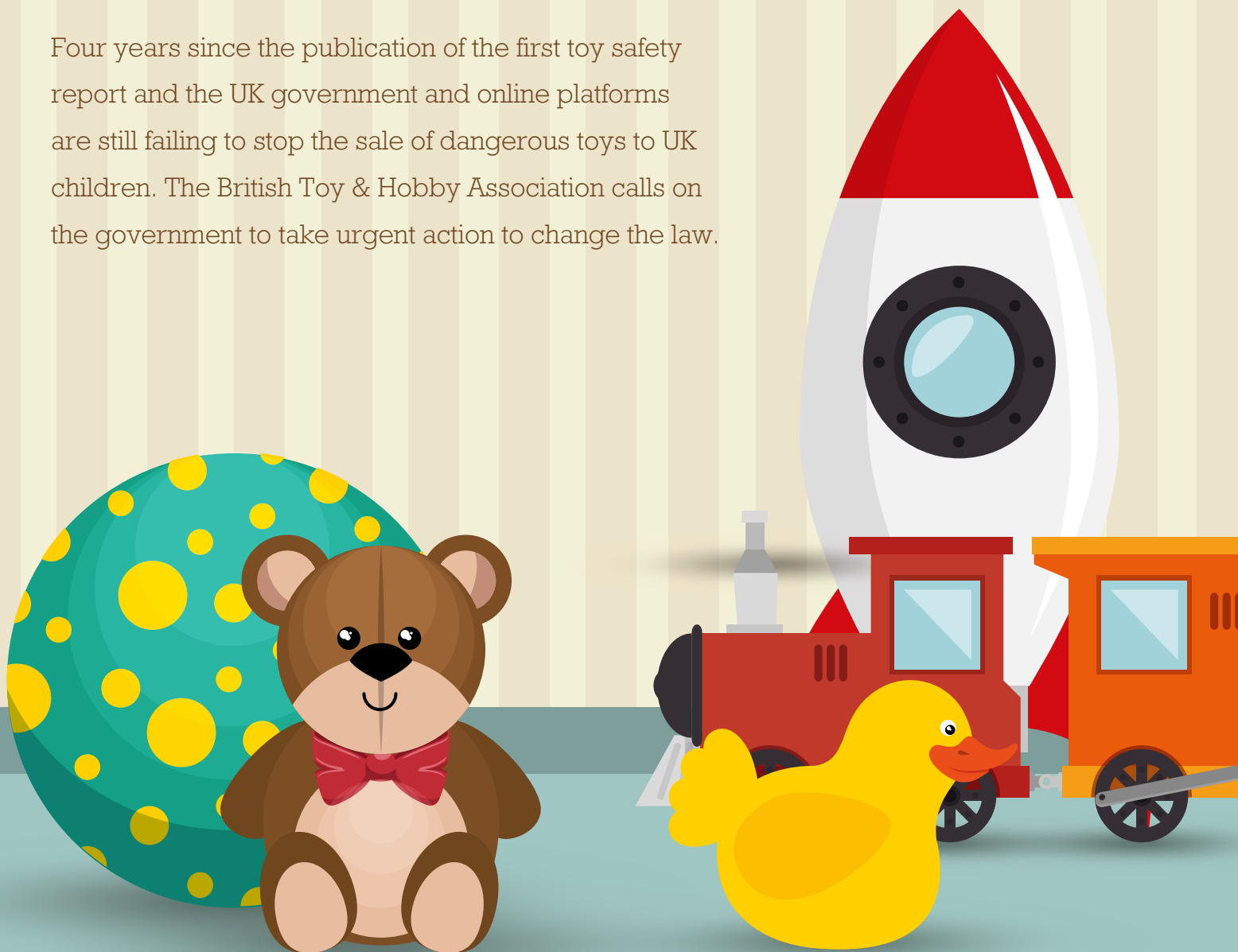


STILL toying with children's safety.

Project update – 25 October 2022

Four years since the publication of the first toy safety report and the UK government and online platforms are still failing to stop the sale of dangerous toys to UK children. The British Toy & Hobby Association calls on the government to take urgent action to change the law.



THE TOY STORY

In 2018 members of the British Toy & Hobby Association (BTHA) reported that they were concerned about the safety of toys sold via online marketplace platforms that, in their opinion, did not look like they were made to UK toy safety regulations.

The BTHA started testing a range of toys sold by third-party sellers via online marketplaces and found unacceptable levels of illegal and dangerous toys unknowingly being sold to UK consumers. For the last four years, the BTHA has annually tested and reported its results to the online marketplaces, government, the Office for Product Safety and Standards, and Trading Standards, as part of its commitment to identify and stop the sale of unsafe toys.

Another 12 months has passed since the BTHA's last publication investigating toys sold by third party sellers on AliExpress, Amazon, eBay, and Wish. Sadly, this updated report shows that the situation has not improved, and the four online marketplaces are continuing to facilitate the sale by third parties of worrying levels of dangerous toys to unsuspecting consumers.

When purchasing from global online platforms, consumers often believe they are buying from the trusted retailers and that somewhere in the process safety checks will have been made on the products sold. However, unbeknown to consumers, there is currently no legal requirement for online marketplaces to check the safety of products that other sellers are listing on their sites.

In November 2021, the UK government issued a safety message to consumers highlighting the risks when purchasing from third party sellers¹. Following the UK's departure from the European Union, the UK Government now has full control over its product safety laws and the BTHA believes the Product Safety Review provides an opportunity for the UK government to be world leading in making online marketplaces safer.

Children in the UK are at risk of death or serious injury from the continued sale of unsafe toys. This report shows the current voluntary approach is not working to stop the sale of unsafe products by third party sellers. The BTHA calls on the government to take urgent action to regulate these sellers and online marketplaces before there is a fatality.



¹ <https://www.gov.uk/government/news/government-issues-online-sales-product-safety-message>

THE RESULTS

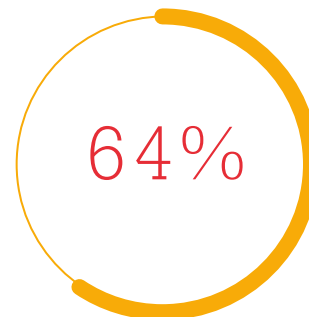
The latest 2022 study of third-party sellers via online marketplaces has found:



of toys tested were
illegal to sell in the UK



of toys tested were
unsafe for a child to
play with



of notified toys to the UK Unsafe
Product Report from 2021 study
have seemingly identical listings
still for sale

The resultant injuries that could have been caused by the unsafe and non-compliant toys identified ranged from choking and strangulation, burns, and chemical poisoning, 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 40 products is in [appendix 1](#).

Summary of results for the additional **40 products** tested in the summer of 2022:

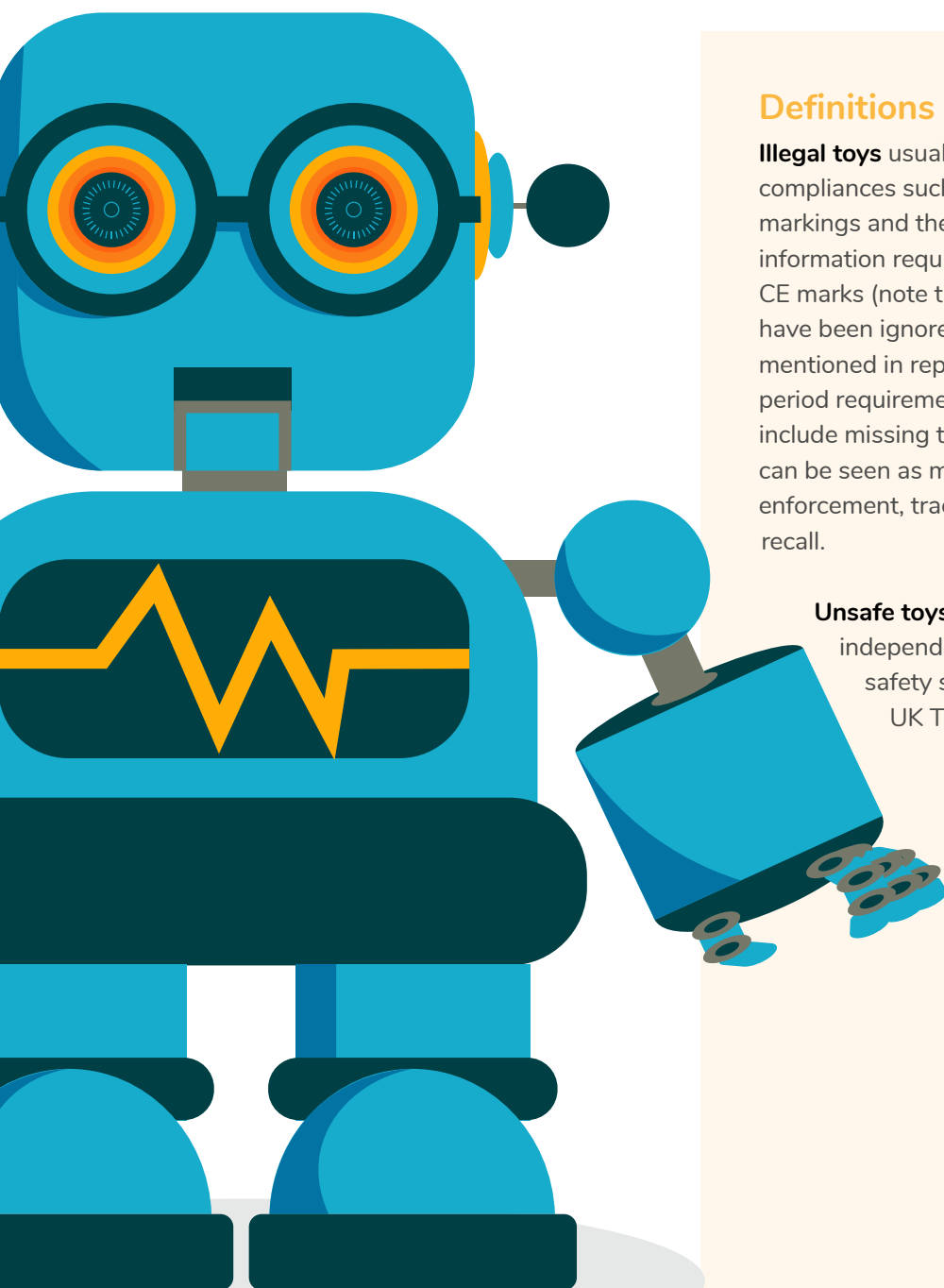
Results		Independent laboratory testing		Total	
Platform	Sample size	Tested	Failed Test	% Unsafe	% Non-compliant
AliExpress	10	10	9	90%	100%
Amazon	10	10	8	80%	100%
Ebay	10	10	9	90%	100%
Wish	10	10	10	100%	100%
Total	40	40	36	90%	100%

The full list of reasons for non-conformances is provided in [appendix 2](#).

THE METHODOLOGY

The 40 toys were selected at random and purchased by a non-toy trade purchaser with the only guide being to get a wide range of different types of toys from third-party sellers. As with previous years, counterfeit lines were not actively sought out.

On delivery, toys were analysed based on the pack labelling to see whether they displayed the appropriate warnings, the CE mark, EU and UK addresses, and item codes. Toys without the legally required labelling were determined as “illegal”. Testing was conducted by an accredited third-party test laboratory. Due to the smaller sample size, the BTHA opted to put all 40 toys through independent safety testing, and it was possible to test for more than one high risk hazard presented by the toy. Some toys were tested for both EN71-1 (Mechanical & Physical) and EN62115 (Electrical Toy Safety) or EN71-1 and a chemical restriction from REACH Annex XVII such as phthalates. In previous reports only selected samples were tested due to cost but it has always been the BTHA’s assertion that if more testing was able to be conducted more toys categorised as “illegal” would be determined to be “unsafe”.



Definitions

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 are those that failed an independent test against current toy safety standards designated under the UK Toy (Safety) Regulations 2011.

EXAMPLES OF MOST DANGEROUS TOYS

A Bag of Rabbit & Dog & Hamster & Cat & Avocado Pudding Doll Plush Japanese Animation Sumikko Gurashi Toy Soft Pillow Children Girl Gift

Found on: AliExpress

The dangers: This toy has 152 times the legal limit of a restricted phthalate that can cause adverse reproductive and other health effects. In addition, it is not marked with warnings to restrict it to over three years but generated small parts during testing which could cause choking.



Fairy Craft Lanterns Toys for Kids- DIY Light Up Terrarium Craft Kit with Unicorn & Mermaid Toys for Children Age 5 6 7 8 9 10 11 12 Remote Control Night Light Craft Gifts for Girls, Boys and Adults. Brand: WOLGYING

Found on: Amazon

The dangers: This toy contains sharp points that can cause cuts or potentially damage to eyes, inadequate labelling, thin plastics that can cause suffocation and has accessible button cell batteries that can be swallowed resulting in burning and damage to the oesophagus and surgery.

Montessori Toys for 1 2 3 Year Old Toddlers Educational Number Letter 75pcs

Found on: eBay

The dangers: This toy is not marked with warnings to restrict it to over 3 years but contains small parts and small balls which could cause choking for young children and cords that could cause strangulation.



Unisex Boy and Girl New 5PC Drum Musical Instruments Band Kit Kids Toy Gift Set

Found on: Wish

The dangers: This toy fails acoustic testing which could affect a child's hearing, and generated small parts which could cause choking for young children.



THIS IS NOT A NEW ISSUE

The BTHA has shown over four years and testing more than 550 toys² that this is an ongoing issue and the level of non-compliant and unsafe toys sold by third-parties through the online marketplace supply chain is unacceptable. Despite voluntary action by the online marketplaces and increased government enforcement in the last 12 months the situation has not improved and will not be resolved without further regulation to make the online marketplaces more accountable for product safety.

The table below outlines the results of toys bought from third party sellers via four online marketplaces from 2018 to 2022.

Project	Sample size	Illegal	Unsafe	Total non-compliant	Tested	Failed Test	% Unsafe	% Non-compliant
1	150	70	45	115	34	23	30%	77%
2	100	25	60	85	72	53	60%	85%
3	255	103	122	226	184	122	48%	88%
4	40	40	36	40	40	36	90%	100%
Total	545	238	263	466	330	234	48%	86%

The full results from previous projects can be found on the [BTHA website](#).

STILL ON SALE

In the BTHA's 2021 project that tested 255 toys, a total of 101 toys were notified to the UK Unsafe Product Report from September 2021 to March 2022. 58 were notified to the Unsafe Product Report with a corrective measure of recall required from end users, seven with a measure of withdrawal of the product from the market, and 36 with a measure of removal of the listing by the online marketplace.

The BTHA investigated the 101 notified lines on each individual platform to identify seemingly identical lines that are still on sale.

'Seemingly identical' lines are those that use the same photographs and packaging to the recalled lines. An initial assessment has also been made on the likelihood of the notification issue occurring based on the toy marketing and description seen online. The BTHA accepts that these products could be a different model entirely, or the manufacturer could have updated their product and made it compliant since the initial notification was issued.

In total, out of the 101 notified toys, **65 seemingly identical lines were found on sale**, with seven lines sold by the original seller, on the original marketplace. The full analysis can be found in [appendix 3](#).

The BTHA test purchased two seemingly identical products on each of the four platforms specified in [appendix 4](#) to conduct further testing by an independent laboratory to assess whether the seemingly identical toy fails the same compliance tests.

All eight seemingly identical toys failed toy safety testing – six toys for the same reason as 2021, and two for different reasons.

The full results of the seemingly identical toys can be found in [appendix 4](#).

² <https://www.gov.uk/government/news/government-issues-online-sales-product-safety-message>

VOLUNTARY ACTION IS NOT WORKING

The BTHA has been evidencing the high levels of unsafe toys being sold by third-party sellers for four years and the latest results show that the situation is not improving. Each time, the BTHA has informed the online marketplaces, the Office for Product Safety and Standards, and trading standards about all illegal and unsafe toys.

In most instances, the online marketplaces have analysed the BTHA's results and removed the identified toys the BTHA reported from sale. However, the BTHA's reports over the years show that seemingly identical toys that were previously notified to the EU Safety Gate, and now UK Unsafe Product Report with corrective measures including recall are listed for sale, sometimes by the original seller, or by other sellers. In instances where the BTHA has been able to test seemingly identical toys, the results show that often these toys fail on the same thing demonstrating that the online marketplaces have often not prevented listings from reappearing even on a reactive basis.

Despite the knowledge that illegal and unsafe toys are being placed on the UK market via online marketplaces, the lack of an adequate legal framework means that online marketplaces continue to get away with facilitating the sale of unsafe products to consumers. Three of the four online marketplaces (AliExpress, Amazon, and eBay) included in the BTHA's testing have been signatories to a European Product Safety Pledge since 2018 – almost the same time as the BTHA has been testing toys.

Increasingly, online marketplaces publicise the proactive measures voluntarily put in place to block suspect listings, and due to the Office Product Safety and Standards increased enforcement action, thousands of unsafe products have been removed from sale since last year. The BTHA welcomes any proactive measures and the increased enforcement action by the Office for Product Safety and Standards that target unsafe products, but the volume of the issue means that none of these measures have stopped us finding unacceptable levels of non-compliant and unsafe toys listed on online marketplaces.

CALLING FOR GOVERNMENT ACTION

The current system is not working to prevent unsafe toys entering the UK market. The government need to impose legal and regulatory change to make online marketplaces more accountable for the legality and safety of products sold through their platforms by third-party sellers. Now the UK has left the European Union, and has full control of its product safety laws, the Product Safety Review provides an opportunity for the government to become world leaders in the regulation of online marketplaces, protecting companies, consumers, and the economy.

It is the BTHA's view that the government's forthcoming Product Safety Review and consequent legislation needs to reflect changing shopping patterns to ensure that the online marketplaces are jointly and severally liable for products sold by third-parties via their platforms, which otherwise would not have access to the UK market. Through such legislative change, the burden of enforcement action against third-party sellers can be moved to online marketplaces rather than consumers or Trading Standards.

The BTHA continues to raise awareness of this issue with consumers and offers advice on purchasing toys safely when shopping on online marketplaces to try and keep consumers safe until there is regulatory change.

ABOUT THE BTHA

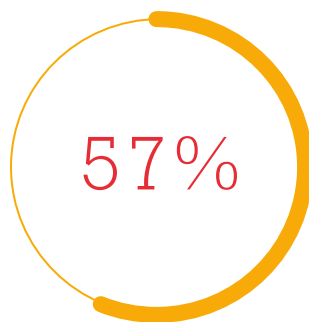
- Founded in 1944, the British Toy & Hobby Association (BTHA) is the official organisation representing toy manufacturers. The BTHA's members range from large international toy firms to small family-run businesses.
- Membership of the British Toy & Hobby Association shows the member's commitment to adhere 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 THE [NPD GROUP](#)



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



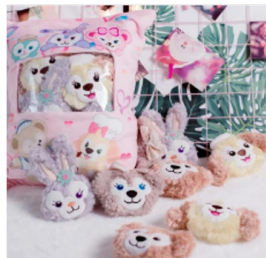
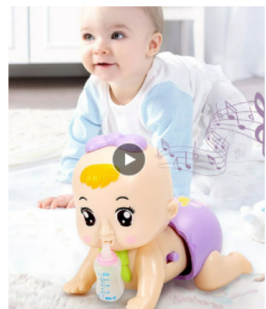
Online sales of toys are increasing year on year and accounted for 57% of total toy sales last year.



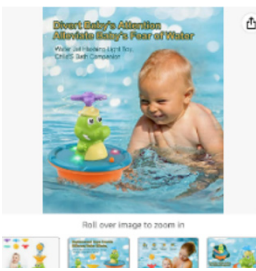
APPENDIX 1: LIST OF 40 TOYS BY ONLINE MARKETPLACE

ALIEXPRESS RESULTS

No	Toy title as seen on AliExpress	Comments	Test results	Toy photo as seen on AliExpress	Classification
1	Fun toys Hilarious Speedy Remote Control Speed Poo Family Fun Drive and Spin Fun Toy HOT sale Perfect gift#guahao	Some battery information Button batteries in remote control and screw in place. No manufacturing or europe/UK address.	Test Ref: 277431 EN62115 - FAIL 7. marking & instructions - various 13. construction - screw separated at force		Unsafe
2	KBDFA 2022 New Flying Ball Airplane RC UFO RC Drone Helicopter Mini UFO Sensing Aircraft Electronic Model Quadcopt Boy Toy Gift	No address on packaging Instruction leaflet USB lead	Test Ref: 277686 EN62115 - FAIL 7. marking & instructions - various 9. heating & abnormal operation - temperature rise exceeds limit		Unsafe
3	34CM Creative Toy Luminous Pillow Soft Stuffed Plush Glowing Colorful Stars Cushion Led Light Toys Gift For Kids Children Girls	CE mark and EC rep address (partially covered on postage packaging.) No other information on toy or packaging. Zip to open to expose wires and battery compartment. Screw enclosure but no screw. (AA batteries)	Test Ref: 277429 Age Grading: 0months+ EN71-1 - FAIL 5.1 small parts generated (zip) 5.4 long cords (wires) 5.8 shape & size (battery box) 6 flexible plastics 7. Labeling to be modified		Unsafe
4	3 in 1 Montessori Pull String Baby Toys 1 2 3 Years Sensory Teething Toys For Babies Development Baby Games Toys 6 12 Months	Incorrect labelling	Test Ref: 42080505 Age Grading: 0months+ EN71-1 - FAIL 5.4 cords & chains excess length and potential to tangle		Unsafe
5	Montessori Toy Busy Board for Kid Learning Lock Early Educational Sensory Shape Color Matching Baby Game Wooden Toy For Children	No information on packaging or toy. Accessible small parts	Test Ref: 277310 Age Grading: 3yrs + EN71-1 - PASS 7. labeling not present Formaldehyde appendix C - PASS		Illegal

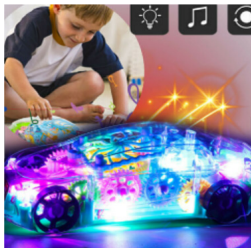
No	Toy title as seen on AliExpress	Comments	Test results	Toy photo as seen on AliExpress	Classification
6	A Bag Of Rabbit&Dog&Hamster& Cat&Avocado Pudding Doll Plush Japanese Animation Sumikko Gurashi Toy Soft Pillow Children Girl Gift	No information on packaging or toy.	Test Ref: 277426 Age grading: 0 months+ EN71-1 - FAIL 5.1 small parts generated (zip puller) 7. Labeling to be modified Phthalates - FAIL DEHP 152838 mg/kg (max allowed 1000 mg/kg)		Unsafe
7	Flashlight Projector for Kids Baby Sleeping Story Book Torch Lamp Toy Early Education Toy Holiday Gift Light Up Toy Toys	No information on packaging or toy. No small parts within the toy. Button cell batteries but secure.	Test Ref: 277430 EN62115 - FAIL 13. construction - screw separated at force EN71-1 - PASS Age grading: 2 years + 7. Labeling to be modified		Unsafe
8	luminous toys children gifts flash handbags birthday gifts party decoration halloween decor party Glow Props Children's Day	No information on packaging or toy Accessible button cell batteries Long cords	Test Ref: 277308 EN62115 - FAIL 13. construction - accessible button cell batteries EN71-1 - FAIL Age grading: 3 years + 4.8 sharp points (on end of light emitting diodes) 7. Labeling to be modified		Unsafe
9	Mini Baby Crawl Toys Cute Toddler Puzzle Electric Music Crawl Girls Boys Guide Crawl Learn Early Education Baby Toys 0-12Months	Incorrect labelling Battery operated (2xAAA). Screw close enclosure - screw in place.	Test Ref: 277307 EN62115 - FAIL 7. Marking & Instructions - various EN71-1 - PASS Age grading: 3 years + 7. Labeling to be modified		Unsafe
10	Fashion Colorful Sleeping Baby Doll Hanging Piece Hair Ball Pendant Cute Fluffy Pompom Chain Cotton Wool Holder Bag Ball Toy	No information on packaging or toy	Test Ref: 277309 Age Grading: <3yrs EN71-1 - FAIL 5.1 small parts generated - part of the metal ring		Unsafe

AMAZON RESULTS

No	Toy title as seen on Amazon	Comments	Test results	Toy photo as seen on Amazon	Classification
1	Fairy Craft Lanterns Toys for Kids- DIY Light Up Terrarium Craft Kit with Unicorn & Mermaid Toys for Children Age 5 6 7 8 9 10 11 12- Remote Control Night Light Craft Gifts for Girls, Boys and Adults. Brand: WOLGYING	0-3 sign and CE mark too small Button cell batteries can be accessed.	Test Ref: 277315 Age Grade: 3yrs + EN71-1 - FAIL 4.8 sharp points (wires) 6. flexible plastics/pkg 7. Labeling to be modified Test Ref: 276928 EN62115 - FAIL 7. marking and instructions - various 13. Construction - small batteries and small parts (screw) generated		Unsafe
2	HuiJuKeJi Baby Bath Toys, Crocodile Light Up Bath Toy with 5 Modes Water Spray Automatic Induction Sprinkler Bathly Bath Toys for 0-6 Months 1 2 3 Year Olds Gift for Baby Kids Toddlers Toys	No UKCA mark Incorrect 0-3 sign and warning/choking hazard.	Test Ref: 276925 EN62115 - FAIL 7. marking & Instructions - various		Unsafe
3	Yorgewd 2 Pack Baby Sensory Toy, Rainbow Wooden Ribbon Rings Toy Baby Rattles for 3-18 Months Babies Infant Toddler Boys Girls(Colorful)	No UKCA mark No UK address Long ribbons - 45cm	Test Ref: 276931 Age grade: 2months + EN71-1 - FAIL 4.11 Mouth actuated toys 5.1 Small parts generated 5.4 Long cords 5.8 Shape and size of toy 5.10 Small balls 7. Labeling to be modified		Unsafe
4	Thedttoy Reversible Plush Happy Kitty corn Sad Kitten Soft Toy Double-Sided Flip Doll Show Your Mood Without Saying A Word Cute Small Stuffed Animal Xmas Birthday Gifts for Kids Teens Girls Boys	No UK address Plush toy - No care label.	Test Ref: 276929 Age grade: 0 months + EN71-1 - PASS 7. Labeling to be modified	 PERFECT KIDS GIFT	Illegal
5	HYSZX Pop Purse Bubble Toys, Pop Bag Fidget Toy Small Shoulder Bag Halloween Treats Bags Suffer Party Favors, Cute Uni-Corn Popper Crossbody Bag Stress Relief Sensory Toy Best Gifts for Girls	No UKCA mark CE mark too small Label on packaging states Age 2+ Long cords	Test Ref: 42080502 Age grade: 2yrs + EN71-1 - FAIL 5.1 generated small parts (clips, flowers and horn) 6. flexible plastics / packaging		Unsafe

No	Toy title as seen on Amazon	Comments	Test results	Toy photo as seen on Amazon	Classification
6	Abree 30 pcs Magnetic Fishing Toy, Floating Bath Game Toy with Net Game Set Bath for Kids Fishing Learning Education Reflex Toys for Toddlers Kids Children	No information on toy or packaging except for UKCA mark. There are no small parts within the toy.	Test Ref: 42080510 Age grade: 3yrs+ EN71-1 - FAIL 6. flexible plastics / packaging Phthalates - FAIL		Unsafe
7	Jeaxus Magnetic Special Needs Developmental Toys, Decompression Fidget Toy for Fidget, Boredom, Anxiety and Autism	No address	Test Ref: 42080507 Age grade: 3yrs+ EN71-1 - FAIL 4.23 magnetic flux (211.3 kg2mm2)		Unsafe
8	Highttoy Baby Rattle, Light Up Musical Rattle Teether Toy for Baby 3 6 9 12 Months Baby Sensory Sound Toys Dynamic Musical Teething Rattle Toys for Babies Toddlers Hand Grip Blue	No UK address Rest appears to be compliant. Some battery information missing.	Test Ref: 42080509 Age grade: 0 yrs + EN71-1 - PASS		Illegal
9	Kimzom Pretend Makeup Sets for Girl Cosmetic kits Dress up Set for Little Girl	UK representative address but no UKCA mark CE Mark but no EU address. Button cell batteries - some information on packaging	Test Ref: 277703 Age grade: 3yrs + EN71-1 - FAIL 4.14 Sunglasses broke - small parts may enter eye 7. Labeling to be modified		Unsafe
10	FUFUFA 6x Light-UP Pop Tubes LED Sensory Fidget Toys Easter Gifts Basket Stuffers Party Favors for Kids Glow Sticks in The Dark Pull Stretch Tubes for Kids Birthday Party Stuffers	Incorrect warning sign. Button cell batteries.	Test Ref: 277688 Age Grade: 3yrs + EN71-1 - FAIL 4.8 sharp points (sharp point on diodes) 7. Labeling to be modified Test Ref: 277688 EN62115 - PASS		Unsafe

EBAY RESULTS

No	Toy title as seen on eBay	Comments	Test results	Toy photo as seen on eBay	Classification
1	Toys for 1 Year Old Boys Girls for Babies 6-12	No UKCA mark but UK address No EU address but CE mark Small parts warning - not suitable for baby under 18months.	Test Ref: 277314 Age Grading: 18months+ EN71-1 - PASS 7. Labeling to be modified		Illegal
2	Soft Baby Cloth Book Early Educational Newborn Crib Toys for 0-36 Months Infants	No address No age recommendation Care instructions in place	Test Ref: 42080504 Age Grading: 0months+ EN71-1 - FAIL 5.1 small parts generated (velcro hook)		Unsafe
3	NEW LED Light Music Cool Car 2 3 4 5 6 7 8 Year Old Age for Boys Kids Toys Gift	UKCA mark too small Battery compartment has screw hole but no screw came with toy: Batteries (3xAA) could be accessible.	Test Ref: 277010 EN62115 - FAIL 7. marking & Instructions 13. Construction - accessible batteries		Unsafe
4	Montessori Toys for 1 2 3 Year Old Toddlers Educational Number Letter 75pcs	Packaging compliant 6 months plus but cords/ drawstring length 52cm and small parts as part of toy including balls	Test Ref: 277006 Age Grading: 6months+ EN71-1 - FAIL 5.1 small parts as received 5.10 small balls 5.4 cord lengths potential to tangle 5.4 cord lengths 5.4 Fixed loops		Unsafe
5	Montessori Busy Board Button Switch Toys for Toddlers 1 2 3 Year Old Kids	No information seen on packaging or toy. Electrical - no information	Test Ref: 277311 EN62115 - FAIL 9. Heating & abnormal operation - temperature rise of battery surface 13. Construction - screw became separated at force		Unsafe

No	Toy title as seen on eBay	Comments	Test results	Toy photo as seen on eBay	Classification
6	Baby Bath Toys, Bathtub Toys for 1 2 3 4 + Year Olds Boys Girls Gift Set,	No CE / UKCA mark No UK address Incorrect warning sign	Test Ref: 277312 Age Grading: 12months+ EN71-1 - FAIL 5.12 hemispheric shaped toys 7. Labeling to be modified		Unsafe
7	Baby Kids Musical Educational Piano Developmental Music Gift Toys New Best	Chinese address only No age recommendation No screws in battery compartment (AA batteries)	Test Ref: 277690 EN62115 - FAIL 7. marking and instructions - various 13. Construction - accessible batteries		Unsafe
8	18 Pink/Purple Rag Doll Girls Baby Christening Xmas Birthday Christmas Toy Gift	Plush doll but 0-3 sign and warning/choking sign. No care label.	Test Ref: 277313 Age Grading: 0months+ EN71-1 - FAIL 5.2 seams separated 7. Labeling to be modified		Unsafe
9	1 Set Funny Educational Baby Toys For 2 Years. Old Toddler Kids Boys Girls- BEST	No information on packaging.	Test Ref: 277691 Age Grading: 24months+ EN71-1 - FAIL 5.1 small parts generated (pen adhesive) 5.2 seams separated 7. Missing Labeling		Unsafe
10	Robot Toys For Boys Kids Toddler Robot 2 3 4 5 6 7 8 Year Old Age Boys Cool Toy	18m + on packaging Incorrect labelling Takes AA batteries. No screw on battery compartment	Test Ref: 277689 EN62115 - FAIL 7. marking and instructions - various 13. Construction - accessible batteries		Unsafe

WISH RESULTS

No	Toy title as seen on Wish	Comments	Test results	Toy photo as seen on Wish	Classification
1	Baby Bath Toys DIY Slide Race Run Assembling Track Bathroom Bathtub Shower Kids Play Water Games Toy Set for Children	Incorrect labelling	Test Ref: 277694 Age grade: 18months+ EN71-1 - FAIL 5.13 suction cups 7. Labeling to be modified		Unsafe
2	Bath Books Baby Education Toy Intelligence Development EVA Floating Cognize Book for New Arrival	No information on packaging or toy. Soft plastic	Test Ref: 42080503 Age grade: 0+ EN71-1 - FAIL 6. Flexible plastics/ packaging Phthalates - PASS		Unsafe
3	Remote Control Shark Toys Air Swimming Fish RC Animal Toy Infrared RC Fly Air Balloons Clown Fish Toy Interesting Gifts Party Decoration	EC representative address on outer packaging No UKCA mark / UK address	Test Ref: 277702 EN62115 - FAIL 6. Marking & Instructions - various 13. Construction - screw/fastener to cover comes off		Unsafe
4	Princess Doll in Fairy Tale Figures Toy Playset Girl Birthday Gift Fuchsia	No address No UKCA mark small parts within the toy but warnings in place.	Test Ref: 277701 Age grade: 3yrs+ EN71-1 - FAIL 6. Flexible plastics/ packaging 7. Labeling to be modified Phthalates - PASS		Unsafe
5	Bubble Gun Rocket 32/69 Holes Soap Bubbles Machine Gun Shape Automatic Blower With Light Toys For Kids Pomperos Children's Day Gift	No information on packaging or toy. USB cable, small screw driver. Battery compartment AA batteries.	Test Ref: 277696 Age grade: 3yrs+ EN71-1 - FAIL 4.10 driving mechanisms (access to propeller) 7. Labeling to be modified EN62115 - FAIL 13. Construction - screw/fastener to cover comes off		Unsafe
6	1PC Animal Farm Music Piano Baby Developmental Music Toys Educational Toy Kids Gift	No information on packaging. Made in China on toy. AA batteries. No screw on battery enclosure.	Test Ref: 277692 Age grade: 12 months + EN71-1 - FAIL 5.1 small parts generated (buttons, springs, laminated adhesives) 7. Labeling to be modified EN62115 - FAIL 13. Construction - accessible batteries		Unsafe

No	Toy title as seen on Wish	Comments	Test results	Toy photo as seen on Wish	Classification
7	1pc Funny Cartoon Dog Crocodile Shark Toys Mouth Dentist Bite Finger Novelty Game Toy For Kids Children	No address. No UKCA mark	Test Ref: 277695 Age grade: 3 yrs + EN71-1 - FAIL 4.8 points and wires (sharp points on ends of upper jaw) 7. Labeling to be modified EN62115 - FAIL 7. marking and instructions - various		Unsafe
8	Unisex Boy and Girl New 5PC Drum Musical Instruments Band Kit Kids Toy Gift Set	No address 18months + but 0-3 mark and choking sign.	Test Ref: 277700 Age grade: 2yrs+ EN71-1 - FAIL 4.11 mouth actuated toys 4.20 acoustics: Wind toys 5.1 small parts & small parts generated 5.10 small balls generated 5.14 straps worn around neck 7 Labeling to be modified		Unsafe
9	Busy Board, School Bus Style Activity Board(12 Basic Skill), for Fine Motor and Learn to Dress, Early Educational for Preschool Kids Toddler, Sensory Toy for Kindergarten Classroom Airplane Car Travel	No info on packaging or toy	Test Ref: 277697 Age grade: 2yrs+ EN71-1 - FAIL 5.1 small parts generated (various) 5.14 straps worn around neck 6 Flexible plastics 7 Labeling to be modified		Unsafe
10	Inflator Car Toy Inertial Balloon Powered Pump Cars For Kids Children Boys Girls Science Intelligence Educational Toys Gift	Incorrect labelling. Small parts: small balloons.	Test Ref: 277693 Age grade: <36months EN71-1 - FAIL 4.12 balloon warnings 5.1 small parts (balloons) 7. Labeling to be modified Nitrosamines could not be tested due to insufficient samples.		Unsafe

APPENDIX 2: THE TOP REASONS FOR NON-CONFORMANCE

The top non-conformances in 2022 were:

Standard	Fault	Number of times fault seen	Potential Hazard
EN71-1	Small parts generated	11	Choking
EN62215	Marking and instructions	9	Missing safety information
EN71-1	Plastic sheeting thickness	7	Suffocation
EN62215	Screw detached	5	Choking
EN71-1	Sharp points	5	Injury
EN71-1	Long cords	4	Strangulation
EN62215	Accessible batteries	4	Choking / burns
EN71-1	Small balls	3	Choking
EN71-1	Small parts received	2	Choking
EN71-1	Straps worn around the neck	2	Strangulation
EN71-1	Seams separated	2	Choking
EN62215	Heating and abnormal temperature	2	Burns
EN62215	Accessible button cell batteries	2	Choking / burns
REACH Phthalates	Exceeds DEHP limit	2	Chemical
EN71-1	Hemispheric shaped toys	1	Choking / suffocation
EN71-1	Suction cups detached	1	Choking / suffocation
EN71-1	Access to mechanism (propellor)	1	Injury
EN71-1	Acoustics exceed limit	1	Injury
EN71-1	Balloon warnings	1	Choking
EN71-1	Magnetic flux exceeds limit	1	Choking
REACH Phthalates	Exceeds DIBP limit	1	Chemical

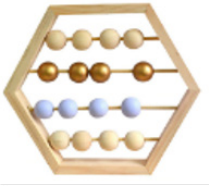
APPENDIX 3: STILL ON SALE

Still on sales check for 101 toys notified to the UK Unsafe Product Report from the BTHA 2021 report.

Notification information in the table is taken from the Unsafe Product Report. Seemingly identical lines found for the following products:

Published	Report number	Alert number	Description of toy	Risk level	Risk type	Platform	Image
03/09/2021	35	2108-0173	Bath swim mermaid	High	Choking	AliExpress	
10/09/2021	36	2108-0343	Wooden pendant teether	High	Choking	AliExpress	
10/09/2021	36	2108-0321	Elephant wooden crochet teether	High	Choking	AliExpress	
10/09/2021	36	2108-0450	Balloon powered DIY car	High	Choking	AliExpress	
10/09/2021	36	2108-0396	Magnet ball coloured cube	Medium	Choking and injuries	AliExpress	
17/09/2021	37	2108-0115	Cheesy Puffs Soft plush toy	Serious	Chemical	AliExpress	

Published	Report number	Alert number	Description of toy	Risk level	Risk type	Platform	Image
17/09/2021	37	2108-0189	Princess icecream cone makeup set	Medium	Suffocation	AliExpress	
17/09/2021	37	2108-0234	Supermarket cash register toy	Medium	Suffocation	AliExpress	
17/09/2021	37	2108-0305	Inflatable fishing magnetic toy	High	Choking and injuries	AliExpress	
17/09/2021	37	2108-0075	"RC Train Item no: 33004937308"	Medium	Burns	AliExpress	
17/09/2021	37	2108-0079	Icecream Lego truck	Medium	Injuries	AliExpress	
17/09/2021	37	2108-0440	"Pretend cake food Item no: 4000429697058"	Medium	Injuries and Asphyxiation	AliExpress	
17/09/2021	37	2108-0096	Draw with light board	Serious	Chemical and Choking	AliExpress	

Published	Report number	Alert number	Description of toy	Risk level	Risk type	Platform	Image
17/09/2021	37	2108-0096	Pink Excavator toy	Medium	Burns	AliExpress	
17/09/2021	37	2108-0300	"Magnastix Item no: 1005001406906790"	High	Choking and injuries	AliExpress	
17/09/2021	37	2108-0432	Magnetic building shapes / blocks	Medium	Choking and injuries	AliExpress	
17/09/2021	37	2108-0069	"Wooden train set Ali No: 1005001808714679"	High risk	Choking and injuries	AliExpress	
08/10/2021	40	2108-0247	"Magnetic shapes in clear box Model No.XYC40021-XYC40180"	Medium	Choking and injuries	AliExpress	
08/10/2021	40	2108-0237	"Minnie Mouse Kitchen Set Model no. 913A"	High	Choking and Suffocation	AliExpress	
08/10/2021	40	2108-0243	"Wooden Abacus Toy Item No: 4001152549633"	Serious	Choking	AliExpress	
08/10/2021	40	2108-0217	Mermaid princess doll	Not given	Chemical	AliExpress	

Published	Report number	Alert Number	Description of Toy	Risk Level	Risk Type	Platform / Project	Image
24/09/2021	38	2108-0158	"Bath Basketball Hoop ASIN: B08CL1F556"	Medium	Choking and Strangulation	Amazon	
17/09/2021	37	2108-0138	"Wind up bath turtles ASIN: B08DJ5LL66"	Medium	Choking and Suffocation	Amazon	
17/09/2021	37	2108-0117	"Build a Garden ASIN: B082YQQBPX"	Medium	Injuries	Amazon	
01/10/2021	39	2109-0055	"Watermelon Threading Toy ASIN B07MYFSGZ"	High	Strangulation	Amazon	
01/10/2021	39	2109-0001	"7pc Bath fishing game ASIN B07TWD6VNG"	Medium	Choking and Suffocation	Amazon	
15/10/2021	41	2109-0018	"Magnetic pen and magnet set ASIN: B081JTSV9H"	High	Choking and injuries	Amazon	
15/10/2021	41	2109-0049	"Airbus airplane ASIN B0756MT4FY"	Medium	Burns	Amazon	

Published	Report number	Alert Number	Description of Toy	Risk Level	Risk Type	Platform / Project	Image
15/10/2021	41	2109-0027	"Magnetic pizza pens ASIN: B01F36DST0"	Serious	Choking, Injuries & Asphyxiation	Amazon	
15/10/2021	41	2109-0215	"Light up gloves ASIN: B07X3VVDW"	High	Internal injuries & choking	Amazon	
22/10/2021	42	2109-0408	"Hollow teething tubes ASIN: B08T5L9ZXH"	High	Choking	Amazon	
22/10/2021	42	2109-0221	"Wooden Vegetable patch ASIN: B08D6K8M3Y"	High	Choking and strangulation	Amazon	
29/10/2021	43	2109-0060	"Water doodle mat ASIN: B074N3Z7H8 ASIN: B074MTP6HD"	High	Choking	Amazon	
29/10/2021	43	2109-0184	"Lictin musical piano xylophone ASIN: B08NDLYT3T"	Serious	Strangulation & Asphyxiation	Amazon	
29/10/2021	43	2109-0017	"Monkey maze ASIN: B084ZDNRHS"	High	Choking, Injuries & Asphyxiation	Amazon	

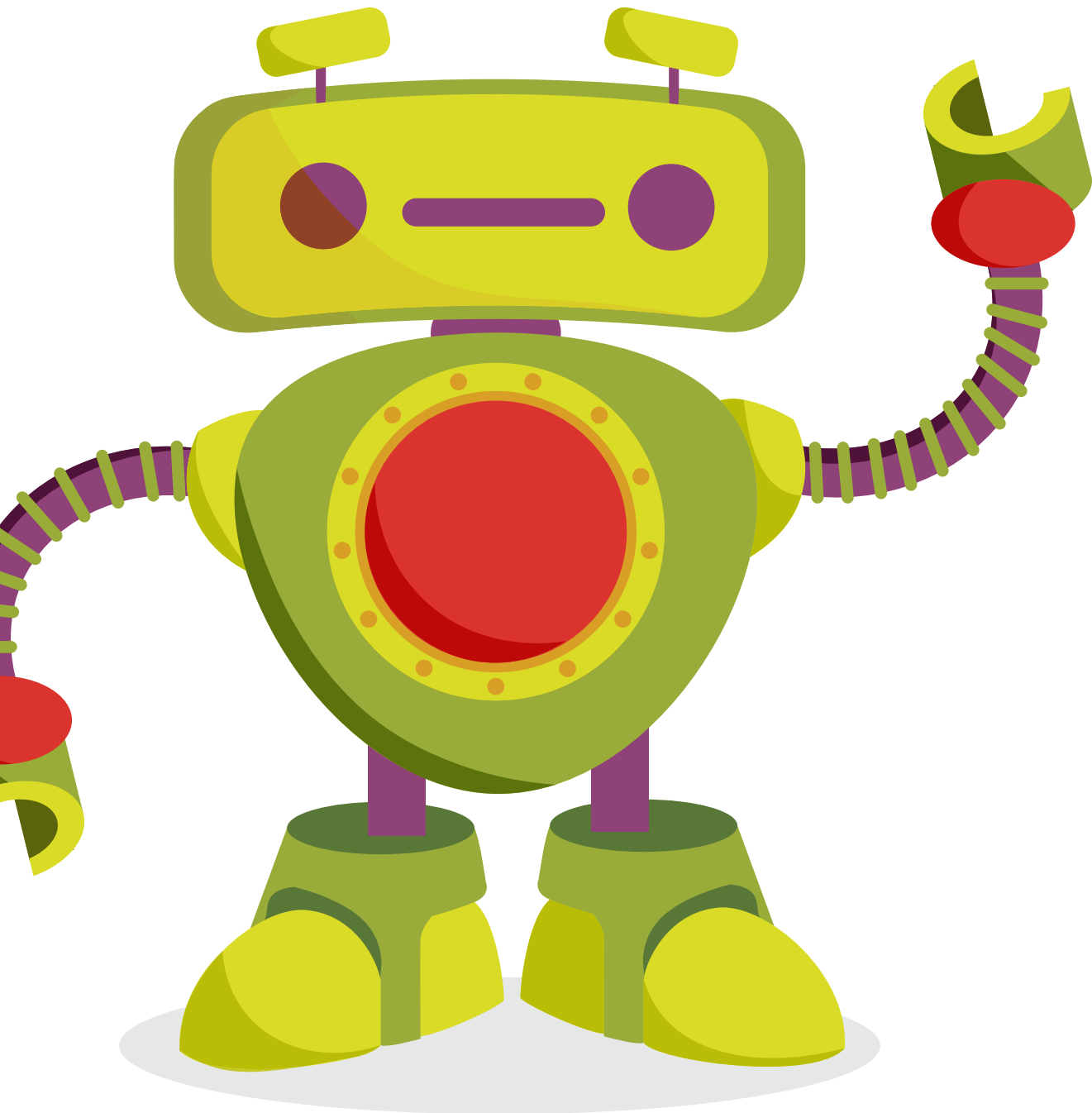
Published	Report number	Alert Number	Description of Toy	Risk Level	Risk Type	Platform / Project	Image
29/10/2021	43	2110-0008	"glow LED pink star wand ASIN: B07KPCR899"	Serious	Choking & internal injuries	Amazon	
12/11/2021	45	2109-0047	"Horseshoe magnetic set ASIN: B081SZMRDY"	High	Injury	Amazon	
21/01/2022	54	2109-0188	"Elephant bath shower toy ASIN: B089SDR6DX"	Serious	Choking	Amazon	
25/03/2022	63	2108-0212	"Libra Frog Intelligent Game ASIN: B07WRBV73D"	Serious	Choking & Asphyxiation	Amazon	
25/03/2022	63	2108-0340	"Captain America dancing toy ASIN: B08S43HJRG"	Medium	Burns	Amazon	
25/03/2022	63	2108-0193	"children music iphone ASIN: B08LVKCB4K"	Medium	Burns	Amazon	
25/03/2022	63	2108-0353	"Fidget wacky Tracks toy ASIN: B08QM8ZZBR"	Medium	Choking	Amazon	

Published	Report number	Alert Number	Description of Toy	Risk Level	Risk Type	Platform / Project	Image
25/03/2022	63	2108-0336	"Baztoy flying ball ASIN: B089M7MP23"	High	Chemical, choking and injuries	Amazon	
17/09/2021	37	2108-0263	"Piano toy item no.233794767833"	Serious	Choking and burns	eBay	
17/09/2021	37	2108-0318	"Wooden bead baby gym stand item no.174545773906"	Serious	Choking and strangulation	eBay	
01/10/2021	39	2109-0071	"Baby Gym Play Mat with Arch & Piano item no.373426908504"	High	Choking	eBay	
01/10/2021	39	2109-0187	"Baby Shark plush item no.363310819734"	Serious	Chemical, choking & burns	eBay	
08/10/2021	40	2109-0168	"Mini dolls item no.353163363353"	Not given	Chemical	eBay	
08/10/2021	40	2109-0092	"Sprinkler ball bath water toy item no.333841535619"	Medium	Choking and burns	eBay	

Published	Report number	Alert Number	Description of Toy	Risk Level	Risk Type	Platform / Project	Image
15/10/2021	41	2109-0154	"Dancing Bee item no.164480514115"	Medium	Electric shock & burns	eBay	
15/10/2021	41	2109-0191	"Sensory LED toy item no.183969870498"	Serious	Choking	eBay	
15/10/2021	41	2109-0183	"Wooden Camera item no.392879473760"	High	Choking	eBay	
15/10/2021	41	2109-0178	"Grey TV music remote control item no.353383111518"	High	Choking	eBay	
15/10/2021	41	2109-0210	"LED white bear item no.164688207030"	High	Choking	eBay	
29/10/2021	43	2109-0401	"Drum musical set ebay item no. 133600400802"	Serious	Choking & Strangulation	eBay	
29/10/2021	43	2109-0185	"Wooden ribbon teether ebay item no. 373122533054"	High	Choking & asphyxiation	eBay	

Published	Report number	Alert Number	Description of Toy	Risk Level	Risk Type	Platform / Project	Image
04/11/2021	44	2109-0194	"Educational magnetic building blocks 68pcs item no.124500486843"	Medium	injuries	eBay	
10/12/2021	49		Baby doll in bath tub	Serious	Chemical and Choking	eBay	
21/01/2022	54	2108-0414	"Mini magical magnetic shapes other prod id: 363184751133"	Serious	Injuries and choking	eBay	
17/09/2021	37	2108-0252	Inflatable circle neck swim float	Medium	Choking	Wish	
17/09/2021	37	2108-0223	LED Soft Blue Plush Dog	Serious	Choking	Wish	
17/09/2021	37	2108-0228	Birthday cake with candles	Serious	Injuries	Wish	
17/09/2021	37	2108-0232	2pc plastic princess dolls	Serious	Chemical	Wish	

Published	Report number	Alert Number	Description of Toy	Risk Level	Risk Type	Platform / Project	Image
17/09/2021	37	2108-0245	Bath LED fish	Serious	Chemical and Choking	Wish	
17/09/2021	37	2108-0256	Wooden Russian Dog dolls	Serious	Choking and Suffocation	Wish	



APPENDIX 4: STILL ON SALE – TEST RESULTS

Results for the ‘seemingly identical’ toys sent for testing.

Amazon

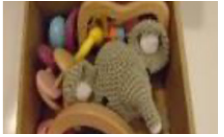
Toy title as seen on the marketplace	Toy photo	Seemingly identical toy photo as seen on marketplace	Previous test results	Comments	New test results	Reason for fail
SULOLI Baby Bath Toys, Bath Basketball Hoop for Baby, Toddlers, Kids, Boys and Girls with 3 Balls & Strong Suction Cup, Fun Toddler Bath Toys Set, Gift for Boys or Girls			12/2/21 Test Ref: 256403 Age Grade: 24months + EN71-1 - FAIL 5.1 Small parts generated 5.4 fixed loops 7. Missing labeling	Seemingly identical No information on toy or packaging Plastic bags	10/8/22 Test Ref: 276927 Age Grade: 24months + EN71-1 - FAIL 5.1 Small parts generated 6. Flexible plastics/ packaging 7. Labeling to be modified	Same
Hollow Teether Tubes, Teething Sensory Chew Molar Toys for Babies 0-6 Months 6-12 Months - BPA Free/Freezer and Refrigerator Safe - Different Soft Textures for Infant and Toddlers. Brand: Achort			9/3/21 Test Ref: 257176 Age grade: 0 months + EN71-1 - FAIL 5.8 Shape and size of certain toys 7. Missing labeling	UKCA mark too small	11/8/22 Test Ref: 276930 Age grade: 3months + EN71-1 - FAIL 5.8 Shape and size of certain toys 7. Labeling to be modified	Same

eBay

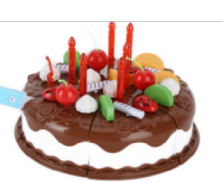
Toy title as seen on the marketplace	Toy photo	Seemingly identical toy photo as seen on marketplace	Previous test results	Comments	New test results	Reason for fail
Wooden Baby Toys Fashion Camera Wood Pendants Montessori Toys Diy Present APUKBBA			16/2/21 Test Ref: 256421 Age Grade: 24months + EN71-1 - FAIL 5.1 small parts generated (camera button) 5.14 no breakaway on strap 7. Missing labeling	No information seen on packaging or toy. N.B 12/8/22 Product may have been recalled or pose a safety hazard. Potential Hazards are detailed in email - recommend stop using product/ contact seller/can request refund.	30/8/22 Test Ref: 42080508 Age Grade: 0months+ EN71-1 - FAIL 5.1 small parts generated (shutter button) 5.14 no breakaway on strap	Same

Toy title as seen on the marketplace	Toy photo	Seemingly identical toy photo as seen on marketplace	Previous test results	Comments	New test results	Reason for fail
2 X Bath Toys Squirt Spray Water Float Toys Sprinkler Pool Toys/Baby Kids 2 PACK			31/3/21 Test Ref: 257706 EN62115 - FAIL 9 temperature rises 13 Mechanical strength of enclosures 14.7 accessible batteries 14.11 fixing of non- detachable parts	Packaging appears to be Compliant N.B 27/9/22 Link to recall 2109-0092. Recommend stop using product/ contact seller/may get refund.	1/9/22 Test Ref: 277433 EN62115 - FAIL 7. Marking and Instructions - no retain statement on the packaging	Different

AliExpress

Toy title as seen on the marketplace	Toy photo	Seemingly identical toy photo as seen on marketplace	Previous test results	Comments	New test results	Reason for fail
Children Boy girl fishing toy set suit magnetic play water baby toys fish square hot gift for kids Free Shipping GYH			29/3/21 Test Ref: 257724 Age Grade: 3yrs + EN71-1 - FAIL 4.23 Generated small magnets (flux index 148.67kg2mm2) 6. Flexible plastics	No UKCA mark/ UK address	29/8/22 Test Ref: 277687 Age grade: 3yrs + EN71-1 - FAIL 4.23 Generated small magnets (flux index 73.18kg2mm2) Phthalates - PASS	Same
Let's Make Safe Wooden Toys Baby Montessori Toddler Toy Grip DIY Crochet Rattle Soother Bracelet Teether Toy Set Baby Product			9/2/21 Test Ref: 256207 Age Grade: 6months + EN71-1 - FAIL 5.1 small parts generated 5.8 shape & size 5.10 small balls 7. Missing labeling	No name/address CE mark too small No UKCA mark (N.B Toy bought from same store as recalled toy purchase - Lets make handmade Store.)	16/8/22 Test Ref: 277427 Age Grade: 0months+ EN71-1 - FAIL 5.1 small parts generated 5.10 small balls 5.8 shape & size 7. Labeling to be modified	Same

Wish

Toy title as seen on the marketplace	Toy photo	Seemingly identical toy photo as seen on marketplace	Previous test results	Comments	New test results	Reason for fail
Decorations Valentine'S Day Present Russian Doll Hand Painted Children Toys			21/4/21 Test Ref: 258801 Age Grade: 12months + EN71-1 - FAIL 5.1 small parts 5.12 Hemispheric shaped toys 7. Missing labeling	No information on packaging or toy. Small parts (smallest dog)	11/8/22 Test Ref: 277008 Age Grade: 3yrs + EN71-1 - FAIL 6. Flexible plastics/ packaging 7. Labeling to be modified including absent specific warnings and hazards	Different
Play Food Birthday Cake Set DIY Pretend Play Birthday Cake Toy Set for Kids Over 3 Years Old(Chocolate Color) Blo			1/4/21 Test Ref: 257993 Age grade: 3yrs + EN71-1 - FAIL 4.9 protruding parts / puncture hazard 7. Missing labeling	No information on packaging or toy. Small parts (decorations)	23/8/22 Test Ref: 277698 Age grade: 2yrs + EN71-1 - FAIL 4.9 puncture hazard 5.1 small parts as part of toy and small parts generated 5.10 small balls (cherries) 7. Labeling to be modified	Same



British Toy & Hobby Association
BTHA House
142-144 Long Lane
London SE1 4BS

www.btha.co.uk
020 7701 7271
queries@btha.co.uk