correct on box. Within the box were 5 small toys. Some labelled but squidgy toy no labelling. Small button cell car - not labelled. Small parts within the toy. Missing Conformity Markings	Not tested		Illegal
33	Noxus Magnetic pen Interesting combination toy Wonderful Magnetic Ballpoint Pen Fidget Toy Gift Stylus pen creative boy birthday present (Multicolour)	Toy arrived in plain tin. No labelling. Very strong magnets. Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test report: (5421)057-0028A 4/3/21 EN71-1: FAIL 4 general requirements 4.22 small balls to be modified 4.23 Magnets - small partsand magnetic flux (441.14 kG2mm2) EN71-1: missing labelling 7 all missing		Unsafe






No	Toy Title as seen on Amazon	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on Amazon	Classification
34	TOYANDONA Magnetic Bead Maze Puzzle Cute Monkey Shape Magnet Wooden Maze Game Toy Educational Toy for Kids Boys Girls Toddlers	Toy arrived in clear plastic bag with barcode label. No information No small parts Missing Conformity Markings Failed test report EN71-1	BV Test report: (5421)057-0023A 4/3/21 EN71-1: FAIL 4 general requirements - small parts generated 4.22 small balls to be modified 4.23 magnets (113.61 kG2mm2) 6 packaging flexible plastics EN71-1: noted missing labelling all labelling missing		Unsafe
35	Hysagtek 4 PCS Ballpoint Pen Novelty Cute Pizza & Bread Stick Magnet Ball Pens School Office Kids Toy Gift	The lids are small parts No 0-3 sign No warning sign Small parts within the toy but no hazards / warnings labelling in place Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV test report: (5421)057-0027A 4/3/21 EN71-1: FAIL 4 general requirements - small parts - magnet detached 4.23 magnets (137 kG2mm2) 6 packaging flexible plastics EN71-1: noted missing labelling EU/UK address, UKCA mark, specific warnings		Unsafe
36	3 In 1 Wooden Magnetic Fishing Board Games Montessori Toys for Kids Fine Motor Skills Toys Toddler Learning Educational Toys 3 4 5 Years Old with Magnet Poles and Clip (8 Magnetic Fish and 28 Bead)	EU address in place. No 0-3 sign No CE mark Choking warning incorrect format. Small parts within the toy Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test report: (5421)057-0020A 3/3/21 EN71-1: FAIL 4 general requirements - small parts magnet detaches 4.22 small balls to be modified 4.23 magnets (70.58 kG2mm2) EN71-1: noted missing labelling CE/UKCA mark, warnings		Unsafe
37	LEEHR Creative Magnetic Putty with Funny Monster Eyes for Children Kids Intelligent Exploitation Gift	0-6 sign instead of 0-3 and too small parts within the toy 2nd sample: same packaging but UKCA mark added - too small. Strong magnet Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV test report: (5421)057-0031A 4/3/21 EN71-1: FAIL 4 general requirements 4.23 magnets (1307.11 kG2mm2) EN71-1: noted missing labelling UK address, UKCA mark, small hazards warnings BV Test report: (5421)063-0016A 17/3/21 EN71-3: PASS		Unsafe

No	Toy Title as seen on Amazon	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on Amazon	Classification
38	6 packs Light up Boat Bath Toy Set, Flashing Color Changing Light in Water, Floating Rubber Bathbub Toys for Baby Toddler Infant Tub Play, Boy Girl Kid Growing Pal in Shower Bathroom or swimming pool	No battery information except for WEEE and RoHs sign. Button cell batteries but not accessible. No 0-3 sign No choking sign 3+ age grade - no small parts Warnings - missing EN62115 warnings	Not tested		Illegal
39	KingbeefLIU Children Science Bar Ring Horseshoe Compass Magnet Car Kit Experiment Tools A Fun Educational Toy	Toy arrived in clear plastic box with barcode labelling. Instruction leaflet inside in chinese. No information on packaging. No magnet warnings. Toy was broken inside. Small parts within toy. Small parts within the toy but no hazards / warnings labelling in place Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV test report: (5421)062-0026A 9/3/21 EN71-1: FAIL 4 general requirements 4.8 points and wires - sharp points 4.9 protruding parts - puncture hazard 4.23 magnets to be modified EN71-1: noted missing labelling address, CE/UKCA mark, specific hazards; magnetic information		Unsafe
40	HUALEDI Unicorn Toys Gifts Set, Unicorn Torch and Projector, [5 Pack] Unicorn Girls Accessories Toys , Girls gifts for age 2-3-4-5, Science toy for 1 2 3 4 5 6 year old	Toy arrived in clear plastic bag with barcode. No labelling Small parts within the toy No battery information Likely to fail EN62115 labelling requirements Missing Conformity Markings Warnings - Inaccurate 3+ and small parts, missing EN62115 warnings Failed test report EN71-1	BV test report: (5421)057-0024A 9/3/21 EN71-1: FAIL 6 packaging flexible plastics EN71-1: noted missing labelling address, CE/UKCA symbol, warnings BV test report: (5421)057-0024B 9/3/21 Phthalates: PASS		Unsafe
41	welltop Dinosaur Cars Toys, Dinosaur Toy Blaster for 2-9 Year Old Girls Boys Christmas Birthday Gifts Blue	No address Missing Conformity Markings	Not tested		Illegal



No	Toy Title as seen on Amazon	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on Amazon	Classification
42	Pretend Play Make up Set for Children, Non-toxic Kids Washable Makeup Set for Girls, Educational Learning Toys Cosmetic Tools Beauty Safety Toys Arrived Within 3-5 Days	No packaging. No labelling. Small parts within the toy but no hazards / warnings labelling in place. Missing Conformity Markings Warnings - Inaccurate 3+ and small parts	BV Test report: (5421)0077-0011A 22/3/21 EN71-1: PASS EN71-1: noted missing labelling address, CE/UKCA mark, specific warnings and hazards		Illegal
43	Zviku Kids airplane A380 toy plane self driving bump & go Airbus - Contains Beautiful 3D Light and Jet engine - Changes Direction On Contact - Great Gift toy for boys & girls age 2 - 8 years old	No address Barcode label on toy states age 2-8 years old but toy packaging is 3+ No battery information except WEEE Missing Conformity Markings Warnings - missing EN62115 warnings Failed test report EN62115	BV test report: (5421)062-0030A 10/3/21 EN62115: FAIL 5.15 drop test 9.4 presence of a short circuit 9.9 temperature rises / working requirements EN62115: missing labelling battery labelling		Unsafe
44	Baby Bath Toys 7 Pcs Shower Bath Baby Toy Bathtub Toy, Rainbow Waterwheel Water Game and Fishing Game for 2-5 Year Old Toddlers Kids, Fun Baby Bath Time Toy for Bathtub Swimming Pool(Colourful)	Compliant. UK address states Next Retail Ltd which when searched is a legitimate NEXT head office address. Age is 1-4 Failed test report EN71-1	BV Test Report: (5421)063-0013A 16/3/21 EN71-1: FAIL 5.1 general requirements - small parts generated 5.12 hemispheric shaped toys 5.13 suction cups 6 packaging - flexible plastics EN71-1: noted present/correct (CE mark instead of UKCA mark)		Unsafe
45	Coogam Wooden Watermelon Threading Toys Wood Block Puzzle Travel Game Early Learning Fine Motor Skills Montessori Educational Gift for Years Old Toddlers Baby Kids	CE mark too small 0-3 sign too small Warning sign too small? String 67cm Warnings - need modification Failed test report EN71-1	BV test report: (5421)062-0012A 11/3/21 EN71-1: FAIL 5.4 cords, chains, fixed loops, tangled loops EN71-1: noted labelling to be modified		Unsafe

No	Toy Title as seen on Amazon	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on Amazon	Classification
46	HCYH 60-150cm Giant Size Stuffed Crocodile Pillow Cushion Soft Plush Alligator Toys Big Crocodile Dolls Children Gift Girlfriend Gift Gray	Arrived in clear plastic bag. No labelling. Access to stuffing Missing Conformity Markings Failed test report EN71-1	BV Test Report: (5421)077-0047A 25/3/21 EN71-1: FAIL 5.1 General requirements - small part generated - zip puller 5.2 soft filled toys - access to stuffed material EN71-1: noted missing labelling address, CE/UKCA mark, cleaning instructions		Unsafe Seemingly Identical product Recalled on EU Safety Gate April 2020 INFO/00045/20
47	Anzmtosn Led Gloves, Light Up Gloves,Flashing Warm LED Skeleton Gloves Adult Kids for Birthday Christmas Halloween Club Party Supplies,Finger Light Toys	Toy arrived in clear plastic bag with barcode label CE mark too small No other labelling Toy came with 4 spare coin cell batteries Accessible coin cell batteries in glove cuff Small parts within the toy but no hazards / warnings labelling in place. Missing Conformity Markings Warnings - Inaccurate 3+ and small parts, missing EN62115 warnings Failed test report EN62115	BV test report: (5421)062-0015A 10/3/21 EN62115: FAIL 14.6 accessibility of button cells EN62115: missing labelling		Unsafe Seemingly Identical product Recalled on EU Safety Gate Nov 2019 A12/1636/19
48	Kid Building Blocks DIY Toys 170 PCS ,Early Educational Childhood Toys,KID Stacking Toys,Developing Early IQ for Kids,Learning Construction Assembly Toy Set,Preschool Toys for 1 2 3 4 5 Years Old Baby	Toy arrived in clear plastic bag No CE mark No age or warning (could be for < 3 year old) - baby advertising product No address Small parts within the toy but no hazards / warnings labelling in place. Missing Conformity Markings Warnings - Inaccurate 3+ and small parts	BV test report: (5421)062-0027A 10/3/21 EN71-1: PASS EN71-1: noted missing labelling address, CE/UKCA mark, warnings to be modified		Illegal
49	KEERADS Water Doodle Magic Mats, Baby Kid Fun 29 x 19cm Water Drawing Mat Board with Magic Water Pen Doodle Magic Canvas Toy Gift	No EU address 0-3 sign too small Warning incorrect format Toy generates small parts in pen nib 3+ but baby advertising product Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test report: (5421)077-0025A 29/3/21 EN71-1: FAIL 5 toys intended for under 3yrs 5.1 general requirements - small parts generated BV Test report: (5421)077-0025B 29/3/21 Phthalates: PASS		Unsafe

No	Toy Title as seen on Amazon	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on Amazon	Classification
50	pengyu- Novelty Toys for Kids LED Light Catapult Airplane Launcher DIY Glider Plane Kids Education Toy, Toy Gift for Children - Random Color	No address 0-6 sign instead of 0-3 sign CE mark No small parts/choking warning Missing Conformity Markings Warnings - specific hazards missing Failed test report EN71-1	BV Test report: (5421)077-0008A 25/3/21 EN71-1: FAIL 4.17 projectile toys kinetic energy (1.64J) 6 packaging flexible plastics EN71-1: noted missing labelling address, specific hazards		Unsafe
51	2-9 Year Old Boy, Hover Football Soccer Toys for 3 4 5 6 7 8 9 Year Old Boys Boy Toys Age 3-12 Birthday Present - Brand YKIO	No address Insufficient battery information no instructions Under 3 used for advertising (Seemingly identical packaging and toy from first Amazon project which was on RAPEX March 2020) Missing Conformity Markings Warnings - missing EN62115 warnings Failed test report EN62115	BV Test report: (5421)081-0042A 31/3/21 EN62115: FAIL 9.4 short circuit 9.9 temperature rises 13 mechanical strength of enclosures EN62115: some missing labelling		Unsafe Seemingly identical product Recalled on EU Safety Gate Feb 2020 A12/00359/20
52	Greatangle Fashion Party In The Tub Children's Bath Lamp Floating Lamp Bathtub Waterproof Colorful LED Lamp Toys Flashing Ice Cube random	Cubes arrived without packaging One shows a WEEE sign and made in China. No other information. Missing Conformity Markings Warnings - missing EN62115 warnings Failed test report EN62115	BV Test Report: (5421)077-0038A 26/3/21 EN62115: FAIL 13 mechanical strength of enclosures 14.6 access to button cell batteries 14.7 as above for under 3yrs 7 missing battery information		Unsafe
53	14 Pack Baby Rattles and Sensory Teething Play Toys for Newborns, Suitable for 0-6-12-18 Months Old, Can Be Cleaned at 100% High	Compliant EU address on accompanying Amazon packaging label Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test report: (5421)077-0009A 29/3/21 EN71-1: FAIL 4 general requirements 4.11 mouth actuated toys - generated small parts 5 toys intended for under 3yrs 5.1 general requirements - generated small parts 5.10 small balls		Unsafe

No	Toy Title as seen on Amazon	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on Amazon	Classification
54	dontdo Star Fairy Wand Kids LED Flashing Glow Stick Wand Five-pointed Toy Random Color	No address CE mark too small 0-3 sign too small button cell batteries - toy splits so potential to expose batteries Missing Conformity Markings Warnings - missing EN62115 warnings Failed test report EN62115	BV Test report: (5421)077-0024A 26/3/21 EN62115: FAIL 13 Mechanical strength of enclosures 14.6 accessibility to button cell batteries 7 missing battery information		Unsafe
55	Lictin Early Educational Music Toy - 4 in 1 Kid Musical Instruments Learning Piano Instruments Toys with Light Xylophone Phone Sound Toy Set for Baby	Compliant Insufficient battery information Warnings - missing EN62115 warnings Failed test report EN71-1	BV test report: (5421)063-0011A 10/3/21 EN71-1: FAIL 5.4 cords, chains 6 packaging flexible plastics EN71-1: noted missing labelling UK address, UKCA mark, acoustics warning		Unsafe
56	Water Spray Bath Toy Electric Induction Water Spray Toys Baby Bathing Playing Toy for Girls Boys (#1)	No address (battery information/instruction leaflet included) Missing Conformity Markings	Not tested		Illegal
57	EARSOON Baby Bath Toys Bath Shower Head - Electric Elephant Adjustable Shower Head Bathtub Sprinkler Spraying Water Toy for Baby Bathing Time Game 12+ Months	Compliant baby used in advertising Failed test report EN71-1	BV test report: (5421)062-0008A 9/3/21 EN71-1: FAIL 5.1 general requirements - small parts, detached on force 5.13 suction cups EN71-1: noted labelling CORRECT		Unsafe
58	Baby Bath Toy Shower Head Toy - Electric Duck Bathtub Water Spray Toy Water Games Adjustable Sprinkler Two Spraying Modes Birthday Gifts for Infants Toddlers 18 Months + (Only Stick on Smooth Surface)	Compliant EC Rep is UK address 18 months + on box but 0-3 sign insufficient battery information / no instructions (screwdriver came with toy) Failed test report EN71-1	BV test report: (5421)062-0029A 10/3/21 EN71-1: FAIL 5.8 shape and size of certain toys EN71-1: noted labelling CORRECT note re: graphical symbol not appropriate		Unsafe






No	Toy Title as seen on Amazon	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on Amazon	Classification
59	Hollow Teething Tubes(6.9" Long), Soft Silicone Teething Toys for Babies 0-12 Months, Four Color Silicone Stick Shape Teether Straw Toys with a Cleaning Brush for Sensory Exploration and Tooth Relief	No CE / UKCA mark (UK rep address in place) Missing Conformity Markings Failed test report EN71-1	BV test report: (5421)062-0014A 9/3/21 EN71-1: FAIL 5.8 shape and size of certain toys EN71-1: noted missing labelling CE/UKCA mark		Unsafe
60	LUKAT Baby Toys for 3 4 5 Year Old Boys & Girls, 4 in 1 Activity Cube Toddler Multifunctional Play Center with Ramp Track Musical Educational Toys for Toddler Toys Great Gift	Compliant Baby used in advertising, and babies referenced on toy box descriptions Inaccurate Conformity Markings Warnings - Inaccurate 3+ and baby marketing Failed test report EN71-1	BV test report: (5421)062-0009A 10/3/21 EN71-1: FAIL 4.2 assembly instructions to be modified 5.1 general requirements - small parts generated 5.10 small balls EN71-1: noted labelling to be modified; UK address, CE too small, UKCA mark		Unsafe
61	HAHAone Wooden Toys for 1 2 3 Year Old Boys and Girls, baby Montessori Toddler Fine Motor Skill Toy Shape Size Sorting Puzzle Preschool Developmental Toys for Kid's Early Learning Educational Games	Compliant labelling but the felt topping came away with easy pull creating small part. Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV test report: (5421)062-0013A 10/3/21 EN71-1: FAIL 5.1 general requirements - small parts generated 5.10 small balls EN71-1: noted labelling to be modified; UK address/UKCA mark		Unsafe
62	TOYSCOG Montessori Wooden Early learning Animal Shape Sorter Toy Gifts for 1 2 3 Year Old Boys Girls Children Toddlers Wooden Xylophone Pull Along Car	UK manufacturing address. 0-1 symbol instead of 0-3 No small parts within the toy Warnings - 0-1 age range incorrect and acoustics warning missing	BV Test Report: (5421)063-0020A 12/3/21 EN71-1: PASS EN71-1: noted missing labelling acoustics warning, UKCA mark		Illegal
63	Gxi Baby Phone Toy Early Educational Phone Toy Play and Learn for Children and Toddlers	CE mark too small Most battery information in place Inaccurate Conformity Markings	BV Test report: (5421)077-0018A 25/3/21 EN71-1: PASS EN71-1: noted modified labelling; Uk address missing, CE mark too small	100% Food Grade Silicone Non-toxic BPA free 	Illegal

No	Toy Title as seen on Amazon	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on Amazon	Classification
64	Arestory 3D Puzzle Cartoon Puzzle Jigsaw Puzzles for Grown Ups for Smart Kids and Adults Mini Educational Funny Toy Wooden Colorful Jigsaw Gift Challenging Fun Brain Game Jigsaw Floor Puzzle	No address. 0-3 and CE mark OK Choking warning not in English Small parts within the toy but no hazards / warnings labelling in place. Missing Conformity Markings Warnings - Inaccurate 3+ and small parts	Not tested		Illegal
65	Otosea Cute Cartoon Kids Toddler Backpack 1-3 Years Old, Soft Plush Animal Children's School Backpacks With Reins For Boys Girls (Rabbit)	Toy arrived in clear plastic bag with barcode label. CE mark too small Toy advertised for 1-3 year olds Zip and long straps Missing Conformity Markings Warnings - missing washing instructions Failed test report EN71-1	BV Test report: (5421)077-0041A 31/3/21 EN71-1: FAIL 6 packaging flexible plastics EN71-1: noted missing labelling address, CE mark modified, washing/ cleaning instructions BV Test report: (5421)077-0041B 31/3/21 Azo Dyes: PASS		Unsafe










EBAY RESULTS







No	Toy Title as seen on eBay	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on eBay	Classification
1	Creative Magic Drawing Board Children Toys Boys Girls Pen 3D Glasses	Compliant Set contains 3D glasses Failed test report EN71-1	BV Test Report: (5421)040-0028A 11/2/21 EN71-1: FAIL 4.14 Enclosures 4.14.2 Masks and helmets - glasses broke at force revealing elements that could enter eye EN71-1: noted labelling present & correct BV Test Report: (5421)040-0028B 11/2/21 - BS7272-1 & BS7272-2: PASS		Unsafe
2	AirFlow Art Drawing Set Stencil Pens Childrens Kids Creative Boys Girls Toysa	Compliant small parts within the toy - pen lids Failed test report EN71-1 & BS7272-2	BV Test Report: (5421)040-0035A 11/2/21 EN71-1: PASS EN71-1: noted labelling correct BV Test Report: (5421)040-0035B 11/2/21 BS7272-1: PASS BS7272-2: FAIL		Unsafe
3	Toys For Kids Gift Police Car LED Light Boys Cool Toy Push Back Open Door Cars	No address No screw for the battery compartment although screw hole available Missing Conformity Markings	BV test report: (5421)040-0033A 12/2/21 EN71-1: PASS EN71-1: noted missing labelling UK address, UKCA mark		Illegal
4	Musical Educational Animal Farm Piano Developmental Music Toys for Baby Kids	No labelling toy arrived without a box (Ebay does state that New could mean direct from Manufacturer and might not be in box),in bubble wrap with barcode label. No screw for the battery compartment although screw hole available. Missing Conformity Markings Warnings - missing EN62115 Failed test report EN762115	BV Test Report: (5421)041-0013A 16/2/21 EN62115: FAIL 9.9 temperature rises 9.9 Working requirements 13. Mechanical strength of enclosures 14.7 accessibility to batteries 7.1 missing labelling		Unsafe






No	Toy Title as seen on eBay	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on eBay	Classification
5	Sozzy 4pcs Rattle Set Baby Sensory Toys Foot-finder Socks Wrist Rattles Bracelet	No labelling toy arrived without a box (Ebay does state that New could mean direct from Manufacturer and might not be in box) in clear plastic bag. Care labels on each piece with CE mark and name of company Missing Conformity Markings	BV Test report: (5421)040-0041A 15/2/21 EN71-1: PASS EN71-1: noted missing labelling UK address, UKCA mark		Illegal
6	Baby Kids Knock Hit Hamster Game Cartoon Music Light Flash Educational Toys UK	Labelling on box in Chinese. No CE mark No address No warning sign No 0-3 sign No screw for the battery compartment although screw hole available Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test Report: (5421)041-0015A 15/2/21 EN71-1: FAIL 5. General requirements - small parts - various EN71-1: noted missing labelling address, CE mark not visible from outside, UKCA mark not present		Unsafe
7	Toys For Girls Kids Xmas Gift Music Dancing BEE Robot 2 3 4 5 6 7 Years Age Old	No address No battery info on box Missing Conformity Markings Warnings - missing EN62115 Failed test report EN62115	BV Test Report: (5421)040-0025A 22/2/21 EN62115: FAIL 9.4 bridged insulation 9.9 measurement of temp rise 9.9 working requirements 15.1 absence of contact with moving parts 7. Missing labelling		Unsafe
8	Toys For Girls Robot Dog Dancing Music 2 3 4 5 6 7 8 Year olds Age Xmas Gifts	No EU address (made in China - Very small writing looks like Aries Toys could be in Lima.) Missing Conformity Markings	Not tested		Illegal
9	Doll Baby Rattle Baby Toys Cute Decoration Infant Baby Rattle Bell Newborn UK	No address No CE mark 18months + on box Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test Report: (5421)040-0030A 15/2/21 EN71-1: FAIL 4.20 acoustics 4.20.2.6 rattles 5.1 general requirements - small parts generated 5.8 shape and size of certain toys 5.10 small balls EN71-1: noted missing labelling address, UKCA/CE mark		Unsafe






No	Toy Title as seen on eBay	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on eBay	Classification
10	UK Baby Foldable Wooden Play Activity Gym Stand Nursery Hanging Toys 3 Theething	No EU address length of hanging strings a concern Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test report: (5421)035-0009A 9/2/21 EN71-1: FAIL 4.2 assembling instructions 5.1 general requirements - small parts generated 5.4 fixed loops 5.8 shape and size EN71-1: noted labelling to be modified EU/UK address, UKCA mark		Unsafe
11	INFLATABLE BABY ROLLER CRAWLING ACTIVITY PLAY TOY MUSIC RATTLE SOUND UK SELLER	Compliant Failed test report Phthalates	BV Test report: (5421)040-0017A 15/2/21 Phthalates: FAIL		Unsafe
12	Soft Cloth Book Gift Interactive Books for Kids Baby Educational Learning Toys	No labelling Toy arrived in clear plastic bag with barcode label No CE mark No instructions - toy has ties to tie it to something. Missing Conformity Markings Warnings - missing washing instructions Failed test report EN71-1	BV Test Report: (5421)040-0037A 15/2/21 EN71-1: FAIL 6. packaging flexible plastics EN71-1: noted missing labelling UK address, UKCA mark, Washing/cleaning instructions		Unsafe
13	Children Kids Pretend Role Play Game Toys Baby Doll in Bath Tub Shower Set Gifts	Label on back of toy in Chinese. No CE mark No address No warning sign Toy pkg marked 3years + Small parts detach easily within the toy. Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1 & Phthalates	BV Test Report: (5421)040-0011A 22/2/21 EN71-1: FAIL 5.1 General requirements - small parts generated EN71-1: noted missing Labelling UK address, UKCA/CE mark BV Test Report: (5421)040-0011B 22/2/21 Phthalates: FAIL		Unsafe




No	Toy Title as seen on eBay	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on eBay	Classification
14	Wooden Construction Toolbox Kids Toy - Building Educational STEM Montessori Toy	No address warning incorrect format - no mention of small parts/choking hazards Missing Conformity Markings Warnings - Inaccurate 3+ and small parts	BV Test Report: (5421)040-0009A 24/2/21 EN71-1: PASS EN71-1: noted missing labelling UKCA mark, UK address, specific hazards; small parts/choking hazard EN71-3: PASS		Illegal
15	Truck Car Toy Take Apart DIY Pretend Play Set Assemble building Construction	No address Missing Conformity Markings	Not tested		Illegal
16	Wooden Memory Match Chess Game Kids Puzzle Montessori Educational Toys	No address No CE mark Missing Conformity Markings	BV Test Report: (5421)040-0032A 11/2/21 EN71-1: PASS EN71-1: noted missing labelling EU/UK address, UKCA/CE mark		Illegal
17	Children Room Wood Camera Decor Natural Safe Wooden Toy Painted Nursery Toys UK	No labelling. Toy arrived in bubblewrap with barcode Strap - no breakaway Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test Report: (5421)040-0040A 16/2/21 EN71-1: FAIL 5. General Requirements - small parts generated 5.14 Straps intended to be worn around the neck EN71-1: noted missing labelling UK address not present, UKCA symbol not present		Unsafe
18	Sensory LED Light up Handheld Colour changing Toy Special Needs Autism ASD ADHD Also called: Underwater LED light with Remote	Toy arrived in clear plastic bag. No labelling except instructions. States that light can be used in water. (Remote control not to be used in water) Missing Conformity Markings Warnings - missing EN62115 warnings Failed test report EN62115	BV Test Report: (5421)042-0021A 23/2/21 EN62115: FAIL 13 strength of enclosures (remote) 14.6 accessibility of button cells and type R1 batteries (remote) 7. missing labelling 11.1 moisture resistance for toys underwater 13 strength of enclosures		Unsafe

No	Toy Title as seen on eBay	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on eBay	Classification
19	6 in 1 Toddler Baby Boy Girl Drum Musical Toys Instruments Kids Band Kit Gift	<p>Labelling in Chinese No CE mark No 0-3 sign No warning sign long strap within toy/no breakaway Small parts within the toy but no hazards / warnings labelling in place.</p> <p>Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1</p>	<p>BV Test Report: (5421)042-0031A 17/2/21 EN71-1: FAIL 4.20 Acoustics, wind toys 5.1 General requirements - small parts 5.10 small balls 5.14 straps intended to be worn around the neck EN71-1: noted missing labelling UK address, UKCA symbol, acoustics warning</p>		Unsafe
20	68PCS Magnetic 3D Tiles Building Blocks Construction Toys For Kids Baby Gift UK	<p>No EU address</p> <p>Missing Conformity Markings Failed test report EN71-1</p>	<p>BV Test Report: (5421)042-0033A 16/2/21 EN71-1: FAIL 4.9 protruding parts - puncture hazard 6. packaging flexible plastics EN71-1: noted missing labelling UK address, CE mark not required drawing, UKCA mark</p>		Unsafe
21	Classic Cell Phone (This is not the descripton from Ebay. The listing was removed and the user no longer registered on Ebay. No further information from Ebay on this toy.	<p>Toy arrived in clear plastic bag. Label attached but information in Chinese. No CE mark No small parts within the toy</p> <p>Missing Conformity Markings</p>	<p>BV Test Report: (5421)042-0008A 18/2/21 PAH: point 50-Annex 17: PASS</p>		Illegal
22	Toys for Girl Flying Surprise Doll LED2 3 4 5 6 7 8 9 Year Old Age Xmas Gift	<p>No address infrared stated on box. Charging cable. No instructions. Helicopter blades very fast!</p> <p>Missing Conformity Markings Warnings - Flying toys warning missing</p>	<p>BV Test Report: (5421)042-0023A 16/2/21 EN71-1: PASS EN71-1: noted missing labelling UK address not present 7.25.1 Flying toys warning is missing</p>		Illegal




No	Toy Title as seen on eBay	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on eBay	Classification
23	Butterfly Rainbow Knife Balisong Steel Toy Trainer Practice Sports Training Toy	<p>Toy arrived in black pouch and box with no labelling. This is practise knife for doing tricks</p> <p>Missing Conformity Markings</p>	<p>BV Test Report: (5421)042-0024A 15/2/21 EN71-1: PASS EN71-1: noted missing labelling UK address not present, UKCA/CE mark, missing batch number</p>		Illegal
24	Children Girls Dancing Toy Battery Doll 10 Plays Music And Moves With Lights	<p>Compliant</p> <p>Missing Conformity Markings Failed test report Phthalates</p>	<p>BV Test Report: (5421)042-0010A 19/2/21 Phthalates: FAIL</p>		Unsafe
25	Kids For Girls Toys Electric watch Doll 2 3 4 5 6 7 8 9 Year Old Age Xmas Gift	<p>Received Mermaid torch and Projector instead of LOL watch (photo on ebay is not what was received) No address</p> <p>Missing Conformity Markings</p>	<p>Not tested</p>		Illegal
26	Creative Learning Educational Toys for Kids Age 3 4 5 6 7 8 Years Old Boys Girls	<p>No address No CE mark small parts within the toy but warnings in place</p> <p>Missing Conformity Markings</p>	<p>Not tested</p>		Illegal
27	480pcs Thorn Ball Clusters Bunchems Children Kids Craft Toy Gift Puzzle Set Tub	<p>Bunchems came in clear plastic box. No labelling. Small parts within the toy but no hazards / warnings labelling in place.</p> <p>Missing Conformity Markings Warnings - Inaccurate 3+ and small parts</p>	<p>BV Test Report: (5421)042-0028A 15/2/21 EN71-1: PASS EN71-1: noted missing labelling UK address, CE / UKCA mark , warnings to be modified as not visible from outside packaging</p>		Illegal
28	Baby Elephant Rattle Infant Soft Doll Toy Newborn Pram Bell Decor Christmas Gift	<p>Toy arrived in clear plastic bag with CE mark. No other labelling, No address</p> <p>Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1</p>	<p>BV Test Report: (5421)042-0029A 15/2/21 EN71-1: FAIL 5.1 General requirements - small parts generated 6. Packaging flexible plastics EN71-1: noted missing labelling UK address not present, CE mark less than 5mm, UKCA mark not present, washing/ cleaning instructions</p>		Unsafe





No	Toy Title as seen on eBay	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on eBay	Classification
29	Sky Adorable Roly-Poly Tumbler Doll Baby Toys For 6-12 Months Best XMAS Gifts UK	toy packaging in Chinese No address No CE mark No small parts within toy Missing Conformity Markings	BV Test Report: (5421)046-0010A 17/2/21 EN71-1: PASS EN71-1: noted missing labelling UK address not present, UKCA mark not present		Illegal
30	Baby Toys Music Cartoon Phone Educational Developmental Kids Toy Gift Telephone	toy packaging in Chinese No address No CE mark on pkg (CE mark stamped on toy) battery compartment screw hole has no screw Likely to fail EN62115 labelling requirements Missing Conformity Markings Warnings - Inaccurate 3+ and small parts plus missing EN62115 warnings Failed test report EN71-1	BV Test Report: (5421)042-0025A 16/2/21 EN71-1: FAIL 5. General requirements - small parts generated 5.4 cords on toys EN71-1: noted missing labelling UK address not present, CE mark not visible from outside pkg, UKCA not present		Unsafe
31	Baby Kids Teether Cloth Book Intelligence Development Educational Toys Z	No address CE mark too small Missing Conformity Markings	Not tested		Illegal
32	63pcs Magnetic Building Blocks Magnet Construction Kit Kids Puzzle Toy NEW	Silver magnets come in box with barcode. No labelling Small parts within the toy but no hazards / warnings labelling in place. Strong magnets Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test Report: (5421)042-0032A 16/2/21 EN71-1: FAIL 4. General requirements - small parts 4.22 small balls 4.23.2 magnets (149.8 kG2mm2) EN71-1: noted labelling missing UK address not present, CE/UKCA symbol, warning and choking hazards labelling 7.2 small balls labeling		Unsafe
33	Toddler Kids Water Flutes Musical Bath time Toys Fun Bath Tub Tunes Song Toy UK	No address baby photo advertised and 6months on webpage. Toy markings are for 3+ Missing Conformity Markings	Not tested		Illegal


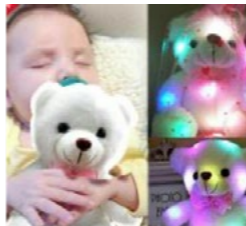


No	Toy Title as seen on eBay	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on eBay	Classification
34	Kids Pistol Bullet Dart Gun Outdoor Classic Soft M1911 Guns Toy Colt	No address 0-6 sign instead of 0-3 sign seemingly identical to recalled item in April 2020 Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test Report: (5421)042-0027A 16/2/21 EN71-1: FAIL 4. General requirements 4.17.3 projectiles with tip 6. Packaging flexible plastics EN71-1: noted missing labelling EU/UK address not present, UKCA mark not present		Unsafe Seemingly identical product Recalled on EU Safety Gate April 2020 A12/00613/20
35	2020 Baby Toys Music Cartoon Bus Phone Educational Developmental Kids Toy Gift	No address Baby advertised but labelled with 0-3 sign battery compartment hole came without screw Missing Conformity Markings	Not tested		Illegal
36	Magnetic Educational Toys Building Cars Airplane Boat Truck Play For Kids Gifts	No EU address Missing Conformity Markings Failed test report EN71-1	BV Test Report: (5421)042-0034A 16/2/21 EN71-1: FAIL 6. Packaging flexible plastics EN71-1: noted labelling to be modified No UK address		Unsafe
37	New baby toys 0-6 months Black & White Sensory Ribbon Wooden ring Girl & Boy	CE mark too small There is a warning to ensure adult supervision. Address is in place Inaccurate Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test Report: (5421)042-0026A 16/2/21 EN71-1: FAIL 4.11 mouth actuated toys 5.1 General requirements - small parts generated 5.4 free length of cords and chains EN71-1: noted labelling to be modified - CE mark is less than 5mm. UKCA mark not present		Unsafe
38	Kids Children Tablet IPAD Educational Learning Toys Gift For Girls Boys Baby Toy	No address Missing Conformity Markings	Not tested		Illegal




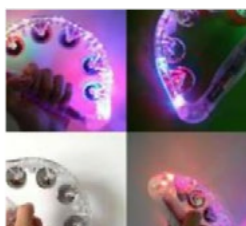
No	Toy Title as seen on eBay	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on eBay	Classification
39	Kids Baby Gym Floor Play Mat Musical Activity Center Kick Piano Keyboard Toys	No address Toy is for 0months + but packaging still shows 0-3 sign and choking parts warning Missing Conformity Markings Warnings - missing washing instructions Failed test report EN71-1	BV Test Report: (5421)046-0027A 18/2/21 EN71-1: FAIL 4.2 assembly instructions to be modified 5.1 general requirements - small parts generated 5.2 soft filled toys and soft filled parts of a toy 5.8 shape and size of certain toys 5.10 small balls 6 packaging flexible plastics EN71-1: noted missing labelling UK address, UKCA mark, washing instructions for mat, assembly instructions		Unsafe
40	Kids Baby Toy Stacking Ring Tower Educational Toys Rainbow Stack Up Gift Xmas UK	No labelling No address / No CE mark Missing Conformity Markings	BV Test Report: (5421)046-0007A 18/2/21 Phthalates: PASS		Illegal
41	Baby Montessori Basic Skills Activity Busy Board Educational Learning Aids Toys	Toy arrived in clear pocket with net backing with barcode label. No other information No address, No 0-3 but could be aimed at young children. Long strap and laces. The laboratory tested the toy for children over 36 months. However we consider the toy to be suitable for under 3 years and likely to fail EN71-1 if tested to this. Missing Conformity Markings Warnings - Inaccurate 3+ and small parts and missing long cords	BV Test Report: (5421)062-0010A 8/3/21 EN71-1: PASS EN71-1: noted missing labelling UK address, UKCA/CE mark, specific warnings and hazards missing for age restriction, small parts and long cords		Illegal

No	Toy Title as seen on eBay	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on eBay	Classification
42	50/100PCS Magnetic Building Blocks Construction Educational Boys Kids Magic Toys	Toy arrived in clear plastic bag. Toy instructions inside showing 3+. No other labelling strong magnets Missing Conformity Markings Warnings - specific warnings missing Failed test report EN71-1	BV Test Report: (5421)057-0032A 8/3/21 EN71-1: FAIL 4.23 magnets small parts generated (139 kG2mm2) EN71-1: noted missing labelling UK address, UKCA mark, specific warnings and hazards		Unsafe
43	Children Kids Puzzle Peg Board With 296 Pegs Educational Toys Creative Gifts NEW	No address Missing Conformity Markings	Not tested		Illegal
44	8-9 Piece Childrens Wooden Food Kitchen Pretend Clay Fruit & Veg Bread Set Toys	UK Address on label but no other markings. No age or warnings - could be for birth+ as no small parts. Sharpish edge on knife. No CE mark Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test Report: (5421)042-0030A 16/2/21 EN71-1: FAIL 5. General requirements - small parts generated 5.10 small balls EN71-1: noted missing labelling UKCA mark not present		Unsafe
45	Rainbow Fluffy Bead Kids Anti stress Clay Crunchy Foam Slime Toy Relax Funny New	Toy arrived in clear plastic bag. Barcode label on bubblewrap. No information Small parts within the toy but no hazards / warnings labelling in place Missing Conformity Markings Warnings - Inaccurate 3+ and small parts	BV Test Report: (5421)057-0016A 3/3/21 EN71-1: PASS EN71-1: noted missing labelling UK address, UKCA/CE mark, Specific warnings and hazards		Illegal
46	CARTOON CUTE MAGNETIC STUD EARRINGS FASHION JEWELLERY FOR KIDS TEEN GIRLS WOMENS	Toy arrived in clear plastic bag. EU German address on outer packaging but not sure if postal company or importer address. Missing Conformity Markings Warnings - specific warnings missing Failed test report EN71-1	BV Test Report: (5421)062-0024A 16/3/21 EN71-1: FAIL 4.23 Small parts, Magnetic flux (149.30 kG2mm2) EN71-1: noted missing labelling address, CE/UKCA mark, specific warnings and hazards BV Test Report: (5421)062-0024B 16/3/21 Nickel: PASS		Unsafe


No	Toy Title as seen on eBay	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on eBay	Classification
47	5 SET MAGNETIC Clip on Earrings Stud Kids GIRLS clipon Cute Colourful Fish Studs	Earrings arrived loose in envelope. No information Missing Conformity Markings Warnings - Specific warnings missing Failed test report EN71-1	BV Test Report: (5421)062-0022A 12/3/21 EN71-1: FAIL 4.23 Small parts, Magnetic flux (111.26 kG2mm2) EN71-1: noted missing labelling address, CE/UKCA mark, specific warnings and hazards BV Test Report: (5421)062-0022B 12/3/21 Nickel: PASS		Unsafe
48	Musical Mobile Phone TV Remote Control Kids Baby Early Electric Educational Toy	No address Toy is labelled for 6 months + but there is a 0-3 sign and warning hazard label. No battery information except for WEEE sign. 0-3 sign is too small. CE mark in place Missing Conformity Markings Warnings - missing EN62115 warnings	BV Test Report: (5421)062-0025A 10/3/21 EN62115: PASS EN62115: missing labelling some labelling missing		Illegal
49	Car Key Toy Remote Control Educational Toy Key for Kids Baby Toddler Toys	Toy arrived in clear plastic bag with barcode label. No information. No battery information except for WEEE symbol stamped on back of battery compartment Missing Conformity Markings Warnings - missing EN62115 warnings	BV Test Report: (5421)062-0021A 9/3/21 EN62115: PASS EN62115: missing labelling all labelling missing		Illegal
50	Sprinkler Ball Toy Bath Toys Water Spray Toy with LED Light and Music Kids Gift	No address Other information and battery information in place Ebay recalled a similar toy on 5/1/21 (it had failed EN62115) Missing Conformity Markings Warnings - missing EN62115 warnings Failed test report EN62115	BV Test report: (5421)077-0039A 31/3/21 EN62115: FAIL 5.15 Tension test - batteries box detached 9.4 short circuit 9.6 & 9.9 temperature rises 13 mechanical strength of enclosures 14.7 accessibility of batteries to <3yrs 14.11 non-detachable parts intended for protection EN62115: some missing labelling		Unsafe






No	Toy Title as seen on eBay	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on eBay	Classification
51	Baby toys music cartoon phone educational developmental kids toy Christmas Gift	No address Advertised with baby and 0-6 months. No age specified on toy. 0-3 sign visible CE mark and Warning signs. wheel has come off generating a small part Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test Report: (5421)077-0023A 25/3/21 EN71-1: FAIL 4.8 points & wires - sharp point 5.1 general requirements - small parts generated 5.4 cords, cables 6 packaging flexible plastics EN71-1: noted missing labelling address		Unsafe
52	Kids Colorful Wind-up Toys Baby Developmental Educational Toy	toy arrived in plastic bag with Chinese writing and barcode label. No information No small parts/long wind up mechanism Missing Conformity Markings Failed test report EN71-1	BV Test Report: (5421)077-0016A 25/3/21 EN71-1: FAIL 5.1 general requirements - small parts generated 5.10 small balls 6 packaging flexible plastics EN71-1: noted missing labelling Address, CE/UKCA mark		Unsafe
53	Baby Toddlers Toys Knock Music Board Hit Hamster Game Educational Kids Toy Gift	No address No CE Mark Packaging in Chinese 7months + No screw in the battery screw hole (AAA batteries) Some battery information Long cord without break Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test Report: (5421)077-0021A 25/3/21 EN71-1: FAIL 5.1 general requirements - small parts generated 5.14 straps around the neck - no breakaway EN71-1: noted missing labelling Address, CE/UKCA mark		Unsafe
54	UK Baby Music Mobile Phone TV Remote Control Early Electric Number Learning Toys	No address Minimal battery information Likely to fail EN62115 labelling requirements Missing Conformity Markings Warnings - Inaccurate 3+ and small parts and missing EN62115 warnings Failed test report EN71-1	BV Test Report: (5421)077-0034A 25/3/21 EN71-1: FAIL 5.1 general requirements - small parts generated EN71-1: noted missing labelling: address		Unsafe





No	Toy Title as seen on eBay	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on eBay	Classification
55	Baby Teething Cotton Sunflower Beech Starfish Pendant Wooden Beads Play Gym Toys	Toy arrived in plastic bag. No labelling Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test report: (5421)088-0035A 7/4/21 EN71-1: FAIL 4 general requirements - generated small parts (glue elements detached) 4.11 mouth-actuated toys 5.4 cords 5.8 shape and size of certain toys EN71-1: noted missing labelling address, UK/CE mark, washing/cleaning instructions		Unsafe
56	Toys For Girls LED light Stuffed Bear 1 2 3 4 5 6 7 8 9 Year Age Old Kids Gifts	Toy arrived in plastic bag with barcode label. No information Accessible battery compartment (AA batteries) Accessible stuffing Similar bear recalled by Ebay on 5/1/21 (failed EN71-1) Missing Conformity Markings Warnings - Inaccurate small parts Failed test report EN71-1	BV Test Report: (5421)077-0051A 25/3/21 EN71-1: FAIL 5.1 general requirements - small parts generated 5.2 soft filled toys - accessible stuffing 5.4 cords, chains - lighting ribbon 6 packaging - flexible plastics EN71-1: noted missing labelling address, CE/UKCE mark, cleaning instructions		Unsafe
57	Toy Disk Hover Cool Boys Ball LED Indoor Football for 3 4 5 6 7 8 9 Year Old Age	No address Minimal battery information No instructions Missing Conformity Markings Warnings - missing EN62115 warnings Failed test report EN62115	BV test report: (5421)077-0036A 30/3/21 EN62115: FAIL 15.1 absence of contact with moving parts (electric wires are in contact with rotating part) EN62115: some missing labelling		Unsafe
58	9Pcs/Set Doctor Role Play Dentist Puzzle Toys Children Kids Educational Toy Gift	Toy arrived in clear box / clear bag with bag warnings and barcode label. No other information. Small parts within the toy (the teeth) Small parts within the toy but no hazards / warnings labelling in place Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test Report: (5421)077-0010A 25/3/21 EN71-1: FAIL 5.1 general requirements - small parts within toy and generated small parts EN71-1: noted missing labelling address, CE/UKCA mark		Unsafe

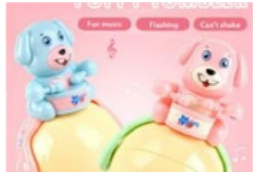




No	Toy Title as seen on eBay	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on eBay	Classification
59	10pcs/lot Kids Toys Soft Interactive Baby Dolls Toy Mini Doll Gift For Girls UK	Dolls arrived without packaging/labelling. Soft plastic heads/no small parts but potential to break Missing Conformity Markings Warnings - specific warnings missing Failed test report EN71-1 & Phthalates	BV Test Report: (5421)077-0014A 29/3/21 EN71-1: PASS EN71-1: noted missing labelling address, CE/UK mark, specific warnings and hazards BV Test Report: (5421)077-0014B 39/3/21 Phthalates: FAIL		Unsafe
60	Baby Plush Shark Teddy Stuffed Toys Soft Singing Dolls Xmas Gift Kids Boys Girls	No labelling battery case is accessible and without a screw in the battery case. Button cell batteries. Missing Conformity Markings Warnings - missing EN62115 warnings Failed test report EN62115	BV Test report: (5421)088-0058A 7/4/21 EN62115: FAIL 9.4 short circuit 9.9 temperature rises 14.6 & 14.7 Accessibility of button cell batteries to < 3yrs EN62115: missing labelling		Unsafe
61	Xylophone Baby Musical Instruments Toddler Educational Toys Kids Birthday Gift/	No address 3+ but advertised with baby No small parts/choking warning Insufficient battery information No small parts within toy. Button cell batteries but secure Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test Report: (5421)077-0048A 26/3/21 EN71-1: FAIL 5.1 general requirements - small parts generated EN71-1: noted missing labelling address, acoustics, assembly instructions		Unsafe
62	Sensory Led Light Up Flashing Tambourine Shaking Sensory Toy UK	No address No battery information on packaging or toy Missing Conformity Markings Warnings - missing EN62115 warnings Failed test report EN62115	BV Test Report: (5421)088-0034A 2/4/21 EN62115: FAIL 9.4 short circuit after drop test creating smoke release temperature increase 9.9 temperature rises EN62115: missing labelling		Unsafe

ALIEXPRESS RESULTS





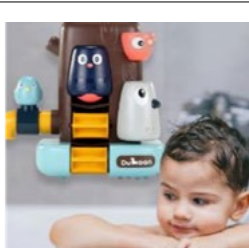
No	Toy Title as seen on AliExpress	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on AliExpress	Classification
1	Children Pretend Play Kid Make Up Toys Set Hairdressing Simulation Cosmetic Girls Dressing Travel Kit L9CD	No address Missing Conformity Markings	Not tested		Illegal
2	Wooden Train Track Series Kids Early Educational Learning Railway Toys Set Gift For Boy Girl Building Blocks	No address Missing Conformity Markings Warnings - Inaccurate 3+ and small parts Failed test report EN71-1	BV Test Report: (25421)040-479643 9/2/21 EN71-1: FAIL 4.23 Magnetic flux (146,18 kG2mm2) magnets became accessible after tension test - small parts generated 7.2 age warning symbol does not comply with the standard; BV classifies toy for children under 36months.		Unsafe
3	White Remote Control Electric Train Toy Magnetic Slot Compatible with Brio Wooden Track Car Toy Kids Gift	No address (email only) no small parts within the toy Missing Conformity Markings Warnings - missing EN62115 warnings Failed test report EN62115	BV Test Report: (5421)032-0010A 16/2/21 EN62115: FAIL Drop test 9.4 presence of a short circuit 9.6 accessible moving part locked 9.9 temperature rises Missing labelling		Unsafe
4	Kids Magnetic Puzzles Crazy Face Creative Puzzle Christmas Gift Educational Toys for Children Montessori Puzzles Toy W Iron Box	No address no small parts within the toy Missing Conformity Markings	BV Test report: (25421)040-479640 23/4/21 EN71-1: PASS		Illegal
5	New Children Wooden Blocks Colorful Assembling Three Small Train Building Wood Toy Baby Early Educational Learning Toys for Kids	No address Missing Conformity Markings	Not tested		Illegal

No	Toy Title as seen on AliExpress	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on AliExpress	Classification
6	Original Rowlet Plush Doll Stuffed Animal Toy Sun Moon 16cm Kid Gift	No address No CE Mark Missing Conformity Markings	Not tested		Illegal
7	Cute Three Little Piggies Hide Seek Puzzle Game Toy for Children Brain Teaser Toy 3 orders	No address. (There is a scan code but address is invalid when it's scanned.) No CE mark 0-3 symbol in place Missing Conformity Markings Warnings - in Chinese only	BV Test Report: (25421)035-479644 4/2/21 EN71-1: PASS EN71-1: noted - labelling not assessed as only available in chinese; product & safety labelling must be in the national language of the country of sale.		Illegal
8	A bag of puff snacks pillow peluche plush toy soft stuffed puff juguetes soothing toy children sleep snack baby home decorations	No labelling. Plush toy with zip Missing Conformity Markings Warnings - missing Failed test report Phthalates	BV Test Report: (25421)040-479625 9/2/21 Phthalates: FAIL		Unsafe
9	WW2 Weapon Pistol Gun Model Building Blocks Military Technic Gun Bullet City Police Figures Bricks Educational Toys for Children	Toy arrived in bubblewrap with instruction leaflet. No labelling except for 6+ on the instruction book. Small parts within the toy but no hazards / warnings labelling in place. Missing Conformity Markings Warnings - No 3+ and small parts	BV test report: (25421)036 479645 5/2/21 EN71-1: PASS Remark noted - No packaging for testing the labelling have been available		Illegal
10	Cute Shape LED Light Projection Appease Baby Music Toy Accompany Children Stuffed Animals Cartoon Kids Toys The Best Gift	No labelling CE mark on battery compartment. Missing Conformity Markings Failed test report EN62115	BV Test Report: (5421)057-0021A 5/3/21 EN62115: FAIL 9.4 presence of a short circuit 9.9 temperature rise 9.9 working requirements EN62115: missing labelling - battery information		Unsafe






No	Toy Title as seen on AliExpress	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on AliExpress	Classification
11	Let's Make Baby Toys 13 24 Months 1set Mobile On The Bed Rattles For Kids Mobile For Crib For Infants Musical Bed Bell Rotating	Toy arrived in bubblewrap with no labelling. Missing Conformity Markings Warnings - missing cot warning Failed test report EN71-1	BV Test Report: (5421)035-0014A 9/2/21 EN71-1: FAIL 5 Toys intended for children under 36months 5.1 General requirements - small parts 5.10 Small balls EN71-1: noted missing labelling address, CE/UKCA mark 7.23 toys intended to be attached to a cradle, cot or pram		Unsafe
12	Baby Sucker Toy Musical Rotating Ferris Wheel Rattle Infant Electric Flash Hand Bell Windmill Chair Stroller Toy For Baby 0 12 M	No address Quite loud battery operated Missing Conformity Markings	BV Test Report: (5421)035-0012A 9/2/21 EN71-1: PASS EN71-1: noted missing labelling 7. UKCA mark		Illegal
13	Owl Tumbler Toy Baby Music Large Early Education 0-3 Year Old Baby Comfort Toy Boy Girl	Toy arrived in bubblewrap with no labelling baby toy - no small parts within the toy Missing Conformity Markings	Not tested		Illegal
14	Let's Make Safe Wooden Toys Baby Montessori Toddler Toy Grip DIY Crochet Rattle Soother Bracelet Teether Toy Set Baby Product	Toy arrived in box with only a barcode displayed. No other labelling. No address No CE mark Missing Conformity Markings Warnings -missing 3+ and small parts Failed test report EN71-1	BV Test report: (5421)035-0016A 9/2/21 EN71-1: FAIL 5. toys intended for children under 36 months 5.1 General requirements (small parts generated) 5.8 shape and size of certain toys 5.10 small balls EN71-1: noted missing labelling address, CE/UKCA mark		Unsafe

No	Toy Title as seen on AliExpress	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on AliExpress	Classification
15	Baby Music Luminous Puppy Tumbler Educational Toy Tumbler Baby Toy Color Random Dog Tumbler	No address No CE mark battery operated Missing Conformity Markings			Illegal
16	Montessori Power Balloon Launch Tower Toy Diecasts Toy Vehicles Power Balloon Car Science Educational Toys for Boy Children Gift	No information in English seen on box. No small parts. Small balloons Missing Conformity Markings Warnings - missing balloon warnings	BV Test report: (5421)035-0015A 9/2/21 EN71-1: PASS 4.12 balloon material labelling to be modified EN71-1: noted missing labelling address, CE/UKCA mark, specific warnings and hazards inc. 7.3 balloon warning		Illegal
17	MSC Voice Control Mini Model Police Cute Car Dump Truck Ambulance Cement Mixer Excavator Fire Engine Baby Toys for Boys Girls	No information in English seen on box. No CE mark No 0-3 sign looks to be a warning but in Chinese no small parts within the toy Missing Conformity Markings	Not tested		Illegal
18	Kids Toys Simulation Track Inertia Airplane Music Stroy Light Plane Diecasts & Toy Vehicles Passenger Plane Toy Car Boys Toys	Labelling info in Chinese. Looks to be a warning. 0-3 sign No CE mark No address small screwdriver and spare battery compartment screws supplied with toy Small parts within the toy but no hazards / warnings labelling in place. Missing Conformity Markings Warnings - Missing 3+ and small parts	BV Test Report: (5421)040-0024A 11/2/21 EN71-1: PASS 4.2 instructions to be modified to include adult assembly EN71-1: noted missing labelling address, UKCA mark (CE mark not visible from outside pkg.) specific warnings and hazards		Illegal
19	New Children's Excavator Toys Electric Music Lighting Wand Wheel Engineering Car Foreign Trade Boys and Girls Toy Car	No address No CE mark All info in Chinese so warning could be in place. No 0-3 sign No screw provided for the screw hole on the battery compartment. No battery information Missing Conformity Markings Warnings -missing EN62115 labelling Failed test report EN62115	BV Test Report: (5421)035-0010A 9/2/21 EN62115: FAIL 5.15 Drop test 5.13 Test with polarity reversed (current value 62mA) 9.4 heating/bridged insulation (of 100.3C) 9.9 Measurement of temp rises Missing Labelling (battery info missing)		Unsafe

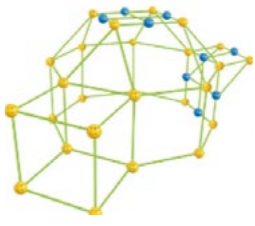




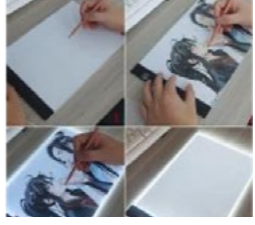
No	Toy Title as seen on AliExpress	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on AliExpress	Classification
20	35cm New Princess Mermaid model figure doll with wings beautiful Fairy dolls action toys girl's toy gifts	No labelling. Toy arrived in clear plastic bag no small parts within the toy Missing Conformity Markings Warnings -missing Failed test report Phthalates	BV Test Report: (25421)040-479626 9/2/21 Phthalates: FAIL		Unsafe
21	Simulated Supermarket Cash Register Toy DIY Interactive Lamp Sound Role Play Shopping Game Kid Gift Boy Girls Pretend Play Toys	No address No CE mark all info in Chinese small parts within the toy Small parts within the toy but no hazards / warnings labelling in place. Missing Conformity Markings Warnings -missing Failed test report EN71-1	BV Test report: (5421)035-0013A 8/2/21 EN71-1: FAIL 6. Packaging flexible plastics EN71-1: noted missing labelling address, CE/UKCA mark, specific warnings and hazards		Unsafe
22	Disney Princess Play House Toy Girl Cosmetic Set Simulation Kitchen Kitchenware Doctor Toolbox Backpack Mickey Minnie Kids Toy	Information on packaging in Chinese. No CE mark No 0-3 sign carry case with strap Laboratory defined toy as for 24months + Missing Conformity Markings Warnings -missing 3+ and small parts Failed test report EN71-1	BV Test report: (5421)035-0011A 8/2/21 EN71-1: FAIL 5.1 generated small parts 5.12 Hemispheric-shaped toys EN71-1: noted missing labelling address, CE/UKCA mark		Unsafe
23	Electric Music Night Light Cute Cartoon Plush Doll Stuffed Animal Cuddly Toy 23GD	No address Battery information in place 18months + Missing Conformity Markings	Not tested		Illegal
24	Baby Montessori Toys One Year Old Cartoon Pull Back Car Juguetes Carro Animal Vehicle Education Soft Toys for Baby Boy Xmas Gift	Toy box in Chinese. No address No CE mark No age range No warnings No small parts. Pull back vehicles Missing Conformity Markings	BV Test Report: (5421)046-0003A 18/2/21 EN71-1: PASS EN71-1: noted missing labelling address, CE/UKCA mark BV Test Report: (5421)046-0003B 18/2/21 Phthalates: PASS	Eco-friendly Material 	Illegal

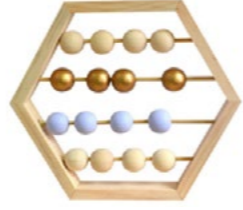




No	Toy Title as seen on AliExpress	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on AliExpress	Classification
25	6PCS Wooden Eggs Yolk Pretend Play Kitchen Food Cooking Kids Children Baby Toy	Toy box in Chinese except for choking hazard warning. No 0-3 symbol No CE mark No address small parts within the toy The laboratory tested the toy for children over 36 months. However we consider the toy to be suitable for under 3 years and likely to fail EN71-1 if tested to this. Missing Conformity Markings Warnings -missing 3+ and small parts	BV Test Report: (5421)062-0019A 8/3/21 EN71-1: PASS EN71-1: noted missing labelling address, CE/UKCA mark		Illegal
26	iPlay, iLearn Baby Rattles Set, Infant High Chair Toys W/ Suction Cup, Grab N Spin Gifts for 6, 9, 12, 18, 24 Months, 1 2 Year	No EU address All hard plastic Missing Conformity Markings	Not tested		Illegal
27	Paw patrol Toy Digital Watch Projection 24 Style Cartoon patterns Time Clock Action patrulla Canina Toy Children Birthday Gift	Toy arrived in clear plastic bag. No labelling. Very strong light/projector Likely to fail EN62115 labelling requirements Missing Conformity Markings Warnings -missing EN62115 warnings	BV Test Report: (5421)067-0455 23/3/21 EN 60825-1: PASS		Illegal
28	City Creator Mini Bricks Hamburg Ice Cream Dessert Car Figurine Model Vehicle Education Building Blocks Toys For Children Gifts	No address Markings on the building blocks bags No external toy packaging Missing Conformity Markings Failed test report EN71-1	BV Test Report: (5421)057-0018A 4/3/21 EN71-1: FAIL 4.8 points and wires - yellow stars present sharp points 6 packaging flexible plastics EN71-1: noted missing labelling address, UKCA mark		Unsafe
29	2020 Bathroom Toys Pipeline Water Spray Shower Game Bird Mushroom Toy for Children Swimming Bathroom Bathing Kids Toy gift	Toy box in Chinese No CE mark 6months + so no warnings Missing Conformity Markings Failed test report EN71-1	BV Test Report: (5421)046-0011A 18/2/21 EN71-1: FAIL 5.8 Shape and size of certain toys 5.12 hemispheric shaped toys 5.13 suction cups 4.2 assembly instructions missing EN71-1: noted missing labelling address, CE/UKCA mark		Unsafe





No	Toy Title as seen on AliExpress	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on AliExpress	Classification
30	Baby Car Track Adventure Game Manual Rail Train Toys for Children Education Toy Macaron Color Table Game Puzzles Birthday Gifts	Small parts within the toy Box states 3+, webpage states 2-4. All marking in Chinese. No CE mark No 0-3 sign Small parts within the toy but no hazards / warnings labelling in place Missing Conformity Markings Warnings -missing 3+ and small parts	BV test report: (5421)057-0036A 4/3/21 EN71-1: PASS EN71-1: noted missing labelling address, CE/UKCA mark, specific warnings and hazards		Illegal
31	Kids Animal 3D Wooden Puzzle Montessori Toy Double-sided Strip Puzzle Telling Story Stacking Jigsaw Educational Toy For Children	Toy in clear plastic wrapping. No labelling. No small parts within toy. Missing Conformity Markings	Not tested		Illegal
32	Creative Magnetic Building Blocks Toys Magnet Maze Ball Track Blocks Magnetic Funnel Slide Blocks Educational Toys For Children	All information in Chinese. No address No CE mark No 0-3 sign or warning Small parts within the toy but no hazards / warnings labelling in place. Missing Conformity Markings Warnings -missing 3+ and small parts Failed test report EN71-1	BV Test Report: (5421)057-0035A 4/3/21 EN71-1: FAIL 4 General requirements 4.22 small balls warning to be modified 4.23 magnets (113.33 kG2mm2) EN71-1: noted missing labelling address, CE/UKCA mark, specific warnings and hazards		Unsafe
33	Baby Toys 13 -24 Months Matching Sorter toy Hedgehog Sorter Toy Kids Stacking Toys Toddler Montessori Toy Interactive Game Gift	No address Toy is for 18months + but also has 0-3 sign and choking warning. No small parts within the toy Missing Conformity Markings	Not tested		Illegal
34	7PC Children Pretend Play Kitchen Toy Set Miniature Kitchen Simulation Food Cookware Pot Pan Cooking Play House Toy For Girl Kid	No address Missing Conformity Markings	Not tested		Illegal





No	Toy Title as seen on AliExpress	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on AliExpress	Classification
35	2020 Children'S Education Wooden Gear Assembly Caterpillar Toys Assembling Blocks Colorful Sorting Color Cognitive Board Toy	Toy arrived in plastic packaging. No information. No small parts within the toy Missing Conformity Markings	Not tested		Illegal
36	Saizhi DIY Electric Walking Robot Model Kits Kids Teaching Students Children STEAM Scientific Experiment Toys Educational Toy	No EU address Instruction leaflet only in Chinese. No CE mark No 0-3 sign Small parts within the toy but no hazards / warnings labelling in place. Laboratory noted toy clearly unsuitable for children under 36months - marking not applicable. Likely to fail EN62115 labelling requirements Missing Conformity Markings Warnings -missing EN62115 warnings	BV Test Report: (5421)057-0033A 10/3/21 EN71-1: PASS EN71-1: noted missing labelling EU/UK address, CE/UKCA mark		Illegal
37	Mini Simulation Pretend Play Vacuum Cleaner Toys Kids Cleaning Furniture Tools Electric Light Music Sweeping Robot	Toy box in Chinese No address No CE mark There looks to be battery info & choking warnings but in Chinese Likely to fail EN62115 labelling requirements Missing Conformity Markings Warnings -missing EN62115 warnings	Not tested		Illegal
38	Portable Handheld 1 Pair Kids Walkie Talkies Kids Toy Cute Rabbit Walkie Handheld Talk Parent-Child Educational Interactive Toys	All information in Chinese. No address No CE mark No 0-3 sign or warning Battery compartment is not locked by any mechanism - it slides open. Missing Conformity Markings Warnings -missing EN62115 warnings	BV Test Report: (5421)046-0012A 24/2/21 EN62115: PASS EN62115: some missing battery labelling		Illegal
40	Kids Baby Goal Toy Air Hover Soccer Ball Educational Toys For Home Indoor Outdoor Child Promotion Led Flash Light Rechargeable	No address All other labelling OK Battery information in place Missing Conformity Markings	BV Test Report: (5421)046-0018A 24/2/21 EN62115: PASS		Illegal





No	Toy Title as seen on AliExpress	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on AliExpress	Classification
40	Kids Baby Goal Toy Air Hover Soccer Ball Educational Toys For Home Indoor Outdoor Child Promotion Led Flash Light Rechargeable	No address All other labelling OK Battery information in place Missing Conformity Markings	BV Test Report: (5421)046-0018A 24/2/21 EN62115: PASS		Illegal
41	0-12 Months Newborn Baby Development Ball Safe Soft Teething Toys Plastic Hand Bell Early Educational Rattle Teether Baby Toys	Toy arrived in clear plastic bag. No markings. Missing Conformity Markings Failed test report EN71-1	BV Test Report: (5421)046-0026A 17/2/21 EN71-1: FAIL 6. Packaging flexible plastics EN71-1: noted missing labelling address, CE/UKCA mark, type/model number		Unsafe
42	Funny Toy Mouth Dentist Bite Mouth Finger Toy Large Crocodile Pulling Teeth Bar Games Toys Kids Funny Toy For Children Gift	Toy arrived in box with Chinese information only. No warnings/markings. No small parts although snapping mechanism. Missing Conformity Markings Warnings -missing warnings	BV Test Report: (5421)046-0029A 17/2/21 EN71-1: PASS EN71-1: noted missing labelling address, CE/UKCA mark, specific warnings and hazards		Illegal
43	DIY Metal Neodymium Magic Magnet Magnetic Balls Blocks Cube Construction Building Toys Colorfull Arts Crafts Toy	magnetic balls arrived in clear plastic bag. No labelling. Strong magnets Small parts within the toy but no hazards / warnings labelling in place Missing Conformity Markings Warnings -missing 3+ and small parts Failed test report EN71-1	BV Test Report: (5421)077-0017A 25/3/21 EN71-1: FAIL 4.22 small balls 4.23 magnetic flux (164.84 kG2mm2) EN71-1: noted missing labelling address, CE/UKCA mark, specific warnings and hazards		Unsafe
44	Magic Luminous Drawing Board Daw With Light-Fun Sketchpad Board Fluorescent Pen Russian English Light Up Play Toys For Kids	Toy arrived in clear plastic bag. No markings. Instructions do say 6+ due to small parts. Button cell batteries Missing Conformity Markings Warnings -missing EN62115 warnings Failed test report EN62115	BV Test Report: (5421)046-0017A 23/2/21 EN62115: FAIL 13 strength of enclosures 14.6 accessibility of button cells and type R1 batteries missing labelling		Unsafe





No	Toy Title as seen on AliExpress	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on AliExpress	Classification
45	Kids Construction Fort Building Castles Tunnels Tents Kit DIY 3D Play House Building Toys for Boys Girls Christmas Gift	No address Missing Conformity Markings	Not tested		Illegal
46	Children characters magnetic stickers career changing facial expressions jigsaw puzzle intelligence baby toys	No information on toy box except for warning on small parts. Missing Conformity Markings	BV Test Report: (5421)057-0017A 4/3/21 EN71-1: PASS EN71-1: noted missing labelling address, CE/UKCA mark		Illegal
47	Rolling Ball Pile Rattles Tower Puzzle Babys Toys Spin Track Montessori Educational Newborn Toys For Kids 1 & Hobbies	Toy arrived in protective plastic. No markings No small parts Missing Conformity Markings Warnings -missing 3+ and small parts Failed test report EN71-1	BV Test Report: (5421)046-0028A 18/2/21 EN71-1: FAIL 5.1 small parts generated 5.10 small balls EN71-1: noted missing labelling address, serial number, CE/UKCA mark		Unsafe
48	ZKZC Big Size Magnetic Designer Magnet Building Blocks 180pcs Construction Set Magnetic Bircks DIY Toys For Children Gifts	Magnetic shapes arrived in clear box. 0-3 sign too small CE mark on instructions inside box Baby on box Looks to be a warning but in Chinese No address (Netherlands address on outer packaging) Missing Conformity Markings Warnings -missing specific warnings Failed test report EN71-1	BV Test Report: (5421)077-0019A 25/3/21 EN71-1: FAIL 4.23 small parts/ magnets generated and magnetic flux (246 kG2mm2) EN71-1: noted missing labelling address, specific warnings (modified) and hazards		Unsafe
49	22pcs Spirograph Drawing Toy Set Interlocking Gears Wheels Painting Drawing Accessories Creative Educational Toy Spirographs GYH	No EU address toy includes pens with pen lids 0-3 too small Missing Conformity Markings	BV Test Report: (5421)049-0006A 25/2/21 BS7272-1: PASS BS7272-2: PASS		Illegal
50	A4 Level Dimmable Led Drawing Copy Pad Board Children's Toy Painting Educational Kids Grow Playmates Creative Gifts For Children	No packaging Some instructions on leaflet in English No markings Missing Conformity Markings Warnings -missing specific warnings	BV Test Report: (5421)062-0011A 8/3/21 EN71-1: PASS EN71-1: noted missing labelling address, CE/UKCA mark, specific warnings and hazards		Illegal

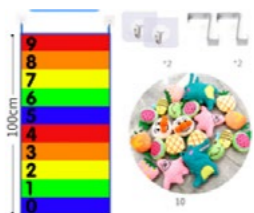





No	Toy Title as seen on AliExpress	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on AliExpress	Classification
51	Wooden Abacus Calculating Beads Craft Baby Children Kids Early Learning Educational Toys Nordic Style Natural Child Room Decor	Toy arrived in plain cardboard box. No labelling. Missing Conformity Markings Warnings -missing 3+ and small parts Failed test report EN71-1	BV Test Report: (5421)057-0039A 4/3/21 EN71-1: FAIL 5.1 General requirements - small parts generated including small balls 5.10 small balls EN71-1: noted missing labelling CE/UKCA mark, address, serial number		Unsafe
52	Hot Portable Steel Wool Pyrotechnic Kids Toys Party Flame Hand Swing Sparks Fairy Firework Stick Adult Children Game Outdoor Toy	Toy arrived in clear plastic bag. No markings. It's called a toy but it's a collection of parts. No instructions Missing Conformity Markings Warnings -missing cord warning Failed test report EN71-1	BV Test Report: (5421)046-0021A 17/2/21 EN71-1: FAIL 4.7 Edges 4.8 points & wires 6. Packaging flexible plastics EN71-1: noted missing labelling address, CE/UKCA mark, long cord strangulation hazard		Unsafe
53	Sushi Train Rotary Sushi Toy Track Train Electric Girls and Train Rotary Sushi Simula Revolving Car Ushi Children Electric Train	Toy box in Chinese. No address Battery operated Likely to fail EN62115 labelling requirements Missing Conformity Markings Warnings -missing EN62115 warnings	Not tested		Illegal
54	Baby Toys Wooden 3d Puzzle Tangram Shapes Learning Cartoon Animal Intelligence Jigsaw Puzzle Toys For Children Educational	Toy wrapped in clear plastic film. No labelling No small parts within the toy Missing Conformity Markings	Not tested		Illegal
55	Follow Any Drawn Line Magic Pen Toy Inductive Robot Model Children Kids Toy Gift Truck Black Track Map Selfie Run Electric Toy	No address All other labelling OK Battery information in place Missing Conformity Markings	BV Test Report: (5421)046-0014A 25/2/21 EN62115: PASS Battery labelling present and correct		Illegal



No	Toy Title as seen on AliExpress	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on AliExpress	Classification
56	Hanoi Tower Kids Educational Toys Wooden Puzzle Stacking Tower Early Learning Classic Mathematical Puzzle Children Baby Toys ZXH	No EU address 0-3 too small Missing Conformity Markings Warnings - incorrect warning hazard	BV Test Report: (5421)046-0013A 18/2/21 EN71-1: PASS EN71-1: noted missing labelling UK address not present, height of CE mark less than 5mm, UKCA mark not present, Chokong hazard instead of Choking hazard		Illegal
57	4pc/set Baby Wooden Pendant Play Gym Toys BPA Free Wooden Teether Rodent Animal Interactive Stroller Hanging Bed Bell Nurse Gift	Toy arrived in clear plastic bag. No labelling. Missing Conformity Markings Warnings -missing 3+ and small parts Failed test report EN71-1	BV Test Report: (5421)057-0038A 5/3/21 EN71-1: FAIL 4.11 mouth actuated toys - small parts generated 5.1 general requirements - small parts generated 5.8 shape and size EN71-1: noted missing labelling address, CE/UKCA mark, serial number		Unsafe
58	DIY Metal Neodymium Magic 5mm Magnet Magnetic Balls Blocks Cube Construction Building Toys Colorfull Arts Crafts Toy Over 14Y	Toy arrived in tin. No labelling Small magnetic balls. Strong magnets Small parts within the toy but no hazards / warnings labelling in place Missing Conformity Markings Warnings -missing 3+ and small parts Failed test report EN71-1	BV Test report: (5421)105-0022A 21/4/21 EN71-1: FAIL 4 general requirements 4.23 magnetic flux (222 kG2mm2) EN71-1: noted missing labelling address, CE/UKCA mark, specific warnings and hazards		Unsafe
59	Moyu Luban Magnetic Building blocks 3x3 Fun Assembled Building Blocks Cube Transparent Block Children's Educational Toys	Most of labelling on toy box in Chinese. CE mark 0-3 sign Looks to be a warning but in Chinese Instruction booklet has company name, email & tel number. Small parts within the toy but no hazards / warnings labelling in place Missing Conformity Markings Warnings -missing 3+ and small parts	BV Test Report: (5421)077-0022A 25/3/21 EN71-1: PASS EN71-1: noted missing labelling address, specific warnings (to be modified) and hazards		Illegal

No	Toy Title as seen on AliExpress	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on AliExpress	Classification
60	DIY Mini Size Magnetic Designer Construction Set Model Building Toy Magnets Magnetic Blocks Educational Toys For Children Gifts	shapes arrived in plain pink drawstring bag. Instruction leaflet inside had under 3 'choking hazard' warning. Missing Conformity Markings Warnings - not visible at point of sale Failed test report EN71-1	BV Test Report: (5421)062-0022A 9/3/21 EN71-1: FAIL 4 general requirements 4.23 magnets EN71-1: noted missing labelling address, CE/UKCA mark, specific warnings not visible from outside packaging		Unsafe
61	1pcs Mini Magnetic DIY Building Blocks Parts Construction Toys for Toddlers Designer Magnetic Toys Magnet Model Building Toys	A few plastic shapes arrived in clear plastic bag. No labelling. The toys were not magnetic or small parts. Missing Conformity Markings Warnings -missing	Not tested		Illegal
62	157pcs/SET Magnet Bars Metal Balls Design Blocks Mini Bead Stick Geometric Figure Construction Toys For Kid Intelligence Gifts	No EU Address strong magnets Missing Conformity Markings Failed test report EN71-1	BV Test Report: (5421)077-0050A 25/3/21 EN71-1: FAIL 4 general requirements - small parts 4.23 magnetic flux (86.48 kG2mm2) EN71-1: noted missing labelling UK/EU address		Unsafe
63	Wholesale 12 Pairs Lovely Fruits Earrings Watermelon Magnet Magnetic Earrings for baby girls Christmas Gift yE90-1	Magnetic earrings arrived in clear plastic bag. No labelling Small parts within the toy but no hazards / warnings labelling in place Missing Conformity Markings Warnings -missing 3+ and small parts Failed test report EN71-1	BV Test report: (5421)081-0040A 8/4/21 EN71-1: FAIL 4 general requirements - small parts 4.23 magnetic flux (85 kG2mm2) 6 packaging - flexible plastics EN71-1: noted missing labelling address, CE/UK mark, specific warnings and hazards BV Test report: (5421)081-0040B 8/4/21 Nickel: PASS		Unsafe



No	Toy Title as seen on AliExpress	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on AliExpress	Classification
64	15-68PCS Kids Magnetic Fishing Toy Set Baby Water Toys with Inflatable Pool Magnet Fishing Rod Classic Toys for Children Gifts	Toys arrived loose in box in clear plastic bags. No labelling. Small parts within the toy but no hazards / warnings labelling in place Missing Conformity Markings Warnings -missing 3+ and small parts Failed test report EN71-1	BV Test report: (5421)077-0053A 29/3/21 EN71-1: FAIL 4 general requirements - small parts 4.23 magnetic flux (82.41 kG2mm2) 6 packaging - flexible plastics EN71-1: noted missing labelling address, UK/CE mark, specific warnings and hazards BV Test report: (5421)077-0053B 29/3/21 Phthalates: PASS		Unsafe
65	Baby Toy 13 24 Months Kids Early Educational Toy Puzzle Toys for Baby Boys 1 Year Toddler Music Educational Game Toy Girls Gifts	Packaging details in chinese. 0+ months. Missing Conformity Markings	Not tested		Illegal
66	15Pcs Set Plastic Magnetic Fishing Toys Baby Bath Toy Fishing Game Kids 1 Poles 1 Nets 13 Magnet Fish Indoor Outdoor Fun Baby	Toy arrived in printed plastic bag with barcode. All information in Chinese No small parts Missing Conformity Markings Warnings -missing specific warnings Failed test report EN71-1	BV Test report: (5421)088-0051A 2/4/21 EN71-1: FAIL 4 general requirements - small parts generated 4.23 magnetic flux (76 kG2mm2) EN71-1: missing labelling address, UK/CE mark, specific warnings and hazards		Unsafe
67	New 2021 Funny Kids Toys Cute Cartoon Insects Suction Cup Spinner Toy Baby Rattle Toy Spin Top Bath Toys For Children	No address Missing Conformity Markings	Not tested		Illegal


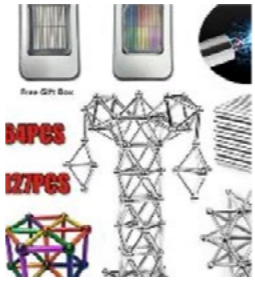
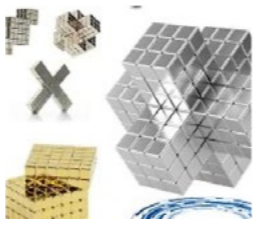

No	Toy Title as seen on AliExpress	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on AliExpress	Classification
68	3WBOX Tiger with Hammer Sound Light Electric Early Education Desktop Percussion Game Christmas New Year Gifts Toys Age Rang	Toys arrived in bubble wrap. Small balls CE mark and WEEE sign on battery compartment No other battery information. Likely to fail EN62115 labelling requirements Small parts within the toy but no hazards / warnings labelling in place Missing Conformity Markings Warnings -missing 3+ and small parts Failed test report EN71-1	BV Test report: (5421)105-0020A 22/4/21 EN71-1: FAIL 5.1 general requirements - small parts and generated small parts 5.4 cords 5.10 small balls EN71-1: noted missing labelling Address, batch/serial no.		Unsafe
69	45cm Kawaii Stuffed Plush Doll Kids Toys for Girls Children Lovely Baby Plush Doll Toys Princess Plush Toys Girls Birthday Gifts	Doll arrived in clear plastic bag. No labelling. No obvious small parts. Stringy wool hair Missing Conformity Markings Warnings -missing washing instructions Failed test report EN71-1	BV Test Report: (5421)077-0012A 25/3/21 EN71-1: FAIL 5 general requirements - small parts generated 5.2 soft filled toys - access to filling EN71-1: noted missing labelling address, CE/UKCA mark, washing instructions		Unsafe
70	Plush Backpack Kawaii Doll Soft Toy For Girl Baby Cute Cartoon Stuffed Animals For Kid Child School Shoulder Bag In Kindergarten	Backpack arrived in clear plastic bag with no labelling. Zip and straps Missing Conformity Markings	BV Test Report: (5421)077-0046A 25/3/21 EN71-1: PASS EN71-1: noted missing labelling address, CE/UKCA mark, cleaning instructions		Illegal
71	Pretend Play Set Plastic Food Toy DIY Cake Toy Cutting Fruit Vegetable Food Pretend Play Toys For Children Educational Gift GYH	Toy arrived in bubblewrap with label No EU address small parts within the toy 0-3 too small Missing Conformity Markings Warnings -missing specific warnings Failed test report EN71-1	BV test report: (5421)088-0048A 1/4/21 EN71-1: FAIL 4 general requirements 4.9 protruding parts - puncture hazard 6 packaging - flexible plastics EN71-1: noted missing labelling address, CE/UK mark, specific warnings and hazards		Unsafe
72	Kids Wooden Puzzles Toys Memory Match Stick Chess Game Fun Puzzle Board Game Educational Color Cognitive Geometric shape Toys	Toy arrived in plain cardboard box. No labelling No small parts Missing Conformity Markings	Not tested		Illegal





No	Toy Title as seen on AliExpress	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on AliExpress	Classification
73	Kids Touch High Carpet Games Bounce Trainer Promote Growth Fun Sports Toy Height Ruler Indoor Outdoor Toys for Children	Toy arrived with barcode label. No information. Missing Conformity Markings	Not tested		Illegal
74	Cartoon Animal Hand Puppets Plush Toy Lovely Kids Sleep Story Game Puppet Parent-Child Interaction Toy Puppet Dolls	No address CE mark too small Missing Conformity Markings	Not tested		Illegal
75	Racing Slide Track Car Baby Toys 0 36 Months 12 Months Toddlers Kids Juguetes Educational Gift	No address No CE Mark No warning (information in Chinese) 0-3 sign in place (baby in advertising) No small parts within toy Missing Conformity Markings	Not tested		Illegal
76	Remote Control Shark Toys Air Swimming Fish RC Animal Toy Infrared RC Fly Air Balloons Clown Fish Toy Gifts Party Decoration	No address Missing Conformity Markings Warnings -missing EN62115 warnings Failed test report EN62115	BV test report: (5421)088-0032A 8/4/21 EN62115: FAIL 5.15 tension test 9.4 bridged insulation - short circuit generating temperature rise 9.9 temperature rises EN62115: missing labelling		Unsafe
77	Creative Scientific experiment Toys Filler Balloon Racer DIY Balloon Car Children Educational Toys for Kids Boys	Toy arrived in clear plastic bag. No information. Instruction leaflet in chinese. No small parts. Small balloons Missing Conformity Markings Warnings -missing balloon warnings and age Failed test report EN71-1	BV Test report: (5421)088-0059A 7/4/21 EN71-1: FAIL 4.11 mouth actuated toys - small parts (foam parts of car) generated 4.12 balloon material labelling to be modified EN71-1: noted missing labelling address, CE/UKCA mark, specific warnings and hazards		Unsafe
78	Girls Makeup Set Princess Cosmetics Make Up Set For Kids Pretend Play Make Up Toys For Children Kids Princess Dress Up Princess	Toy arrived in bubblewrap and clear plastic bag. No information Small parts make up Missing Conformity Markings Warnings -missing specific warnings Failed test report EN71-1	BV Test report: (5421)088-0046A 1/4/21 EN71-1: FAIL 6 flexible plastics EN71-1: noted missing labelling address, CE/UKCA mark, specific warnings and hazards		Unsafe



No	Toy Title as seen on AliExpress	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on AliExpress	Classification
79	Luminous Projection Toys LED Night Light Magic Wand With Music Flash Shine Glow Stick Creative Toys Gifts For Children Kids Girl	Toy arrived in bubblewrap. No labelling. Button cell batteries but secure. Likely to fail EN62115 labelling requirements Missing Conformity Markings Warnings -missing EN62115 warnings	Not tested		Illegal
80	Bath Tub Fun Swimming Baby Bath Toy Mermaid Wind Up Floating Water Toy For Kids Kids Interactive Fun Water Toys Gift #30	Toy arrived in plastic bag with barcode. No information Missing Conformity Markings Failed test report EN71-1	BV Test report: (5421)088-0029A 1/4/21 EN71-1: FAIL 5.1 general requirements - small parts generated 5.4 cords - cross section EN71-1: noted missing labelling address, CE/UKCA mark		Unsafe




WISH RESULTS

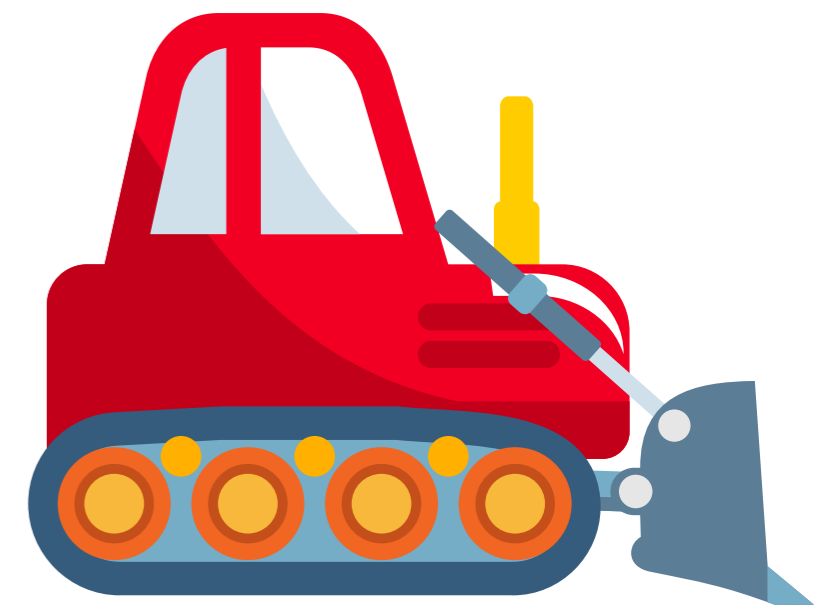
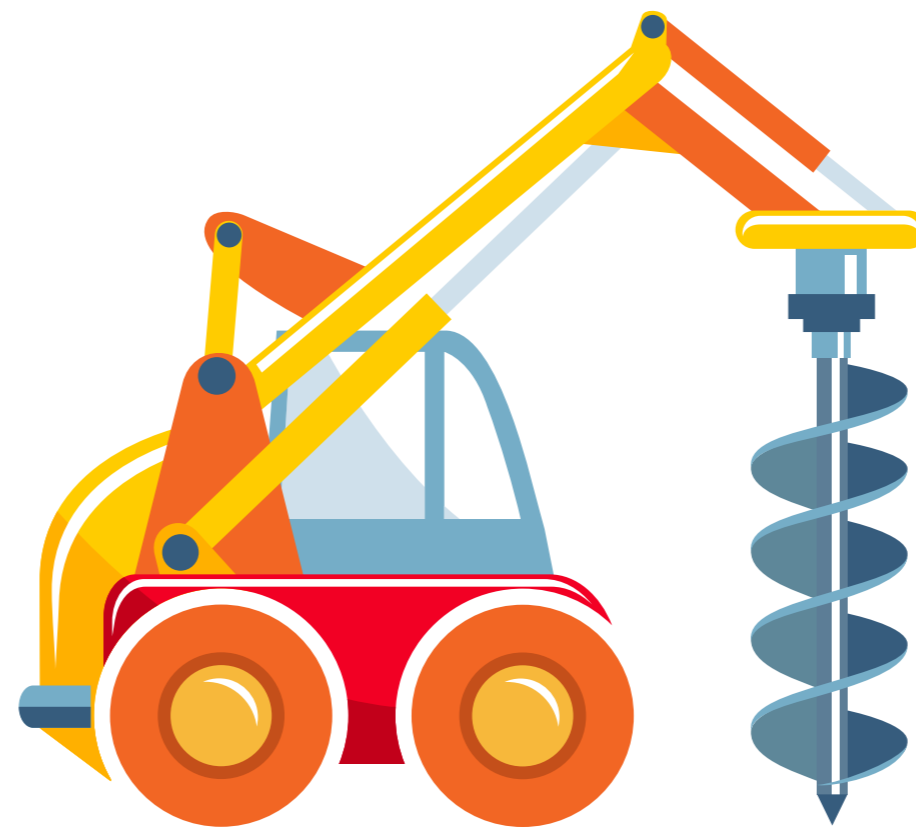
No	Toy Title as seen on WISH	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on WISH	Classification
1	Doctor's Toy Set Toys Kids Toy Det Educational Toys For Children Surgical toys	No address No small parts within the toy 3+ warnings present Missing Conformity Markings	Not tested		Illegal
2	50CM Creative toy Cute Inductive dog nightlight plush toy LED glow pillow soft light up stuff toy dog pet quality	Toy arrived in clear plastic bag. No labelling. Zip on dog. No screw on battery cover. Batteries accessible (AA batteries). No stuffing. No battery information. Likely to fail EN62115 labelling requirements. Missing Conformity Markings Warnings -missing EN62115 warnings & washing under EN71-1 Failed test report EN71-1	BV Test report: (5421)088-0019A 29/3/21 EN71-1: FAIL 5.1 general requirements - generated small parts 5.8 shape and size EN71-1: noted missing labelling address, CE/UKCA mark, washing/cleaning instructions		Unsafe
3	Birthday Cake Toy, Pretend Cake Play Set with Candles and Music, Donut Toys, Play Food for Princess Birthday Party, Gift for 3 4 5 6 7 Year Old Girls, Toddlers, Kids, Early Education DIY 61 Pcs Girls Toys	Toy arrived in printed cardboard box. Information in Chinese. 0-3 sign only. Possible food imitation issue. Small parts within the toy but no hazards / warnings labelling in place. Missing Conformity Markings Warnings -missing 3+ and small parts Failed test report EN71-1	BV test report: (5421)088-0047A 1/4/21 EN71-1: FAIL 4.9 protruding parts - puncture hazard 4.22 packaging does not have small balls warning EN71-1: noted missing labelling address, CE/UKCA mark, specific warnings and hazards		Unsafe
4	Baby Dolls Surprise Born Dolls Kids Toys For Children toys for girls	No address Missing Conformity Markings	BV Test report: (5421)088-0055A 29/3/21 EN71-1: PASS BV Test report: (5421)088-0055B 29/3/21 Phthalates: PASS		Illegal
5	5.7inch/14.5cm Kids Creative Toys Infrared Induction Robot Toy Fly Time 15 Mins Suspension Aircraft Toy With Rechargeable Gift For Kids Boys Girls Indoor Games	No address Charging cable/RC . Some battery information Missing Conformity Markings	Not tested		Illegal

No	Toy Title as seen on WISH	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on WISH	
6	2 Pcs/set Young Toddler Sisters Princess In Childhood Dolls Figure Toys Figure Toy	Toys arrived in plastic. No labelling. Small parts within the toy but no hazards / warnings labelling in place. The laboratory tested the toy for children over 36 months. However we consider the toy to be suitable for under 3 years and likely to fail EN71-1 if tested to this. Missing Conformity Markings Warnings -missing 3+ and small parts Failed test report Phthalates	BV Test report: (5421)088-0027A 9/4/21 EN71-1: PASS EN71-1: Noted missing labelling address, CE/UKCA mark, specific warnings and hazards BV Test report: (5421)088-0027B 9/4/21 Phthalates: FAIL		Unsafe
7	64/127PCS Magnetic Building Blocks Magnet Toy Magnetic Rod Ball Combination Design Toy Adult Relief Pressure Brain Training	Toy arrived in plastic. Barcode label only on tin. No other information. Strong magnets Small parts within the toy but no hazards / warnings labelling in place. Missing Conformity Markings Warnings -missing 3+ and small parts Failed test report EN71-1	BV Test report: (5421)088-0020A 29/3/21 EN71-1: FAIL 4.22 small balls; no warning 4.23 magnetic flux (156 kG2mm2) EN71-1: Noted missing labelling address, CE/UKCA mark, specific warnings and hazards		Unsafe
8	New 3/4/5mm 216pcs Magic Magnetic Cube Decompression Educational Toys DIY	No packaging. Barcode label only. No other information. Strong magnets Small parts within the toy but no hazards / warnings labelling in place. Missing Conformity Markings Warnings -missing 3+ and small parts Failed test report EN71-1	BV Test report: (5421)088-0023A 1/4/21 EN71-1: FAIL 4 general requirements 4.23 magnetic flux (57 kG2mm2) EN71-1: Noted missing labelling address, CE/UKCA mark, specific warnings and hazards		Unsafe
9	Montessori Educational Toy Wooden Tree Marble Ball Run Track Game Baby Kids Children Intelligence Education	Toy arrived in clear plastic bag with barcode label. No information on packaging or toy. Small parts within the toy (ball) The laboratory tested the toy for children over 36 months. However we consider the toy to be suitable for under 3 years and likely to fail EN71-1 if tested to this. Small parts within the toy but no hazards / warnings labelling in place. Missing Conformity Markings Warnings -missing 3+ and small parts	BV test report: (5421)088-0024A 29/3/21 EN71-1: PASS EN71-1: Noted missing labelling: address, CE/UKCA mark, specific hazards and warnings small balls/choking hazard		Illegal

No	Toy Title as seen on WISH	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on WISH	
10	Fun Sensor Diving Fish Luminous Electric Swimming Fish Toy for Baby Bathing Shower Children Kids Gift	Toy arrived in clear plastic bag with barcode label. No information on packaging or toy. No battery information. Button cell batteries but secure. Missing Conformity Markings Warnings -missing EN62115 warnings Failed test report EN62115	BV test report: (5421)088-0033A 2/4/21 EN62115: FAIL 13 mechanical strength of enclosures 14.6 accessibility to button cell batteries EN62115: missing labelling		Unsafe
11	Montessori Color Sorting Wooden Toys Hands Brain Training Clip Beads Math Toy Game for Children Children Early Education Toys	No address No CE mark Missing Conformity Markings	BV test report: (5421)088-0049A 29/3/21 EN71-1: PASS EN71-1: Noted missing labelling address, CE/UKCA mark		Illegal
12	Cute Cartoon Animal Clockwork Tortoise Baby Turtles Toys Infant Crawling Wind Up Toy Educational Kids Classic Toy (Random Color)	Toy arrived in printed plastic bag. Information in Chinese. There are no small parts within the toy Missing Conformity Markings	Not tested		Illegal
13	Inflatable Circle Newborn Neck Float Infant Baby Swimming Swim Ring Safety	Toy arrived in clear plastic bag with barcode label. No information on the packaging. No instructions. Adult supervision warning on the swimming ring. Query toy or swim aid; No other warnings or pictograms - likely to fail if tested to EN13138-1 buoyant aids for swimming instruction. Missing Conformity Markings Warnings -missing specific hazards in EN71-1 and EN13138 warnings Failed test report EN71-1	BV Test report: (5421)088-0054A 29/3/21 EN71-1: FAIL 4.18 potential danger warning should be in place 5.1 general requirements - small parts generated (fasteners detached in tension test) EN71-1: noted missing labelling: address, batch number, CE/UKCA mark, specific hazards - incorrect wording BV Test report: (5421)088-0054B 29/3/21 Phthalates: PASS		Unsafe

No	Toy Title as seen on WISH	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on WISH	
14	E-More Erasable Doodle Book, Portable Kids' Writing Drawing Board Toy Double-Sided Sketchpad Painting Book with 12 Colored Erasable Pens for Kids Toddlers Boys Girls Age 2 3 4 5 6 7 8 Year Old	No address CE mark is too small No age, No 0-3 sign, No warning sign Small parts within the toy but no hazards / warnings labelling in place. (coloured pens with lids) Missing Conformity Markings Warnings - Inaccurate 3+ and small parts	BV Test Report: (5421)040-0036A 11/2/21 EN71-1: PASS EN71-1: noted missing labelling address, CE mark too small, no UKCA mark, specific warnings and hazards BV Test Report: (5421)040-0036B 11/2/21 BS7272-1: PASS BS7272-2: PASS		Illegal
15	Baztoy Flying Ball, Kids Toys Remote Control Helicopter Mini Drone Magic Infrared Induction RC Flying Toy Christmas Birthday Party Gifts for Boys Girls Children Teenager Indoor Outdoor Garden Game	Labelling in place but 0-8 warning sign instead of 0-3 (illegal use of 0-3 sign) Warnings - Inaccurate 3+ logo Failed test report EN62115	BV Test Report: (5421)040-0027A 19/2/21 EN62115: FAIL 5.15 Tension test at 70N 9.4 bridged insulation 9.9 temperature rise 9.9 working requirements 15.1 absence of contact with moving parts 14.6 accessibility of button cells and type R1 batteries (remote control) 5.15 drop test (remote control)		Unsafe

No	Toy Title as seen on WISH	Non-Compliance & Verification Panel Comments	Test Results	Toy Photo as seen on WISH	
16	Dancing Captain America Toy Robot Hand Model Dance Hero Doll with Music Light	Everything in place except battery information. Warnings - missing EN62115 warnings Failed test report EN62115	BV Test Report: (5421)062-0023A 11/3/21 EN62115: FAIL 5.15 drop test 9.4 presence of a short circuit 9.9 temperature rises 15.1 absence of contact with moving parts EN62115: missing labelling various		Unsafe
17	The New York Doll Collection 11 inch/28 cm Soft Body Boy Baby Doll in Gift Box - Doll Dummy Included - Toy Dolls for Boys and Toddlers, B168	No EU address 0-3 sign too small Missing Conformity Markings	BV Test Report: (5421)046-0009A 18/2/21 Phthalates: PASS		Illegal
18	Pack of 2 Forest Animals Panda Torch Projectors, Educational Toy, Bedtime Story Toy, Perfect Party Favor Stocking Fillers, Great Gift for Children Kids Boys Girls, 2 Themes - Clear 48 images	No address batteries but no instructions Likely to fail EN62115 labelling requirements Missing Conformity Markings Warnings - missing EN62115 warnings	Not tested		Illegal



APPENDIX 2: THE TOP NON-CONFORMANCES







The top non-conformances found were:

Legislation	Non-Comformance	Number identified
TSD	missing address, CE mark – no traceability no compliance markings	216
EN71-1	missing warnings and hazards safety labelling	100
EN71-1	General requirements, small parts / balls for young children - choking	76
EN71-1	thin plastic packaging – suffocation	32
EN71-1	high strength magnets – colon damage and surgery	23
EN71-1	dangerous shape and size of components (protruding parts) - choking	14
EN71-1	cords, chains potential to tangle - strangulation	11
EN71-1	hemispheric shaped components - choking	4
EN71-1	straps intended to pass around the neck - strangulation	4
EN71-1	sharp points – penetration injuries	4
EN71-1	soft filled toys access to stuffing	4
EN71-1	assembly instructions missing	4
EN71-1	fixed loops – strangulation	3
EN71-1	Suction cups	3
EN71-1	projectile toys energy – eye injury	2
EN71-1	acoustics / wind toys – hearing damage	2
EN71-1	mouth actuated toys – choking	2
EN71-1	enclosures - suffocation	1
EN71-1	masks and helmets possible eye damage from broken glasses	1
EN71-1	rattles - choking	1
EN71-1	toys intended to be attached to a cot or cradle	1
EN71-1	sharp edges	1
EN71-1	Driving mechanisms	1
EN62115	missing warnings and hazards safety labelling	34
EN62115	temperature rises – burn injuries / fires	14
EN62115	access to batteries and button cells – throat and colon damage and surgery	11
EN62115	mechanical strength of enclosures – access to electronics / electric shock	10
EN62115	short circuit – overheating and possible fire	8
EN62115	tension and drop test failure	7
EN62115	working requirements (9.9)	6
EN62115	wire contact with moving parts	5
EN62115	abridged insulation – electrical shock	5
EN62115	reversed polarity test	1
EN62115	Non-detachable parts for protection	1
REACH	Phthalates content – restricted chemicals chronic conditions	7
EN13138	missing warnings and hazards safety labelling	1
BS7272	pen caps and end caps - choking	1







APPENDIX 3: STILL ON SALE








Still on Sale check for products subject to EU Safety Gate Recalls - conducted in September 2021.








Seemingly identical lines found for the following products from different sellers

Published	Report number	Alert Number	Description of Toy	Risk Type as shown on RAPEX	Platform / Project	Photograph
03/07/2020	27	A12/00932/20	Wooden Pink Tea Set	Choking, Suffocation	Ali Express	
21/02/2020	8	A12/00229/20	Plastic dolls	Chemical - Phthalates	Ali Express	
21/02/2020	8	A12/00240/20	Electric Walking unicorn	Strangulation	Ali Express	
21/02/2020	8	A12/00248/20	Magnetic blocks 110 piece set	Injuries - magnets	Ali Express	
28/02/2020	9	A12/00325/20	Electronics set	Choking	Ali Express	
28/02/2020	9	A12/00329/20	Kitoz marble run blocks	Choking	Ali Express	

Published	Report number	Alert Number	Description of Toy	Risk Type as shown on RAPEX	Platform / Project	Photograph
27/11/2020	48	INFO/00156/20	LED toy handbag	Choking / button cell batteries	Ali Express	
27/11/2020	48	INFO/00157/20	Plush Panda	Choking	Ali Express	
4/12/22020	49	INFO/00167/20	Lock box	Choking, cuts, suffocation	Ali Express	
10/04/2020	15	A12/00542/20	Make-up girls head	Chemical - Phthalates	Ali Express	
24/04/2020	17	A12/00613/20	Coloured toy gun	Injuries - projectiles	Ali Express	
27/11/2020	48	A12/01612/20	Crocodile	Choking	Amazon	

Published	Report number	Alert Number	Description of Toy	Risk Type as shown on RAPEX	Platform / Project	Photograph
04/10/2019	40	A12/1458/19	Rabbit backpack	Choking, Strangulation, Suffocation	Amazon	
04/10/2019	40	A12/1459/19	Floatation ring (aeroplane)	Chemical - Phthalates	Amazon	
04/10/2019	40	A12/1462/19	Wooden train set	Choking, injuries - magnets	Amazon	
01/11/2019	44	A12/1636/19	Light up Gloves	Button cell batteries	Amazon	
06/03/2020	10	A12/00359/20	Hoverball Amenon	Environment - Lead content	Amazon	
04/12/2020	49	A12/01668/20	Amosting magnetic shapes	Choking, injuries - magnets	Amazon	

Published	Report number	Alert Number	Description of Toy	Risk Type as shown on RAPEX	Platform / Project	Photograph
04/12/2020	49	A12/01694/20	Threading Big Apple	Strangulation	Amazon	
04/12/2020	49	A12/01699/20	Wooden ribbon teething ring	Choking	Amazon	
25/12/2020	52	A12/01922/20	Magnetic shapes	Injuries - magnets	Amazon	
25/12/2020	52	A12/01921/20	Sunshine inflatable baby ring seat	Choking	Amazon	
10/04/2020	15	A12/00536/20	Fidget Box (oleole)	Chemical - nickel	Amazon	
23/10/2020	43	A12/01411/20	Plastic Mermaid dolls	Chemical - Phthalates	eBay	
06/11/2020	45	A12/01449/20	Magnastix	Choking, injuries - magnets	eBay	

Published	Report number	Alert Number	Description of Toy	Risk Type as shown on RAPEX	Platform / Project	Photograph
20/11/2020	47	A12/01568/20	Toy drum set	Choking, damage to hearing	Ebay	
04/12/2020	49	A12/01696/20	Bath Spray Water Toy	Choking	Ebay	
11/12/2020	50	A12/01755/20	LED bear	Button cell batteries, Choking, Injuries, Strangulation	Ebay	
11/12/2020	50	A12/01756/20	Dancing Princess	injuries - mechanism	Ebay	
11/12/2020	50	A12/01767/20	Crawling doll	Chemical - Phthalates	Ebay	
04/12/2020	49	A12/01697/20	Set of Sensory Toys	Choking	Ebay	
10/04/2020	15	A12/00531/20	Plastic Rattles set	Choking	Ebay	

Published	Report number	Alert Number	Description of Toy	Risk Type as shown on RAPEX	Platform / Project	Photograph
01/05/2020	18	A12/00652/20	Singing Shark plush	Button cell batteries, choking	Ebay	
17/04/2020	16	A12/00572/20	Musical Instruments	Choking, Suffocation	Ebay	
13/03/2020	11	A12/00390/20	Kitchen plastic play set 80pcs	Choking	Ebay	
28/02/2020	9	A12/00293/20	Magnetic blocks 204 piece set	Choking, injuries - magnets	Ebay	
28/02/2020	9	INFO/00035/20	Magnetic blocks 100 piece set	Choking, injuries - magnets	Ebay	
13/03/2020	11	A12/00391/20	Small firetruck	Choking	Ebay	
13/03/2020	11	A12/00395/20	Magic water doodle mat	Choking	Ebay	

APPENDIX 4: THE CROCODILE STORY

One particular product demonstrates the issues found with the platforms' handling of product issues. The original product was purchased in 2018 and formed part of the BTHA initial report. Since then its presence and availability on the platform concerned has been regularly checked and further samples have been purchased at regular intervals.

Date	Action	Comment
July 2018	The original sample was purchased and assessed. The product included a zip opening giving access to the stuffing material inside which is a fail to EN71-1 toy safety standard. There was no labelling with CE marks or EU address details.	
18th Sept 2018	Reported to Amazon	
8th Nov 2018	Amazon confirmed ASIN number has been taken down	Original product number was removed from sale
13th Nov 2018	Amazon advertise the same line to us by email	
12th Dec 2018	Toy was sent for independent testing	
14th Dec 2018	Amazon advertise the same line to us under the "Baby Store" heading	
8th Jan 2019	Two further crocodiles were purchased and found to be illegal in the same way (different ASIN numbers and sellers)	Reported to Trading Standards
18th Jan 2019	Test report results - Failed EN71-1 5.1 small parts - zip puller detached & 5.2c access to stuffing through zip	Reported to Trading Standards
22nd Jan 2019	Failures reported to Amazon	No further action taken we are aware of
April - May 2019	When checked numerous identical photographs and products still on sale	
13th June 2019	Crocodile still available and now highlighted as the platform's "choice" of purchase	
6th Sept 2019	New sample purchased for different seller with the same illegal zip closure	Reported to Trading Standards
9th Oct 2019	2 further samples were purchased one fulfilled by the platform themselves which arrived with a zip closure	Platform fulfilled product info on advert states: "Warning: Not suitable for children under 36 months" which is illegal. Product arrived in plain box with an incorrect CE mark and a barcode Crocodile had a care label stating: "Not suitable for children under 6 years old it contains widgets. So please keep your children not putting it in the mouth, it is dangerous if swallowed by a child." No EU address / model number. Zipper opened directly to stuffing
Nov 2019	Further searches revealed 277 pages with between 3 and 6 products identical products per page. This equates to 800 -1600 products that are likely to be the same. 23 toys were researched in detail from this list all looked identical. 13 actually showed the zip closure in advertising photographs	Reported to Trading Standards - to be "investigated" by platform. No further action taken we are aware of.
13th Nov 2019	Some versions were advertised as pillows and were submitted for UK Fire & Furnishings testing which it failed	Reported to Trading Standards
January 2020	OPS&S starts supporting the BTHA with product Safety Gate recalls	The Crocodile has been determined as "high" risk and not "serious" and has not been included in Safety Gate recalls.

Date	Action	Comment
March 2020	Same product found on sale from the original seller	
1st May 2020	Crocodile listed on RAPEX	Recalled due to zip small part
13th May 2020	Crocodile search finds numerous identical photographs, one sample purchased and submitted for EN71-1 testing and fails 5.1 small parts – zip puller detached & 5.2 access to stuffing through zip	
20th September 2020	No notification received as purchaser by BTHA.	
7th December 2020	Amazon advertise to us under last minute Christmas deals	Advertisement from platform
8th December 2020	The Crocodile appears in Channel 4's "The Truth about Amazon" and fails testing	
15th February 2021	New sample purchased in BTHA Project 3 and fails EN71-1 and Fire & Furnishings flammability testing	

APPENDIX 5: TRADITIONAL RETAIL CHECKS COMPARED TO NEW MODELS OF SUPPLY

Online marketplaces supply products in different ways. In certain models, the host company (which owns and operates the platform) sells products which it has purchased for onward sale. However, in other models, product lines are loaded onto the platform by third-party sellers directly. These sellers are, in many cases, not based within the EU and are therefore difficult to contact, work with or, in the case of enforcement, prosecute. These product lines are found on the platforms' "marketplace" and listed with no (or very little) pre-listing controls. Accordingly, any product can be uploaded whether or not it complies with the product safety laws of the jurisdictions in which the products are being sold.

In the 'offline' world, toy makers and retailers have legal obligations and responsibilities to ensure that the toys they sell are safe and legally compliant. Furthermore, they have additional obligations if they are found to be selling an unsafe product. A retailer would be termed a "distributor" in many cases when selling a third-party line in the offline world. As a distributor they would have set obligations to check labelling and cooperate with enforcement authorities. Where an offline retailer stocks a product that has no European representation they would adopt the role of an "importer" which has further obligations and a requirement to add their address as the primary point of contact for the EU, so the product can be traced if there is a problem.

In contrast, the platforms themselves generally do not accept that they have any legal obligation to check the safety of the items being sold by third-party sellers on the marketplace as they do not consider they are any of the 'economic operators' who have various duties to ensure compliance with the Regulations (See the summary of the current legal framework below). It is the third-party vendor who sells to the consumer who is legally responsible for the safety of the product but overseas sellers fall outside current UK enforcement areas, so often do not meet the same basic safety requirements.

This approach to liability does not however reflect the reality of how transactions are completed via online marketplaces, including the fact that marketplaces frequently restrict the content and mechanisms for contact between vendors and purchasers to marketplace-approved channels and messaging services. Marketplace terms also often: (i) require vendors to act in a way which is not prejudicial to the marketplaces' customers (i.e. rather than being identified as customers of the vendor); (ii) provide for the evaluation of vendors' performance; (iii) and preclude the directing of customers away from the platform to complete transactions, such as to their own selling sites. The marketplaces are accordingly an integral part of the supply chain in defective and/or non-compliant toys being made available in the UK market and the BTHA considers it is artificial to treat transactions arranged via online marketplaces, for liability purposes, as involving only the consumer and third-party vendor.

A summary of the current legal framework for toys

EU-wide toy safety standards are currently governed by the Toy Safety Directive³ ("the Directive") which was implemented into UK legislation by the Toys (Safety) Regulations 2011⁴ ("the Regulations"). After Brexit the Toy Safety Directive was replaced by the 2011 No. 1881 The Toys (Safety) Regulations 2011 which are currently identical.

The Regulations impose obligations on four types of 'economic operators' who might be involved in the supply chain and who market, place or make a toy available on the EU market. They are:

- manufacturers;
- importers;
- distributors; and
- authorised representatives (who might be appointed by a manufacturer for the purpose of having an EU presence).

³Directive 2009/48/EC

⁴SI 2011/1881

A full definition of each role can be found in Appendix 4.

The Regulations prescribe certain safety standards (such as the need for warnings about any hazards or risks associated with a toy). The Regulations prescribe certain obligations for each of the economic operators and prohibit the placing of toys on the EU market unless they comply with the safety requirements in the Directive.

Under the Regulations, the 'manufacturer' has primary responsibility to ensure conformity with the safety requirements and for the toy (or its packaging) to be marked with the correct safety warnings and the manufacturer's name and a single address at which the manufacturer can be contacted.

However, an 'importer' has a duty to ensure the manufacturer has complied with its various obligations and the importer must also ensure that its name and address is also marked on the toy (or its packaging/

accompanying documentation). The value of having an address within the EU is that it increases traceability for buyers/enforcement agencies in the event that something goes wrong.

Distributors have more limited obligations but nevertheless have a duty to act with due care in relation to the compliance of toys they make available on the EU market. This includes the duty to verify that the manufacturer and importer correctly labelled the product as above in the language of the country where the product is to be sold.

Currently there is a lack of clarity as to the role of the online marketplace in the overall supply chain. As a result, they do not take steps to discharge the various obligations attached to those roles.

APPENDIX 6: SAFETY MEASURES IMPLEMENTED BY THE PLATFORMS

Date of implementation in the UK	Platform	Action
April 2020	Amazon	Toy vendors have additional requirements to show genuine product images and Declarations of Conformity



APPENDIX 7: COVERAGE OF UNSAFE AND COUNTERFEIT TOYS AND THE INJURIES THEY HAVE CAUSED

US boy has colon removed after swallowing 13 magnets from toy bought on Amazon

<https://www.thesun.co.uk/news/8093734/boy-swallows-magnets-amazon-colon-removed/>

Young girl is 'poisoned by deadly ARSENIC' after playing with banned Chinese magnetic putty toy her mother bought on Amazon

<https://www.dailymail.co.uk/news/article-5412761/Girl-poisoned-ARSENIC-playing-Amazon-toy.html>

Mum scarred for life after buying fake toy wand for son off eBay private seller

<https://www.mirror.co.uk/news/uk-news/mum-scarred-life-toy-wand-21206369>

Magnetic putty removed from Amazon and recalled after safety fears

<https://inews.co.uk/news/consumer/putty-toy-amazon-product-recall-crazy-geezer-safety-magnet/>

Slime toys sold on Amazon found to have unsafe toxic chemical boron

<https://inews.co.uk/news/consumer/slime-toys-uk-safety-boron-levels-which-toxic-chemical/>

Fake slime pulled from Amazon over safety fears

<https://www.thesun.co.uk/money/8409282/amazon-pulls-crazy-geezers-putty-world-toy-from-sale-over-fears-it-is-dangerous-for-kids/>

Warning over "gel blaster" toy guns

<https://www.dailymail.co.uk/health/article-7124033/Two-boys-narrowly-avoid-blinded-gel-blaster-toy-guns-scratched-corneas.html>

Fake Assassin's Creed toy bought on Amazon leaves boy partially blind

<https://www.mirror.co.uk/news/uk-news/boy-left-partially-blind-after-9495798>

Amazon wins case after hoverboard bought on marketplace burns house down

<https://www.cnbc.com/2018/06/02/amazon-not-liable-for-exploding-hoverboard-marketplace-argument-wins.html>

Unsafe Products coverage

Deadly teddy bears sold on Amazon seized and destroyed

<https://www.thesun.co.uk/money/7659700/deadly-teddy-bears-seized-trading-standards-spot-fake-goods/>

Children's bath toys for sale on Amazon "contain dangerous levels of chemicals linked to male infertility"

<https://www.thesun.co.uk/money/10319711/amazon-toys-chemical-male-infertility/>

Trio of toy balls sold on Amazon recalled because kids could choke on them

<https://www.thesun.co.uk/money/9714758/amazon-toy-balls-recalled-choking/>

Toy lightsabers sold on Amazon recalled because they contain poisonous lead

<https://www.thesun.co.uk/money/9713958/toy-lightsabers-sold-on-amazon-recalled-because-they-contain-poisonous-lead/>

Magformers urges retailers to boycott copycat products

<https://toyworldmag.co.uk/magformers-urges-retailers-to-boycott-copycat-products/>

Denmark test: Unwanted chemicals in toys from eBay, Amazon and Wish

<https://kemi.taenk.dk/test/test-unwanted-chemicals-toys-ebay-amazon-and-wish>

2019.08.12 Recall: Storm Off-Road 4WD (remote-controlled toy car)

<https://www.stockton.gov.uk/trading-standards/topics/details?id=327823&category=safety-news>

<https://www.amazon.co.uk/4WD-Storm-Monster-Truck-Blue/dp/B07G9J35Z2/>

[ref=sr_1_1?keywords=Storm%2BOff-Road%2B4WD&qid=1565789315&s=gateway&sr=8-1&th=1](https://www.amazon.co.uk/4WD-Storm-Monster-Truck-Blue/dp/B07G9J35Z2/ref=sr_1_1?keywords=Storm%2BOff-Road%2B4WD&qid=1565789315&s=gateway&sr=8-1&th=1)

Amazon and eBay urgently recall kids' products over 'serious' safety fears

<https://www.dailypost.co.uk/news/north-wales-news/amazon-ebay-urgently-recall-kids-17057011>

Amazon and eBay "listing unsafe toys for sale"

<https://www.bbc.co.uk/news/business-50478221>

Amazon stops selling 'toxic' goods for children in US

<https://www.bbc.co.uk/news/technology-48227137>

Amazon "unable or unwilling" to effectively police third-party sellers on its site – leading to thousands of banned, unsafe and mislabelled products

<https://www.wsj.com/articles/amazon-has-ceded-control-of-its-site-the-result-thousands-of-banned-unsafe-or-mislabeled-products-11566564990>

How Amazon escapes liability for the riskiest products on its site

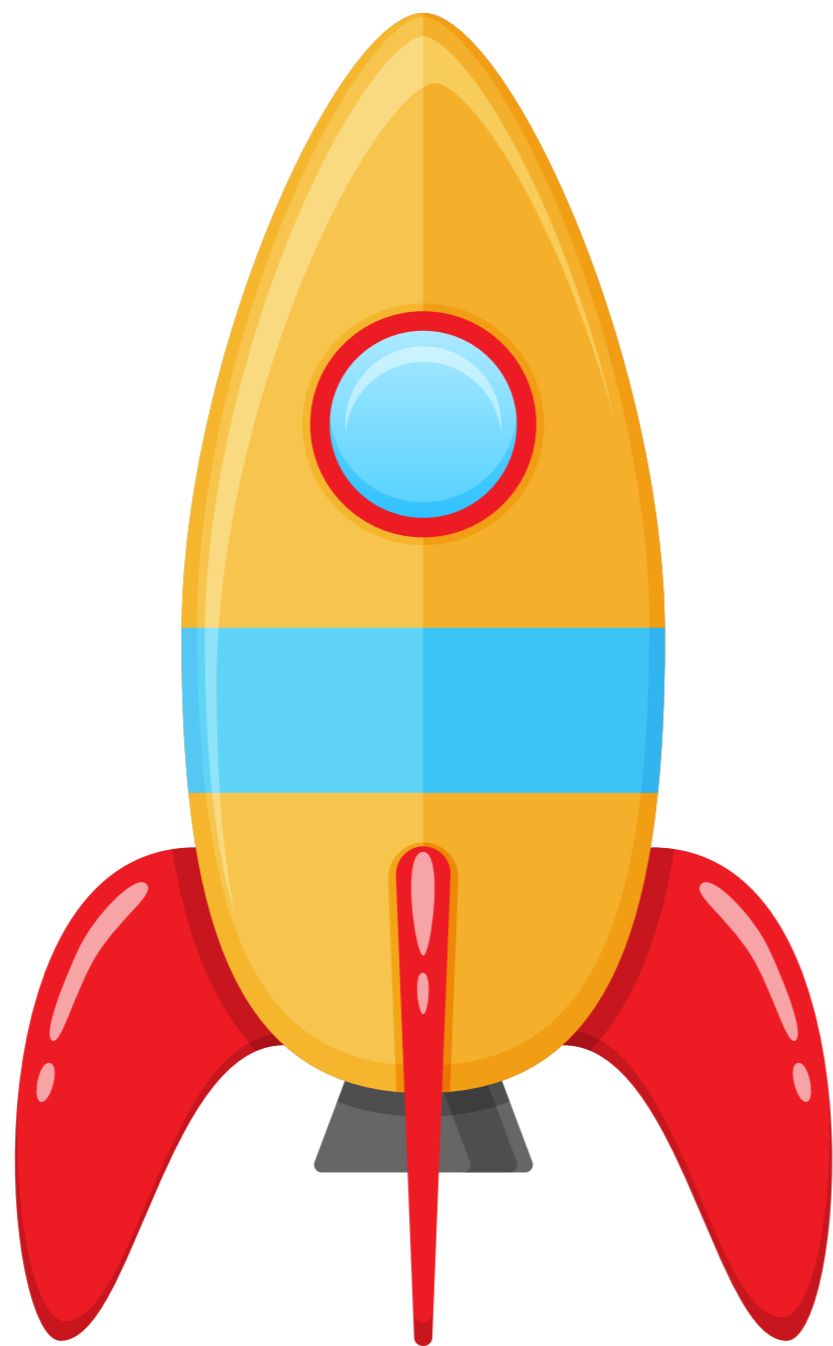
<https://www.theverge.com/2020/1/28/21080720/amazon-product-liability-lawsuits-marketplace-damage-third-party>

Fake and dangerous kids products are turning up for sale on Amazon

<https://edition.cnn.com/2019/12/20/tech/amazon-fake-kids-products/index.html>

Some toys sold online don't meet U.S. safety standards: "Our children should not be the testing grounds"

<https://www.cbsnews.com/news/online-shopping-toys-sold-on-amazon-may-not-meet-us-safety-standards/>



APPENDIX 8: CONSUMER TIPS

Don't toy with children's safety

Guidance from the BTHA on buying toys from online platforms;

- Do some research before you purchase. Search for the company/brand that makes the toy or character you want to buy and then include the company name when you search the online marketplace.
- Research the toy – make sure it has not been recalled and look to make sure there are no news stories about safety concerns⁵
- Exercise caution when buying from third-party sellers on online marketplaces. All the toys which were non-compliant with the Toy Safety Directive in our study came from third-party sellers. They are often not held accountable for the safety of the products they sell in the same way as UK brands and bricks-and-mortar / direct online retailers and shops. (Third-party sellers are the sellers behind the main branded website). Do not assume that the platform has conducted any tests or checks on these lines.
- Look at reviews and be aware of who you are really buying from;
 - Some reviews are false and generated by computers. Check all reviews particularly the not so good ones that may be more likely to be genuine.
 - Do they have a track record of selling toys? – if not, be cautious.
 - Do they have good reviews for the toys they have sold in the past? – if not, be cautious.
 - Do they have a UK/EU address listed on the site? – if not, you should question your purchase; you may have difficulty contacting anybody if you have problems and having a UK/EU address is currently a legal requirement to sell toys in the UK. If the seller doesn't know this, what else didn't they know when

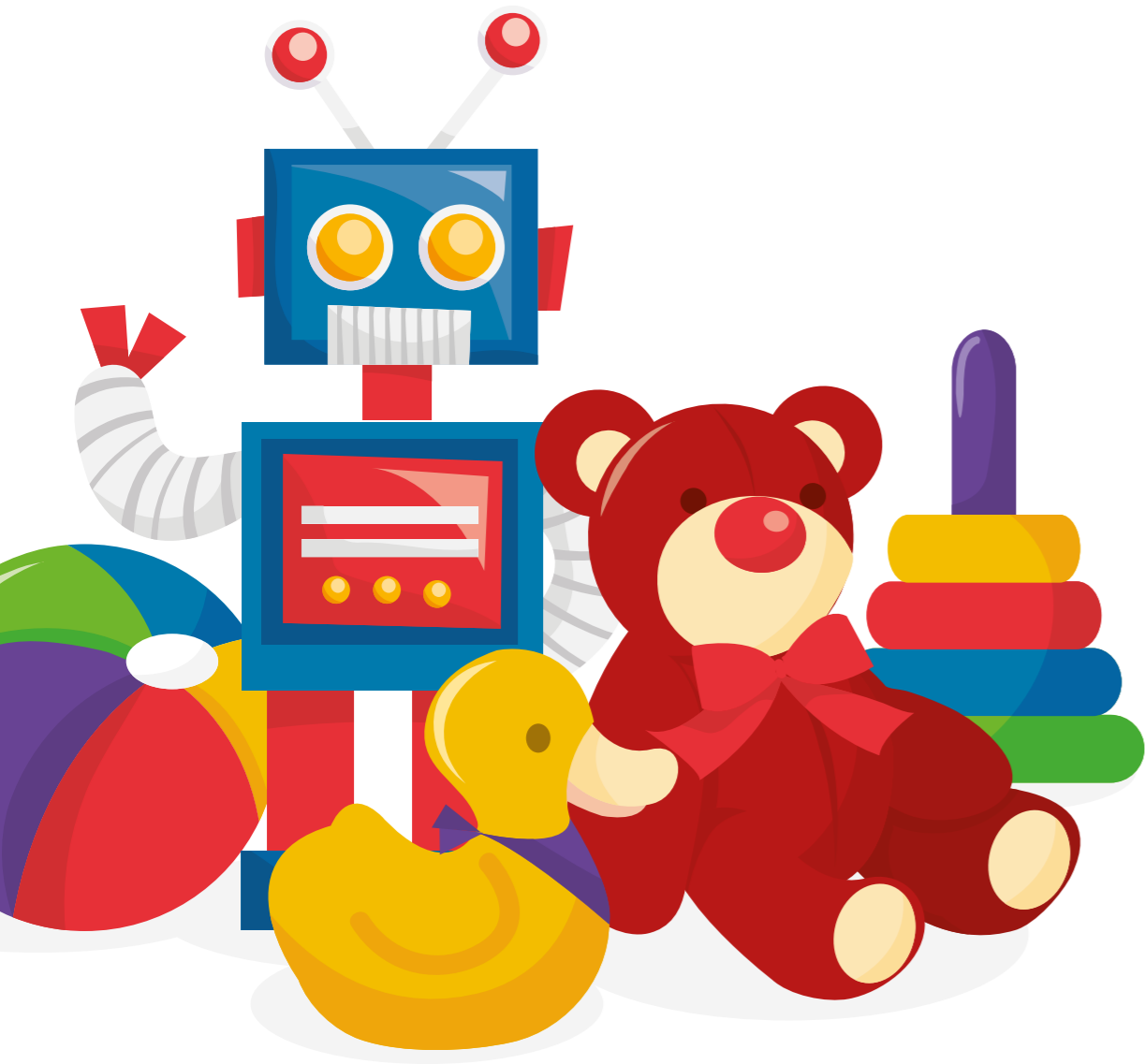
making the toy you are about to buy?

- Do the pictures of the child in the marketing match the age warnings on the product?
- Be careful of going for the lowest price – if something looks too good to be true, it probably is. The price could be lower due to a number of factors;
 - Counterfeit product – not made to the same standards as the original and will be illegal for sale in the UK and may also have the issues below.
 - Cheaper material and design that is less durable or unsafe, e.g. high levels of restricted chemicals.
 - Correct legal testing and assessments of products is very expensive and means genuinely safe products can cost more to manufacture.
- Buy from BTHA members (<https://www.btha.co.uk/about-us/#members>). Members sign up to an annual code of practice including commitments on toy safety and toys may carry the Lion Mark symbol to denote they are members. In our study no genuine member product failed any of our safety testing. A number of counterfeit products were identified and our members have reported those to the platforms for removal.
- To spot a counterfeit, look out for a product that is cheaper than normal, know who owns the brand and look for their name on the packaging, look for phrases like "compatible with (brand name)", these are often made to look like the original but will not be genuine.
- Once you have made your purchase, immediately check your confirmation receipt. Check the source of the product is who you thought you had bought from. If you have bought from a third-party it will be listed on this receipt.
- When you receive your purchase, and importantly, before you give it to your child –

⁵<https://www.tradingstandards.uk/consumers/product-recalls-and-safety-notices>

- Check it has an EU address.
 - Check it has a CE mark.
 - Check the age labelling is appropriate for the age of the child that it is for, as we found in our study small parts that could be a choking hazard for young children that were incorrectly labelled as not suitable for under 3 years.
 - Check it has relevant warnings (e.g. toys not for babies should state "not suitable for under 3's" (or the equivalent symbol)).
 - Packaging generally – does it look genuine, is the print correct, are warnings and labels in the correct language, etc?
 - Many illegal toys we purchased were delivered without any packaging or information at all which means there is no address to contact and no warnings that may be critical for safe play.
- When you give the toy to your child make sure you watch them open it and the toy inside is as expected, look out for small parts that were not meant to be there, that there is no access to stuffing materials, that batteries are not supplied loose in the product, that battery compartments are secure when using small batteries or button cells and be careful with small accessible magnets which can be swallowed.
 - Some products we purchased were listed as toys but were actually for adults (collectible toys or ornaments) these items do not have to comply with toy standards, be careful and make sure the toy is appropriate for your child.
 - Supervise your child during the initial play. Many of the illegal toys we found broke very quickly releasing dangerous small parts or gel contents.
 - If you think the toy you have bought is unsafe or illegal write a review to warn other purchasers and talk to your local Trading Standards

If any of these cause doubt or are missing, it is more likely that the toy is at risk of being illegal or unsafe, we would recommend you return it.



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T O Y &
H O B B Y
A S S O C I A T I O N