

The online toy safety gap - one year on

Has anything changed

Introduction

Back in 2024 we examined the safety of toys on various online marketplaces. We found that **80% were unsafe**.

This year, we repeated the study, focusing only on toys sold by **sellers based outside the EU.** We also rechecked several products that had been found to be unsafe in 2024.

We purchased a range of toys that appeared on the **first pages of search results** on seven online platforms delivering to Belgium and France. In addition, we bought toys that looked **identical to those flagged for safety issues last year**,

as well as toys that looked identical to a toy **listed on the EU Safety Gate**.

This study focused exclusively on **unbranded toys** and **toys from unknown brands** sold by **third-party sellers** through online marketplaces. The results therefore do not reflect the safety of all toys available on these platforms.

Each toy was sent to an expert third-party laboratory for testing and assessment against EU requirements. The results are presented below.

Results summary

- Of 70 toys tested, 96% of were not compliant with EU rules.
- 86% of the toys tested had serious safety issues.
- We took toys found on popular platforms AliExpress, Amazon Marketplace, CDiscount, Fruugo, Joom, Shein and Temu.
- The main issue we saw was the release of small parts which might cause young children to choke.
- Other issues include strong, small magnets and easy access to batteries; both of which can cause serious internal injuries.
- 10 toys, seemingly identical to those that were found to be unsafe during our review

- in 2024, were still for sale on the same platforms in some cases by the same seller some cases by the same seller and again failed safety testing.
- Several seemingly identical toys were sold on different platforms, by different sellers and with different manufacturers and 'EU responsible persons' listed.
- At least two of the toys looked identical to toys previously notified to the EU Safety Gate network that had been recalled.
- Some of the 'EU responsible persons' are named on several unsafe and previously recalled toys: it does not look like they check compliance of the toys.





Report details

1. Methodology.

We selected the popular online marketplaces AliExpress, Amazon Marketplace, CDiscount, Fruugo, Joom, Shein and Temu for review. To cover a wide range of products, we searched across ten categories of toys:

- Toys for children under 3
- Slime
- Toys with batteries
- Magnetic toys
- Baby rattles

- Plush toys
- Projectile toys
- Musical toys
- Dolls
- Disguise costumes



We shopped through the Belgian or EU websites of each marketplace and had most toys delivered to our offices in Brussels. For CDiscount, toys were purchases through its French website.

The toys were selected from the first pages of search results, and screenshots were taken to document and verify each search result. Only products from sellers based outside the EU were included. This shopping exercise focused solely on unbranded toys and toys from unknown brands sold by third-party sellers through online marketplaces. Branded toys were not included. The findings therefore do not represent the safety of all toys available on these platforms.

Before purchasing, we catalogued the details of each selected toy, including information on the seller, manufacturer and EU responsible person. This was supported by additional screenshots.

In addition to selecting different types of toys, we also searched for products that had been found to be unsafe in our 2024 project. These were chosen based on current availability on the online marketplaces where they had been purchased previously. We also purchased a toy from several platforms that appeared identical to a toy notified on the EU Safety Gate, the EU database of measures taken against unsafe and noncompliant goods.

Once the products arrived, we recorded details of the manufacturer and EU responsible person as labelled, and each toy was photographed and documented. Our experts then determined the appropriate safety tests to be carried out based on each toy's risk profile. All testing was conducted by an EU third-party laboratory accredited for toy safety testing and recognised as a Notified Body for toys.





2. Results.

Not all toy categories were available on every platform or from non-EU sellers, and some toys did not arrive or not arrive in time to be included in the project. In total,

70 toys were sent for testing.

Of the 70 toys, 96% did not comply with EU rules. 86% of the toys had serious safety issues.

Total number tested	Total passing all tests	Total failing at least one test	Toys with safety issues	% Non- compliant	% Safety issues
70	3	67	60	96%	86%



3. Data analysis.

The failures were classified as either non-compliant or as having a safety issue. A non-compliance means that the toy does not meet the requirements set out in EU rules, but this does not necessarily make it unsafe. Examples include missing contact details, incomplete labelling, or the absence of a CE marking.

Safety issues are problems identified during testing that directly affect safety and pose risks to children. Examples include small parts that could cause choking or easy access to button batteries that could be swallowed. When a product was found to have a safety issue, it was automatically considered non-compliant as well.

The rate of safety issues was found to be 86% of all toys bought. In other words, almost nine out of ten toys purchased from these marketplaces pose a risk to children.

The non-compliance rate across all samples was 96%. Almost none of the toys meet EU rules.

The most common reason for safety failures was that toys either contained small parts or released small parts during testing – a total of 26 toys. Small parts present a choking risk to young children. Under the relevant toy safety standards, toys intended for children under three years old must not contain or release small parts after testing. The toys in this study were either misadvertised as suitable for children under three, badly designed, or both.



The second most common reason for failure was access to batteries – found in 7 toys. Toy safety standards require that access to small batteries be prevented, as they can cause serious internal injuries if swallowed. Lithium coin cell batteries in particular have caused fatal injuries. Among the failed samples, three toys contained this type of battery.

Other reasons for failure include:

- Release of suction cups, posing a choking hazard. Suction cups can get stuck in children's throats.
- Excessive amount of Boron in slime.
 Boron is toxic to the reproductive system.
- Release of strong, small magnets. If swallowed, strong magnets can cause serious internal injury or even death.
- Electrical risks, such as short circuits and poor wiring which can lead to short circuits.
 Short circuits lead to batteries getting dangerously hot and may even cause fire.
- Some fabric toys were found to be flammable when subjected to relevant tests.
- Some toys had or released small balls.
 Small balls can close off the upper airway, causing choking.
- Projectile toys were found to release their protective tips or lack warnings about not aiming at the eyes or face.

- Plastic bags were found to be too thin.
 Thin plastic bags can easily form a seal on the mouth and nose, posing a suffocation risk to young children.
- Strangulation risks from cords that were too long.
- PVC materials contained banned phthalate plasticisers.
- Certain upright, rigid parts were found to pose a risk of bodily injury.
- Plush toys with weak seams, allowing access to stuffing materials.
- Some toys were found to have sharp edges which could cut the child.
- The shape of some rattles and other toys posed a risk of becoming wedged in the throat of young children, which can cause choking.





Commentary

1. Failure reasons

The failure reasons described above are well known to toy safety experts and industry professionals. Requirements addressing these hazards have been part of toy safety standards for many years and basic laboratory testing would have identified all the issues. Many of the products were found to fail design requirements, rather than because of variations between samples.



we tested in 2024

2. Reappearing samples

10 samples were selected because they were seemingly identical to toys that were tested and found unsafe in our 2024 mystery shopping exercise. They were selected from the same online platform and in some cases from the same seller. They all failed safety testing again.

3. RAPEX analysis

We also bought a small sample of toys seemingly identical to a toy already listed on safety gate.

This was a toy giraffe with suction cups that seemed to be advertised on numerous online marketplaces, each time by different sellers and with different EU responsible persons. We bought the toy from three of these platforms. All failed the safety testing. Although not part of this report, we noticed several similar toys but with designs of monkeys or robots.

4. Seller traceability

All listings included seller information – an obligation under the Digital Services Act and the General Product Safety Regulation. This is an improvement compared to 2024, when some platforms did not include this information.

All sellers were indicated to be outside EU jurisdiction, making it difficult to check whether the seller information was correct. We did not check the validity of the sellers as part of this project.

5. EU Representatives

Regulation 2019/1020 requires all products on the EU market to have an economic operator based in the EU that takes responsibility for some tasks related to compliance, a "responsible economic operator"/ "EU responsible person". Their tasks include verifying if a technical documentation and a Declaration fo Conformity (DoC) has been drawn up and to inform market surveillance authorities if they believe the product presents a risk. These requirements were strengthened by the General Product Safety Regulations 2023/988 (GPSR).





That had no 'EU responsible person' named in the online listing.



Without an EU responsible person name or address physically on the product or packaging.



EU responsible person' named online did not match that provided with the physical product

The GPSR specified that online marketplaces should not list a product that does not have the minimum product safety and traceability information. In case of non-EU manufacturers, the name, postal and electronic address of the 'EU responsible person' should be displayed or otherwise made easily accessible to consumers on the product listing.

However, there is no obligation for the online marketplace to verify whether the listed address for the 'EU responsible person' is accurate or whether there is indeed an agreement in place between this 'EU responsible person' and the manufacturer/seller.

Of the 70 toys tested, we found 5 toys that had no 'EU responsible person' named in the online listing.

We counted 20 toys without an EU responsible person name or address physically on the product or packaging.

We also found 11 cases where the 'EU responsible person' named online did not match that provided with the physical product.

We noticed that some 'EU responsible persons' were listed repeatedly: 8 of them were responsible for 38 of the tested toys, all of which had safety issues.

There were other inconsistencies we noticed, such as:

- Missing postal codes
- Postal codes did not match the address
- Addresses appearing to be for domestic properties
- Addresses for apparently the same business presented at different street addresses or different cities



Example cases

This section takes a deeper dive into some specific examples.

Toy gun

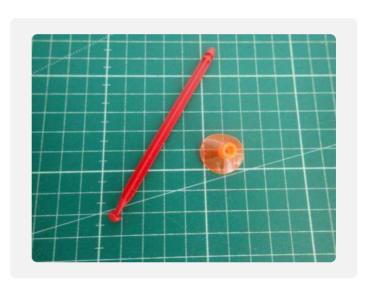
A picture of the toy:



Suction cups are a well-known choking hazard and have been restricted on projectile toys since 2011.

The testing released the suction cups which are a choking hazard:

This product is clearly non-compliant. The testing has proved this and industry experts confirm that the attachment of suction cups always needs extra attention as it is a well-known hazard.





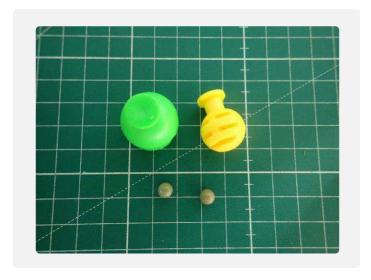
Rattles

Release of suction cups, posing a choking hazard. Suction cups can get stuck in children's throats.



This toy was found to have multiple safety issues:

- Parts had broken during shipping; there were small part choking risks
- Small parts broke off after testing, also a choking risk
- The products posed a risk of getting wedged in the airways, that could also cause choking

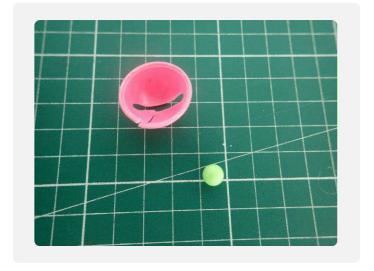


Small parts found as received

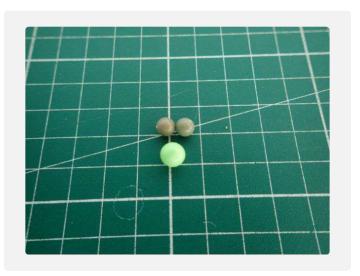


Small parts broken after testing





Small parts broken after testing



Small parts broken after testing



Parts could get wedged in the throat



Parts could get wedged in the throat

This toy was obviously too weak by design. It was too weak even to be posted without damage. Requirements restricting small parts in toys for young children have existed since the 1970s and the requirements restricting the shape of rattle handles have existed for at least 40 years.



The giraffes!

The giraffe toys came to our attention when one appeared on the <u>EU Safety Gate</u> alert system at the end of 2024:



The Safety Gate alert indicated that it was sold on an online platform. It was said to produce "small parts", described as the suction cups, which posed a choking risk and so did not comply with the safety standards. The outcome was listed as: "Removal of this product listing by the online marketplace".

Whilst purchasing for our 2025 exercise we found that this toy, or at least very similar toys, were still widely available. We decided to purchase examples from three online platforms. These pictures taken from the online marketplaces show the similarity to the product that appeared on Safety Gate.









As per our normal methodology, each sample was catalogued and sent out for testing. The tests were specifically selected to discover if the toys had the same defect as was found in the Safety Gate notification. The results were very clear:

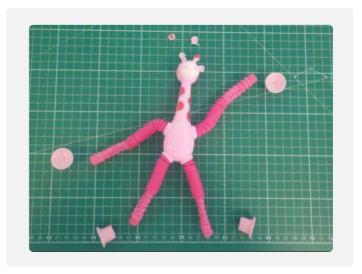




The suction cups detached and posed a risk of choking. The giraffes were also found to have ears which detach under testing, also a choking risk. In addition, 2 of the 3 were found to have plastics bags that were too thin. Thin plastic bags and sheets, easily conform to the shape of the face, closing off the airways and, potentially suffocating young children.

The products seem to be clearly targeted at children under the age of 3. One platform even shows the toy with a baby. Young children mouth and suck their toys. Small parts and suction cups in particular, can enter the airways and block them, which could be fatal.

All three toys seemed to have different sellers and manufacturers, and each had a different EU responsible person.





Certificates

In some cases, conformity or testing certificates were provided online. Although we did not investigate authenticity, these did not seem to be reliable for the products offered. When we found that the toy failed the testing, we investigated a few of the documents provided on the marketplace webpage for the toy.

One of our samples, some light up "trick thumbs", were found to fail the electrical safety testing (standard reference EN 62115) since the batteries were easily accessible.



The product on the website



Images of the failure

Three certificates were provided online, two of which were identical. The test reports appear to reference a different factory, a different product and are for a different set of safety tests (EN 71 instead of EN 62115). The toy pictured in the test report (shown right) was very different to the actual toy.





In another case, the toy webpage provided a declaration of conformity:



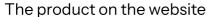
The declaration had several inconsistencies:

- The CE marking should not be used for such declaration of conformity
- The address was incomplete it had no street details
- 3. There were several item numbers it is usual to have a declaration cover several similar products, but this declaration referenced more than 50 item numbers
- 4. The EU responsible person is not mentioned
- The factory name does not match the name provided on the online marketplace webpage
- 6. The version of standard EN 71-3 mentioned is 2021 the post dates the date of the declaration, 5 November 2020.
- 7. The key standard (EN 62115) on electrical safety is missing from the references. This product was found not to comply with EN 62115 when we tested it

The only relevant part of the declaration is the reference to an "animal toy fish", which apparently reflects the product accurately. The toy was found to fail the tests of EN 62115 since the batteries were accessible after the testing.









Images of the failure

Confusing age recommendations

In the case of age recommendations, reputable manufacturers go to great lengths to ensure that the toy is suitable for, and safe for, the child at which the toy is targeted. We found examples where the warnings, descriptions and age recommendations were confusing or contradictory.

Rattles are a traditional toy that is typically suitable for babies from birth. One of the toys we sampled, appeared to be a toy rattle:

The product name was given as:

Wood Rattle, Baby Shaking Drum, 5.91x3.74x0.59 Inches, Tiger Shape Toy, Double Interactive Design, Easy Grip Handle, Sensory Play for Motor Skill and Auditory Development, Wooden





The terms "rattle", "baby", "easy grip", "sensory play" and "auditory development" all suggest that this product is a rattle for babies.

One of the descriptive lines states:

Perfect for Sensory Play: Ideal for early childhood sensory development, this interactive drum toy combines sound, sight, and movement to multiple senses, making it a fun and enriching tool for babies aged 6 months and up Explicitly stating it is for "babies aged 6 months and up".

In the warnings section of the webpage the following is provided:

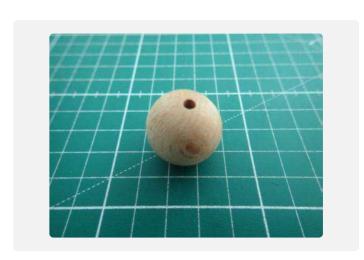
Warning: Not suitable for children under 3 years. For use under adult supervision

This warning is clearly contradictory to the above description. Furthermore, in the description, images show the product clearly being used by babies.



The child in the image is perhaps 6-12 months old.

When we tested the product against the requirements for children aged under three years, the balls detached, which is a serious choking risk to young children. From the lab test report:





Magnets

Small, strong magnets pose a serious risk to health if they are ingested. These magnets based on technologies such as neodymium-iron-boron and samarium-cobalt, are very strong and come in compact sizes. Their strength allows them to connect across human tissues, like an earlobe or even a whole hand. The issue is that if two or more magnets are ingested, they can clamp together in the gut.

Once clamped, the blood flow in the intestines is restricted and this can lead to parts of the bowel being seriously injured or even ruptured. This can be fatal as described by the <u>UKs child accident prevention trust (CAPT)</u>. Authorities in <u>Belgium</u> and <u>France</u> have also warned about the dangers.

The below image from the CAPT, an x-ray of a multiple magnet ingestion incident.



Toys have strict requirements for magnets. They were developed on a global basis meaning that similar requirements are found in most global toy safety standards. The requirements restrict the strength or size of the magnets, that is, if the magnets are strong, they need to be contained or so large they cannot be swallowed. These toy standards have become widely used to assess the safety of all kinds of magnetic products.



During the sampling process, we saw small magnets for sale. Some examples are shown below:





When tested, these magnets were found to significantly exceed the strength limits. Other toys were found to release small strong magnets after testing.

Consumer complaints

When making purchases we noticed that in some of the products, consumers were mentioning safety issues. After the testing was complete, we took a look at those consumer reviews again and noticed that some were complaining about aparently the same safety issues we were finding during testing.



Multi switch, LED Busy board, electrical toy

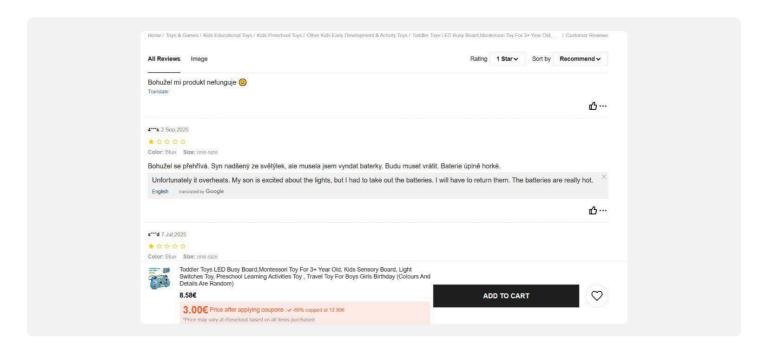


We tested this in 2024 and found the product was susceptible to short circuits posing a burning/fire risk:



In 2025, our test results showed that the insulation around the plug sockets was insufficient.

It seems though that consumers were warning about this issue in reviews:





Basketball ball track toy

We also tested this toy in 2024 and found that that balls were too small; they posed a risk of getting stuck in the throat and closing off the upper airway. We found the same thing when we tested the toy in 2025.





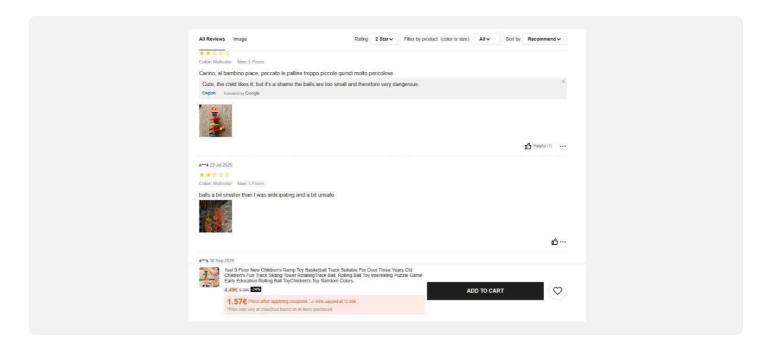
Failure picture from 2024

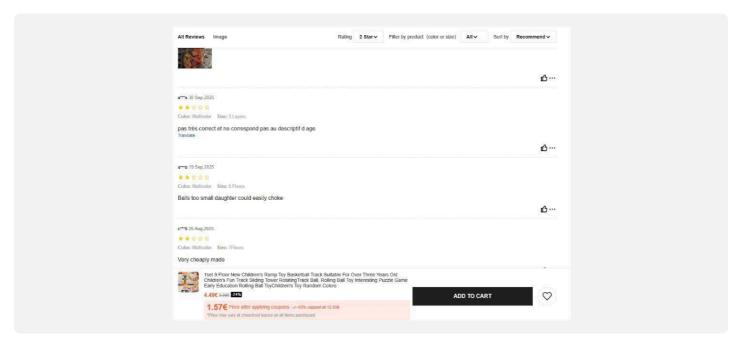


Failure picture from 2025



Consumers were also reporting concerns about the same issues:





Had the consumers concerns been taken seriously, the product might have been corrected sooner.