# TROUBLE IN TOYLAND

**36th Annual Toy Safety Report**

Counterfeit toys evade safety rules, endanger children

Arizona PIRG
Education Fund

# TROUBLE IN TOYLAND

**36th Annual Toy Safety Report**

Counterfeit toys evade safety rules, endanger children


WRITTEN BY:

**HANNAH RHODES**

U.S. PIRG EDUCATION FUND

NOVEMBER 2021

# ACKNOWLEDGMENTS

U.S. PIRG Education Fund thanks our donors for supporting our work on consumer protection and public health issues and for making this report possible.

The author wishes to thank the following for their insights and suggestions:

- Nancy Cowles, Executive Director, and Dev Gowda, Assistant Director, Kids In Danger, Chicago
- Ed Desmond, executive vice president, and Adrienne Appell, senior vice president, The Toy Association, New York
- Dr. Tricia Ashby-Scabis, director of audiology practices, American Speech-Language-Hearing Association

Thanks also to Elizabeth Ridlington and Tony Dutzik of Frontier Group; Ed Mierzwinski, senior director of the PIRG Federal Consumer Program; Consumer Watchdog Associates Isabel Brown and Jacob van Cleef, and Consumer Watchdog Teresa Murray for editorial support.

The author bears responsibility for any factual errors. Policy recommendations are those of U.S. PIRG Education Fund. The views expressed in this report are those of the author and do not necessarily reflect the views of our funders or those who provided review.

With public debate around important issues often dominated by special interests pursuing their own narrow agendas, U.S. PIRG Education Fund offers an independent voice that works on behalf of the public interest. U.S. PIRG Education Fund, a 501(c(3 organization, works to protect consumers and promote good government. We investigate problems, craft solutions, educate the public and offer meaningful opportunities for civic participation. For more information about U.S. PIRG Education Fund or for additional copies of this report, please visit www.uspirgedfund.org.

Design: Teresa Murray
Cover Image: Skarynka Alena via Shutterstock.com

# CONTENTS

# EXECUTIVE SUMMARY

THE HOLIDAYS are right around the corner again. As millions of Americans purchase toys before the year ends, they can take comfort in the improvement of toy safety in recent years thanks to hard work from consumer advocates, elected officials, the U.S. Consumer Product Safety Commission (CPSC) and the industry itself.

But, even with the advances in toy safety, dangerous toys still can and do end up on the market, largely because of counterfeits and recalled toys still available. So far in 2021, 13 toys have been recalled by the CPSC.[1] The recalled toys posed risks including high levels of lead, potential foreign-body ingestion by a child and choking because of small parts from easily broken toys. In addition, PIRG Education Fund researchers found two additional recalled products — a hoverboard and a children's watch accessory — that many would consider toys.[2]

These days, toys with safety risks are less likely to be found at traditional retail stores, which stock toys from importers and manufacturers that are required to have a Children's Product Certificate (CPC).[3] The CPC designates that the toy follows all applicable federal safety standards for children.

But when shopping on websites that act as the middleman between the customer and the seller, consumers can encounter hidden hazards. The middlemen do not consider themselves to be traditional retailers and therefore often do not follow the same rules that a traditional retailer would. Whereas the retailers must receive a certificate of compliance from a manufacturer before selling a toy, not every toy sold online may be covered by a CPC.[4]

Further, what is described in the website listing might not be the toy that arrives at your door. The toys could even contain toxics, and most parents don't have access to labs that could test for harmful substances. In this report, we share our best tips on how to identify potentially unsafe toys sold online and in stores.

**Bad actors have found success selling fake goods on websites that consumers know and trust.**

The CPSC estimated that there were 198,000 toy-related injuries treated at emergency-rooms in 2020.[5] This is a notable decrease from toy-related injuries reported from 2013 to 2019, when injury reports ranged from 224,200 to 251,700 per year.

With many Americans staying at home more during 2020, the increased supervision could account for this drop in toy-related injuries. The best way to keep a child safe from injury from a toy is to keep an eye on them, look out for any broken toys and to ensure the toys are age appropriate.

Our 36th annual Trouble in Toyland report calls attention to seven toy safety issues, along with tips to minimize the risk in your home.

# KNOCKOFF TOYS

WHEN WE THINK of a knockoff, we often think of the purses and other high-end, designer goods that are sold by a corner grocery store. A cheap copy. For a long time, that's what knockoffs, or fakes, appeared as. Now, unsuspecting consumers can find knockoffs and counterfeits online of many types of goods.

Counterfeits are identical copies that infringe on trademarks; knockoffs are products that are nearly identical to another product. For the purpose of this report, both counterfeit and knockoff toys will mean toys that are misrepresentations to the consumer. Whether a cheap copy or blatant counterfeit, they represent the same hazards to the consumer if not properly tested for safety.

Bad actors have always been around, but they have found success in selling fake goods on websites that consumers know and trust. Well-known websites such as Amazon and Walmart Marketplace act as a third party for billions of dollars of sales.[6] And of course, eBay was designed exclusively for third-party sellers.[7] They are the middleman, connecting the customer to the seller. With legitimate sellers who follow the rules, this is a great system. It allows businesses to grow and consumers to have more options. But when it comes to toys, which have stricter safety regulations, a bad actor could do a lot of damage.

A counterfeiter can produce a toy for much cheaper than a legitimate manufacturer. They can use faulty materials, not participate in any safety testing and then market the toy with images that look similar to the brand that consumers already know. If they get caught, it's not a big deal to the bad actor.

They can simply create a new listing under a new seller name.[8] Jeff Myers, senior director for Intellectual Property at Apple, testified to Congress last year that the problem is "a game of whack-a-mole" for websites that monitor counterfeit listings.[9]

A report by the Office of the United States Trade Representative (USTR) says that when customers purchase items on familiar websites, it gives the products more authenticity.[10]

The imposters can be difficult to spot too. The USTR found that, "One fast, easy, inexpensive and common tactic is to set up accounts on social media platforms and use posts or targeted ad campaigns to advertise counterfeit and pirated goods." Using marketing similar to well-known brands, counterfeiters will try to deceive consumers into believing that the product is a legitimate item that was bought in bulk and ask for payment through an online payment service. If the marketing looks legitimate, why would a customer doubt it?

In October 2020, Red Points, a brand intelligence platform, surveyed 1,000 consumers who had purchased games and toys online during the past holiday season.[11] More than half of respondents, 53.8 percent, believed they had purchased a counterfeit toy or game, with an additional 7.8 percent being unsure. Red Points also found that 52 percent of toys and games brands reported an increase of counterfeits online.[12]

Counterfeit products aimed at holiday shoppers, including some toys that pose safety risks, are such a big problem that U.S. Immigration and Customs Enforcement officials started conducting Operation

Holiday Hoax in 2009.[13] The coordinated effort to find and seize counterfeit or pirated goods also involves the CPSC, the U.S. Postal Inspection Service and other offices. Government officials say "the production and trafficking of counterfeit goods poses a significant health and safety threat to consumers."[14]

To add to the complexity of online shopping, supply chain issues have affected manufacturing and distribution for the upcoming holiday season.[15] Consumers can expect to have more difficulties shopping for the perfect toy this year, especially from the genuine, original manufacturer.

When it comes to fake toys, there are significant safety concerns. Primarily, knockoff products aren't as likely to adhere to strict toy safety laws. Reputable brands have to be tested for compliance with more than 100 safety standards required by law.[16]

Other safety concerns include toxics, where a knock-off toy may have lead or other added chemicals that can be dangerous to a child's health. Safety testing for small parts, toxics, and use and abuse is important because we know how children use toys. They put them in and around their face or throw them at the ground. Without adequate safety testing, a parent cannot be assured that their child's health is not at risk. Counterfeit toys could flaunt any of the existing safety standards, but we found evidence of safety problems with counterfeit items in several of the traditional categories of hazards, including: toxic chemicals, fire and small parts.

## Toxics

Just last month, U.S. Customs and Border Protection (CBP) officials in Baltimore said they seized a shipment of toys from China that contained toxics.[17] The shipment of seven boxes that had previously been detained pending investigation included 295 packages of Lagori 7 Stones, a popular children's game that involves children throwing a ball at seven stacked square stones. CBP sent nine samples for lab analysis.

The CPSC analysis showed the toys were coated in lead, cadmium and barium that exceeded safe levels for consumer products. CBP said the toys were headed for Virginia.

Lead, cadmium and barium -- all heavy metals -- are sometimes improperly used in toys such as blocks, figurines and jewelry items that are either yellow, red or black.[18]

Lead exposure can be dangerous to anyone, but for children, lead can impair their brain and nervous system, delay development and cause learning and behavior problems.[19] Cadmium is a known carcinogen and also can affect brain development in children.[20] Barium is also toxic and can cause difficulty breathing and issues with blood pressure, numbness and muscle paralysis.[21]

There are several other cases of toxic counterfeit toys seized in the last few years:

- In November 2019, government agencies and law enforcement again teamed up for Operation Holiday Hoax, a sting operation conducted in conjunction with international partners to prevent counterfeit goods from entering the market.[22] After searching a shipment of toys from China, they found 155,000 suspected counterfeit toys. The valued retail cost would be over $5.4 million

dollars if they were the real version of the toys, showing the incentive to bad actors.

Some of the counterfeit toys seized tested positive for lead content, a safety hazard that would go unnoticed by consumers. Genuine toys must undergo safety testing to prevent toys that exceed federal lead limits from being sold.[23] [24]

- U.S. Customs and Border Protection Office of Field Operations officers working at the International Falls, Minn., Port of Entry in 2018 seized counterfeit toys and other products that were suspected of containing lead. Lab tests showed the toys contained excessive levels of lead and officials seized 2,459 carrying cases for diecast toy cars.[25]

- Counterfeit toys can also include other unsafe chemicals. Phthalates are a group of chemicals often used as additives to soften plastics or make plastics flexible but are dangerous to children.[26] Last year, the European Commission issued safety alerts about counterfeit L.O.L. Surprise! dolls shipped from China that were seized in different cases by officials in the United Kingdom and Czech Republic. The dolls contained phthalates.[27]

  In April 2018, the CPSC ruled that children's toys with more than 0.1 percent of any of eight different types of phthalates are banned from being sold after assessing possible health risks to children.[28] The National Institute of Environmental Health Sciences (NIH) lists phthalates as a common "endocrine disruptor," with the potential to cause problems with development, the reproductive system, the brain and the immune system.[29]

- In the United Kingdom in 2020, the Warwickshire County Council Trading Standards warned parents about counterfeit Disney Frozen II dolls after testing the seized dolls and finding phthalates.[30]

Most parents and caregivers do not have access to lab testing. Even when purchasing toys that are not counterfeit, toxics are a particular challenge for consumers, especially because toxics cannot be identified by looking at the toy or the packaging.

Consumers are reliant on the safety regulations that aim to prevent hazardous toys from making it into their shopping carts. The fact that counterfeit toys come with no guarantee that they meet those safety standards is why they represent a unique threat, especially for hazards like toxic chemicals that a consumer can't identify themselves.

## Fire Hazards

Hoverboards have also been the subject of dangerous counterfeits. In 2016, the U.S. Customs and Border Protection Chicago field office seized more than 16,000 counterfeit hoverboards.[31] With an estimated retail value of more than $6 million, some of the counterfeit hoverboards had false trademark logos and seals of approval from a lab that tests and certifies products for safety.[32] Counterfeit hoverboards, powered by lithium-ion batteries, had been suspected of catching fire while being used and being charged.[33]

When shopping for hoverboards, and other products that are powered by lithium-ion batteries, it is important to look at labels, packaging and contents.[34] Underwriters Laboratories — a safety certification company — advises consumers to inspect hoverboards for signs of poor quality, to compare battery information with what is available from the original manufacturer and to look for inappropriate certification labels on batteries.[35]

## Small Parts

Counterfeit toys can be made out of faulty materials that can rip and break. This can create small parts, a known choking hazard. Without undergoing safety tests, a counterfeit toy may not be strong enough to withstand a child playing with it.

A popular toy this holiday season is the Go PoP!, originally sold by FoxMind.[36] The Go PoP! is a rubber push pop toy that is made out of silicone. The popularity of this toy has led to hundreds of less expensive knockoff options, found online or in retail stores. With so many options, it can be confusing for consumers to know which are being sold by reputable sellers whose products have undergone safety testing.

The GoPop! toy's packaging has a label saying "WARNING: CHOKING HAZARD! Not suitable for children under 3 years." PIRG toy researchers found a listing called 2 Packs Pop Fidget Sensory Toys that does not include an age warning on the listing or the packaging.[37]

FoxMind's GoPop! has led to numerous knockoff toys.

On the Amazon listing, the product description shows an image of a baby with the push pop toy in its hand and shows other children who could be under the age of 3. If a version of the push pop toy had not been tested for safety ripped, it could create small parts and be a choking hazard for young children. The 2 Packs Pop Fidget Sensory Toys had several reviews describing a flimsy material, with one review saying that, "Fun thing for the kids, but one of the "bubbles" tore the first day."[38]

A toy doesn't have to break to be dangerous to young children. Counterfeit toys sometimes don't carry warning labels for small parts. Parents can test for small parts by using a toilet paper tube in their home. It is larger than the CPSC's testing cylinder for small parts, but it can help parent's judge the safety of a toy before giving it to a child.[39]

## TAKEAWAYS:

- **A website listing can offer clues that the product may be a counterfeit. When looking at a toy's product description, watch out for misspellings, mislabelings and low-quality pictures.**

- **When on a website that acts as a middleman between the seller and buyer, shoppers should look at the seller information. Clicking on the seller's information can tell you what other items they sell, where the business is located and feedback on its products.**

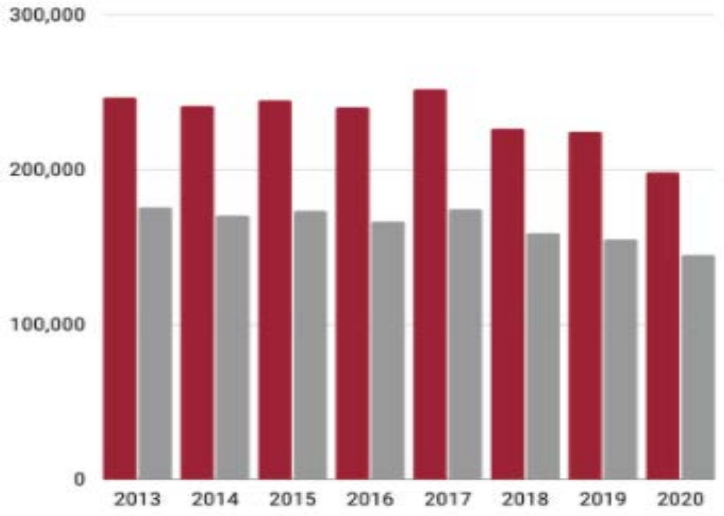
- **Consumers can do an internet search on the seller. If the seller has a website or has listings on other websites that operate as the middleman, you can compare the toy listings to see any discernible differences.**

- **Prices can tell a lot about the product listing. If a toy seems significantly less expensive than similar items, it could be a fake.[40]**

- **Look at the reviews. Consumers often think that if a listing has five stars, it can be a good find. But sellers can purchase reviews. If a review sounds too good to be true, it probably is.**

- **If a toy listing looks suspicious, consumers can reach out to the seller about the authenticity of the product. If the seller does not respond, or if the answers don't leave parents confident about the toy's safety, it's best not to purchase the toy.**

## Toy-Related Injuries Treated in ERs, 2013 to 2020




Red is all injuries. Gray is 12 years or younger.

Source: National Electronic Injury Surveillance System (NEISS)

# SECOND-HAND TOYS

ANOTHER SAFETY CONCERN in the online marketplace is toys that were previously recalled. When these are listed on well-known websites such as eBay or Facebook Marketplace, prospective buyers may not know about any recalls.

It is illegal for any resale seller to sell a product they know or should know has been recalled, unless the safety issue has been fixed.[41] If the product has met the requirements of the remedy, then it is legal to sell again. For example, say a toy is recalled for a faulty battery. But under the remedy section of the recall, it says that the customer can contact the company for a battery replacement. If the battery is replaced, the toy can be sold again.

But with toys being resold online, there is no way for customers to verify whether a recalled toy has been fixed. Website listings generally don't even indicate the toy was once recalled.

Here's a recent example: the CPSC recalled Clip Clop Infant Activity rattles on April 14, 2021, because the plastic handle could come loose, allowing small beads to come off. The beads present a choking hazard.[42]

PIRG researchers found a listing for the same rattle on eBay on Sept. 10.[43] In the recall, customers could contact Playgro for a free replacement rattle. The pictures from the recall and the pictures from eBay are identical. On the eBay listing, there's no indication that batches of the rattle were recalled months earlier. There's also no way for the potential purchaser to know whether the rattle was the replacement from Playgro.

PIRG identified another potential problem on eBay on Sept.16.[44] The eBay listing for the Janod Confetti Live Musical Set states that the toy set is imported from France and is "near impossible to find in the US!"

On Jan. 13, 2021, Janod Toy Confetti Trumpets were recalled because small plastic parts in the toy trumpets could become loose and be swallowed by a child, posing a choking risk.[45] Similar to the Playgro rattle, the toy trumpet in the recall is identical to the toy trumpet shown in the eBay listing and there is no mention of the recall that took place earlier in the year.

The toy trumpets did not have a remedy that would fix the product and customers were informed to dispose of the toy.[46] No other toy musical item in the Janod musical set was recalled other than the trumpet.

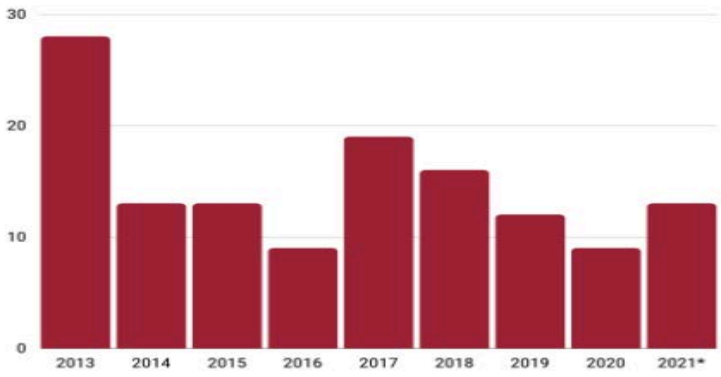
Another problem with second-hand toys: toy safety standards with toxics have evolved a lot in the past decade. Under the Consumer Product Safety Improvement Act (CPSIA), lead levels for toys had to be 100 ppm (parts per million) or less by August 2011.[47] The CPSIA also prohibited three different types of phthalates (often added to soften plastics in children's toys) if the level exceeded 0.1 percent. Five more types of phthalates were added to the banned list in 2018.

This means that toys made before August 2011 may have higher levels of toxic chemicals. Established resale shop owners may be more aware of these rules than the average seller on Facebook Marketplace or Craigslist who are looking to sell things from their home. But buyers generally are not.

## TAKEAWAYS

- **Online shoppers can be proactive by searching what year the toy was manufactured and finding out more information about the toy through an online search before purchasing.**
- **When shopping online for second-hand toys, check out saferproducts.gov to find out about any past recalls. If a toy has been recalled in the past, consumers can ask sellers what the model number is for the toy and use the recall information to ask about distinguishing marks between recalled toys and new versions of the toy. Unless the seller can give information about the model number or a remedy completed on a recalled toy, it's not a safe purchase.**
- **The CPSC should continue to research the health effects of phthalates and to strengthen current standards in accordance with the results.**

## Toys recalled by the CPSC, 2013 to 2018




Source: U.S. Consumer Product Safety Commission
* 2021 data is as of Oct. 21

# INGESTION RISKS

RESEARCH RELEASED in October by the American Academy of Pediatrics (AAP) found that the rate of ingestion for magnets and disc batteries has increased since the start of 2017, while the rate of foreign-body ingestions overall remained consistent.[48]

In August 2021, the CPSC recalled about 10 million units of Zen Magnets and Neoball magnets.[49] This large recall took place after Zen Magnets LLC and the CPSC were informed about two children who ingested Zen Magnets and required extensive surgery for their removal. A 9-year-old girl had to spend six days in the hospital recovering after surgery to repair holes made in her intestines.[50]

Magnets similar to the Zen Magnets are still sold and marketed as toys. High-powered magnets, also referred to as "rare earth" magnets, have a much stronger magnetic force than ordinary magnets. They pose a serious danger if more than one high-powered magnet is ingested.

Two or more magnets can attach to parts of the digestive tracts and cause life-threatening holes to organs. The CPSC said one toddler died and there were 19 cases of children ages 10 months to 11 years who had surgery after swallowing magnets.[51] New data released in October 2021 showed there were 1,072 cases of magnets ingested from 2010 to 2020 that were reported by hospitals, but not every hospital reports to the CPSC.[52] Of those 1,072 cases:

- 110 cases were associated with magnet toys.
- 11 cases were associated with magnet toys that fell under the American Society of Testing and Materials (ASTM) F963 safety standards.
- 58 cases were associated with magnet sets.
- 793 cases were unidentified magnet ingestions.

The National Electronic Injury Surveillance System (NEISS) estimated that societal costs were $47.6 million for magnet sets, magnet toys and jewelry ingested from 2017 through 2020.[53] Depending on the necessary treatment, the average case ranged from $13,000 for injuries treated in physician's offices, clinic and other non-hospital settings to $166,000 for injuries that required treatment in the hospital. This estimate does not include unidentified products types involved with magnet ingestions, with the NEISS speculating that the total societal cost could be more than $150 million from 2017 through 2020.[54]

Young children are not the only group affected. Teenagers have also ingested magnets after trying to replicate piercings on their nose or mouth.[55] The risk that magnets pose to the body remains the same no matter what age a child is.

While the Zen Magnet recall is an important step forward, PIRG toy researchers found other listings for high-powered magnets advertised as desk toys. Buckyballs and Buckycubes, originally sold by Maxfield and Oberton Holdings, LLC before the company dissolved, were recalled in April of 2013.[56] After a 10th Circuit Court of Appeals reversed a CPSC ban recalling high-powered magnets, Buckyballs could be sold again.[57] PIRG toy researchers found both Buckyballs and Bucky cubes sold on two websites advertised as the Buckyballstore

and BuckyballsCube.[58]

PIRG researchers also found magnet toys listed on Amazon. The G-WACK Stress Relief Desk Toy was purchased for $15.99.[59] The toy set comes with a magnet base and several sizes of magnetic and metallic balls ranging from 0.2 to 0.55 inches. In the product description, it says, "The magnetic base transmits attractive force, the steel ball is not magnetic."

PIRG Education Fund found that the steel balls measuring at 0.2 inches — smaller than a dime — are magnetic. The other balls in the set that are larger in size are not magnetic.[60]

The packaging for the magnet set says it's aimed at ages 14 or older, but the description under product information on Amazon says that the manufacturer recommended age is 14 *months* and up.[61] There is no information on the strength of the magnets on the toy listing or on the packaging the toy arrives in.

No matter whether there is an error on Amazon's website involving the description of the toy and the age recommendation, it can be misleading to parents who may buy it for their children. If a small child were to find this toy in the household, the magnets could be easily swallowed, especially if parents believe all the balls in the set are steel and not magnetic.

Batteries are another safety risk for foreign-body ingestion in children. Coin batteries contain lithium and button batteries do not, but both have a similar small disc shape and can cause the same health risks if ingested.[62] The batteries can cause burns inside the body if swallowed.[63] Both types of batteries can be found in a range of toys.

The National Capital Poison Center (NCPC) reported there were 1,843 button battery ingestions in children 6 years or younger in 2019, with 1,502 of those cases requiring medical treatment.[64] When comparing the estimated injuries related to batteries for March through September of 2019 and 2020 the CPSC found injuries rose 93 percent for children aged 5 to 9 years old.[65]

Earlier this year, K&M International recalled its Wild Republic Slap Watches because the coin cell battery could fall out and be ingested by children.[66] With toys and children's accessories, it's important that batteries are secured. If they can slip out easily or if the toy has been broken, keep it away from children.

# TAKEAWAYS

- **The CPSC should take strong enforcement action to prevent high-powered magnets from being sold on the market.**

- **The CPSC should use the rulemaking process to strengthen product standards to prevent button and coin battery ingestion. PIRG Education Fund supports Reese's Law, introduced in September. It would require the CPSC to enact a rule enforcing child-resistant closures on consumer products that use such batteries.**
- **The AAP recommends households with small children not have high-powered magnets.[67] With toys that have button or coin batteries, check that the battery compartment has a screw and is child proof. If a battery can slip out, the toy is not safe for a child to play with.**

# CHOKING HAZARDS

FOR YOUNG CHILDREN, one of the biggest toy dangers are small parts that are choking hazards. According to the CPSC, a small part is an object that fits completely in a test cylinder that is 2.25 inches long and 1.25 inches wide.[68] The testing cylinder replicates the size of a fully expanded throat of a child under 3 years old. Small parts can include toys, but also game pieces and other fragments found in toys.

A toy that is meant for children ages 3 to 6 is required to have a warning label if it includes small parts. Toys meant for children under age of 3 cannot include small parts.[69] It has become more rare to find toys with small parts that are not properly labelled at a traditional brick-and-mortar store. When shopping online, a consumer can experience more difficulty sorting through listings that may be advertised for a certain age, but when reading the fine print, has a different age recommendation.

If you type in "toys for children age 2" when shopping online, the results can include toys that are meant for children older than 2. We searched "toys for children age 2" on Amazon. The page was sorted by "Featured." Ten out of the first 20 listings had conflicting age descriptions.

- Six of the toy listings had a warning label on the product page on Amazon saying "CHOKING HAZARD --Small parts. Not for children under age 3."

- Five of the toys listings had the manufacturer age recommendation as "3 years and up" under the product description.

- One of the toy listings had a manufacturer age recommendation as "6 years and up" with no mention that the toy could be used by a child under the age of 3.

When shopping online, a general search can include toy listings with mislabeled age recommendations. Age recommendations from the seller may not be consistent with what is first described about the toy and what the manufacturer recommended age is. If there is a choking hazard warning on the toy listing, a parent should not purchase it for a child under the age of 3. With products with conflicting age descriptions, parents can use their best judgement to decide whether it is a worthwhile purchase and inspect the toy before giving it to a young child.

In a report earlier this year, the CPSC said an 8-month-old boy died in 2020 after swallowing a nail-shaped plastic toy.[70] The CPSC did not release what toy the child had swallowed, but parents should be wary of toys that could be near-small parts. In 2006, Playskool recalled its Team Talkin' Tool Bench toys after the plastic toy nails were associated with two deaths of children, who were both under the age of 3.[71] The Team Talkin' plastic toy nails were not considered a small part under the safety standard test, which is still the same test used today.

Parents and caregivers should use discretion when allowing their children to play with toys that could be too small to be safe. One way that parents can test small parts in their home is by using a toilet paper tube. A toilet paper tube is bigger than the CPSC test cylinder and can be easily accessible in the home instead of purchasing a replica test cylinder online. Any part that fits in the tube

could be dangerous for children under the age of 3.

The majority of toy recalls in 2021 were because of small parts, with many being recalled because the toy could break into small parts or release small parts. A teether ring sold by Hallmark was recalled because the wooden ring could split into small parts.[72] Another toy, a wooden tray puzzle, was recalled because it had several puzzle pieces that could break into small parts.[73] Parents should check to see whether toys are broken, especially if they will be used by or be around a child under the age of 3.

Other choking hazards in the home can be items that appear harmless but should not be used by young children. Some plastic and rubber balls fall in this category. Not all plastic balls are marketed for children specifically ages 3 to 6 and the packaging may not include a warning label. Rubber bouncy balls are typically labelled for children 3 and older and will include a warning label when sold by a reputable seller. But the label helps only so much: a 4-year-old girl died last year after a rubber bouncy ball was lodged in her throat.[74] Parents should use discretion when looking at toy sizes and should be aware that small parts are not only a risk for children under the age of 3.

Latex balloons are also a choking hazard for children under the age of 8 years old.[75] In the CPSC report, the agency reported three children's deaths in 2020 related to balloons obstructing a child's ability to breathe.[76] Balloons have been the leading cause of suffocation death in children and should be kept away from children unless under adult supervision.

# TAKEAWAYS

- **The CPSC should consider a more protective small parts test. Children under the age of 3 have died from toys that were bigger than the small parts test and children older than 3 have died from toys considered safe for their age demographic.[77]**

- **Parents should evaluate toys and any pieces based on how their child will interact with it, and check whether toys are broken, especially if they will be used by or be around a child under the age of 3.**

# NOISY TOYS

PARENTS OFTEN don't make the mistake of buying an obnoxiously noisy toy for their children more than once. Kids never seem to tire of the annoying beeps, whistles and bad carnival music, but the noises can be headache-inducing for adults.

Some of these noisy toys can also be harmful to a child's hearing.

We may think of our teens playing their music too loud, especially with headphones or earbuds. But innocent-looking toys for children as young as 1 year old can be a threat to their hearing.

We tested five toys that we suspected may register at potentially unsafe noise levels, based on online reviews. We used two different decibel meters, made by different manufacturers. Four of the five showed reason for concern. Toys with noises that hit 80 decibels or more can damage a child's hearing if the exposure lasts too long.[78] Normal conversation is about 60 decibels; a lawn mower is about 90 decibels.

"It really does matter where the toy is held," Dr. Tricia Ashby-Scabis, director of audiology practices for the American Speech-Language-Hearing Association (ASHA), told PIRG Education Fund.[79]

"For a child's ear – I would be incredibly concerned about 80 decibels, and even more so with toys reaching 100 decibels," she said.

It's important to remember that most of us are exposed to varying degrees of sound much of our days; household noise can be 50 to 80 decibels.[80]

"If you look at the World Health Organization-ITU standard," Ashby-Scabis added, "you will see guidance that a child should not have more than eight hours of exposure a day to a 75-decibel sound, which then drops to less than four hours a day to a 77-decibel sound, then less than two hours a day to an 80-decibel sound, and so on."

For toys specifically, she said: "I would like a child's toy to be below 80 decibels," she said. "Repeated noise exposure can cause damage. Noisy toys over the long run can have a long-term impact on that child's hearing health, even as they move into adulthood."

Toys are required to meet American Society of Testing and Materials (ASTM) standards, which set the maximum allowed sound-pressure level at 85 decibels, as measured at 50 centimeters (about 20 inches, which is longer than the typical adult's arm) away from the toy. But the Sight and Hearing Association says toys should be tested based on how a child may interact with it. In many cases, the toy would be right next to the child's face.[81]

This certainly would seem to be the case with two of the toys we tested -- toy cell phones. Of course, a child will at times mimic adults by holding the toy cell phone right next to their ear. We tested the toy cell phones touching the decibel meters, as well as the music-playing TV remote and car remote. The sale listings show photos of all of the products touching the children's faces, except for the car remote.

The Elf Lab Baby Cell Phone Toy, which we bought for $15.99, was tested four times on each decibel meter with the option that

sings the A, B, Cs.[82] It registered from 93.4 to 95.4 decibels on one meter and 101 to 106.6 decibels on the other meter. The readings vary in part because of fluctuations in the song.

The other cell phone, by Click N' Play, registered 86.2 to 87.2 decibels on one decibel meter and 99 to 100.1 decibels on the other meter. This was part of a set of three toys that sold for $13.29.[83]

Another toy, the Kicko Toy Gun, which we bought for $11.99, registered from 101.7 to 107.2 decibels on one meter and 104.1 to 113.2 decibels on the other meter.[84] We also tested this about two inches from the decibel meter.

The Click N' Play set came with two other toys. We also tested them touching the decibel meter. The product listing shows the TV remote against the child's ear and the car remote opener a few inches away. A TV remote registered from 79.2 to 80.5 decibels on one meter and 83 to 85.7 decibels on the second meter. A car remote opener registered at levels less than 80 decibels.

## TAKEAWAYS

- **ASHA has some commonsense advice for caregivers: If a toy you're considering buying sounds loud, don't buy it. If you already have a noisy toy at home that you're concerned may be too loud, you can take the batteries out so it doesn't make noise or put duct tape over the speaker to stifle the sound. Or you could always choose to get rid of the toy.[85]**

- **Most parents don't test their children's toys with decibel meters. But they still can be mindful of the risks.**

- **"Parents should be concerned about their child's noise exposure," said Ashby-Scabis of ASHA. "Noise exposure is cumulative, and it slowly degrades hearing acuity over time. Toys that have greater sound output are impacting children in real time, and certainly their future hearing health."**

# SMART TOYS

SMART TOYS can be a hot item on a children's holiday list. They can speak with a child, play music and help them learn as they grow. Smart toys also increase security risks, like data being collected on a child, a hacker gaining access through a Bluetooth connection or children being exposed to inappropriate content.

Not all smart toys are bad. Under the Children's Online Privacy Protection Act (COPPA), if a toy collects personal information from a child less than 13 years old, the toy company is supposed to tell parents about its privacy practices, ask for parental consent and give parents the right to have their child's personal information deleted.[86]

But even the slightest risk to a child's privacy is concerning. We've seen several high-profile cases of creepy toys that collected recordings of underage children.[87] Now, in addition to recording children themselves, some toys have the ability to record information about your home and family.

A newer toy that hit the market is the Mario Kart Live Home Circuit, an augmented reality toy.[88] It uses a camera to capture an image of the room the game is being played in to turn it into a virtual race course. The game prevents the user from taking screenshots or video, but already people have found means to livestream and record what is displayed on the Nintendo Switch screen.[89] PIRG researchers found that the Mario Kart's camera picked up everything in the room, including the layout, expensive items and other things that could reveal the user's identity or location. It's a scary thought that information about what the inside of your home looks like could be revealed if a child were to upload images without realizing the consequences or if the game system is hacked.

Toys that can connect to Bluetooth present safety concerns at a different level. The Singing Machine, a Bluetooth karaoke microphone, doesn't require a pin code or other verification to connect to the device via Bluetooth.[90] This means anyone within a 10-meter connection radius could pair their phone to the toy and start playing audio out of the speaker when the device is turned on. PIRG toy researchers were able to connect to the Singing Machine from outside of their home at about 30 feet away. A bad actor could connect to the device and play anything from an explicit song to a voice recording telling a child to come outside.[91]

A darker plot could involve hackers using the toy to talk to other smart devices like Amazon Alexa.[92] The Singing Machine is one example of Bluetooth-connected toys. There are other Bluetooth karaoke microphones sold on Amazon that could present the same problem if not protected by a verification before a device is connected with Bluetooth.[93]

Smart toys work on three levels. Design flaws or privacy shortcomings at any of these levels can pose risks for a child's privacy.[94] First, there's the actual toy that a child interacts with. Cameras and other recording devices are what to look out for here. Then there can be a mobile app, which connects the toy to the Internet. This Internet connection could expose kids to inappropriate content. Lastly, there may be a personalized online account that stores data specific to the toy and its user. In the case of

hacking, this personal information could get leaked. Here are some examples of smart toys that present risks at each of these levels.

A previous Trouble in Toyland report highlighted My Friend Cayla dolls that raised alarms because the doll was easy to hack.[95] The dolls use recordings and artificial intelligence to "get to know" a child. Germany banned the toys from sale, urging parents to destroy the doll.[96]

Cloud Pets are another well-known story of a smart toy turned recording device. The toys work like walkie-talkies, allowing kids and long-distance loved ones to send voice recordings back and forth. In a huge data breach scandal in 2017, an open database of more than 2 million voice recordings was hacked.[97] Many of the recordings were from children and the dataset was even held for ransom. In 2018, the Mozilla Foundation — a non-profit that works to keep the Internet an open global resource — found that the data issues revealed the year before had never been fixed.[98] The Cloud Pets still directed customers to an unsecure website. Major toy retailers stopped selling Cloud Pets by June 2018 — including eBay — but PIRG Education Fund researchers found Cloud Pets are still for sale on eBay.[99]

App-controlled or connected toys can also be risky if they allow children to download content that is created by other users, rather than the manufacturer itself. Through these apps, children can interact with content that may not have been screened to make sure it's age appropriate.

Experts from the NCC Group — a global cyber ware and security assurance firm — investigated app-connected toys for security loopholes.[100] The Mattel Bloxels Build Your Own Video Game works by putting together "blocks" of code to make a video game.[101] Kids can use blocks that are preprogrammed by the toy's manufacturers or they can use blocks that are created and uploaded by other users. Researchers uploaded a block with inappropriate language to the Bloxels arcade where it could be accessed by any other child using the app. While this specific toy was discontinued by the manufacturer, it is still sold on Amazon.[102] For any "learn to code" types of toys, it is important that parents are present when additional information is downloaded from apps or websites. The best safety feature for a "learn to code" toy would be one that requires a parental password before a child could download content from sources other than the manufacturer.

App-connected toys sometimes require an online account or profile. Security failure at this level could mean exposing personal information about your child and family. A tale of warning is the case of VTech. In 2018, VTech came under fire from the FTC because the company was collecting data on more than 600,000 children through its Kid Connect app.[103] This was a violation of COPPA, which requires that a company tell parents when they're collecting data on kids under 13 years old.

## TAKEAWAYS

- **Even if companies tell parents about the data they're collecting and get their consent, the online profile where this data is stored could be hacked if a company were to allow companion accounts to use weak passwords that leave data open to bad actors.**

- **Before buying a smart toy, read its description to understand what technology it uses and how your**

**child will interact with it. It's a good idea to search the toy's name and the manufacturer online to see if either have sparked any privacy concerns. Look for COPPA approval, too.**

- **For toys that require some sort of online account registration, it is important that adults are present to set it up with a strong password. Only submit the minimal amount of personal data needed to make the account. You should also read the company's terms and conditions to see how your data will be stored, who has access to it, what happens if the company is hit by a cyberattack and whether the company will notify you of any problems found with the toy.**

# GAME CONSOLES

GAME CONSOLES are always a popular item for children around the holidays. Before purchasing, parents should try to make sure the video game consoles will not expose their children to inappropriate content or online strangers by seeing whether the game console has parental controls for family accounts.

Major game consoles — Nintendo, PlayStation, Xbox — have these controls.[104] Parental controls exist on various gaming consoles and can allow complete control over access to online games, access to online chats and how much money can be spent.

Parental controls can also limit verbal communication between a child and online players. Each game console has different abilities. With game systems that require a headset for verbal communication, like Xbox, a parent does not have to buy the headset.[105] Other systems, such as the PS5 do not require a headset for verbal communication.[106] Nintendo systems require an app for communication.[107]

## TAKEAWAYS

- **Parents should research game console systems to help them prevent communication they would not want their child exposed to.**

- **If a game console needs a headset for verbal communication, you don't have to buy it. Without the headset, a child could use a chat forum that, with the right game system, a parent would be able to monitor. If a game system supports verbal conversations without a headset, parents would have more opportunities to casually or intentionally supervise who's talking with their children and what's being said.**

# CONCLUSION

EFFORTS TO MAKE toys safer should never stop. And parents and caregivers should remain vigilant about the products they allow children to play with, particularly making sure young children aren't exposed to products they might use in a way to cause harm.

**Recommendations:**

- Congress should pass the INFORM Act. The Integrity, Notification, and Fairness in Online Retail Marketplaces Act, introduced in March, would require online merchants to collect, verify and disclose certain information from high-volume, third-party sellers. The goal of the bill is to thwart sales of stolen, counterfeit or dangerous consumer products -- toys and other kinds of merchandise.

- The CPSC should continue to research the health effects of phthalates and to strengthen current standards in accordance with the results.

- The CPSC should take strong enforcement action to prevent high-powered magnets from continuing to be sold on the market.

- The CPSC should use the rulemaking process to strengthen product standards to prevent button and coin battery ingestion.

- Congress should pass Reese's Law, introduced in September, which would require child-resistant closures on consumer products that use such batteries.

- The CPSC should consider a more protective small parts test. Children under the age of 3 have died from toys that were bigger than the small parts test and children over the age of 3 have died from toys considered safe for their age demographic.

# METHODOLOGY

**Online shopping for “toys for children age 2”**

We searched for “toys for children age 2” on Amazon under the “Featured” page. To see what first results would be suggested, we did not select any categories to sort the listings. We went through the first 20 listings and selected each to see what the age recommendation would be in the product listing.

For ten of the 20 listings, the toys did not conflict with the age recommendation of 2 years old. Six of the toy listings had a warning label on the product page saying “CHOKING HAZARD -- Small parts. Not for children under age 3.” Five of the toy listings had a manufacturer age recommendation labelled as “3 years and up” under the product description. One of the toy listings had a manufacturer age recommendation for “6 years and up.”

**Sound testing**

We selected three toys that we thought, based on online reviews, could be rather noisy. Two were cellphones that children would presumably hold close to their ears. The third was a laser gun.

All of the toys were ordered through Amazon and delivered the week ending Oct. 2, 2021.

We used two newly purchased decibel meters to measure the sound output of the toys: The first is RisePro Mini Sound Level Meter, model HT-80A. The second is V-RESOURCING, model VLT111. Both said they measure sound levels 30 to 130 dB. We tested each toy four times on each meter -- two tests each day on consecutive days. The testing was done in the same room. The windows were closed and there was no interior noise.

The Elf Lab Baby Cell Phone Toy, which we bought for $15.99, was tested with the option that sings the A, B, Cs. We tested this toy with it touching the foam of the decibel meter, mimicking the way a child might interact with the toy if they were imitating an adult on a cell phone. A photo on the sale listing shows a baby with the phone up against her mouth or chin.
The four measurements with each meter registered from 93.4 to 95.4 decibels on

one meter and 101 to 106.6 decibels on the other meter. The readings vary in part because of fluctuations in the song.

The other cell phone, by Click N' Play, registered 86.2 to 87.2 decibels during four tests on one decibel meter and 99 to 100.1 decibels during four tests on the other meter. We also tested this toy with it touching the foam of the decibel meter, mimicking the way a child might interact with the toy if they were imitating an adult on a cell phone. Photos with the sale listing show a young child with the phone up against her ear. This was part of a set of three toys that sold for
$13.29.

Another toy, the Kicko Toy Gun, which we bought for $11.99, registered from 101.7 to 107.2 decibels on one meter during the four tests and 104.1 to 113.2 decibels during the four tests on the other meter. We tested this about two inches from the decibel meter.

The Click N' Play set came with two other toys as part of the set. A TV remote that plays music registered from 79.2 to 80.5 during the four tests on one meter and 83 to 85.7 during the four tests on the second meter. We tested this toy touching the foam of the decibel meter; photos in the sale listing show the toy right up against two young children's ears. A car remote opener/ remote start registered at levels less than 80 decibels. We tested this toy two inches from the meter.

**Singing Machine Testing**

We selected the Singing Machine Kids Mood LED Glowing Bluetooth Sing-Along Speaker to test its Bluetooth connection after viewing an article online. We bought the toy for $39.99.

The toy was ordered through Amazon on Oct. 28 and arrived on Oct. 29.

We used a Stanley 33-730 tape measure that can measure up to 30 feet to test the distance of how far a person can be away from the Singing Machine and still connect to the device.

For the first test, we connected an iPhone to the Singing Machine using Bluetooth. After the Singing Machine was powered on, we were able to connect to the Singing Machine with no other verifications, such as a pin code. The Singing Machine does have a Bluetooth "pair" button. We did not have to push the button in order to connect to Bluetooth. The light above the "pair" button began to blink as soon as the Singing Machine was turned on.

Before the second test, we went to “Settings” on the iPhone, selected “Bluetooth” and then selected “Forget this device” for the Singing Machine. For the second test, we measured approximately 30 feet from the room the Singing Machine was located in to outside on the sidewalk. The distance between the Singing Machine and the sidewalk where the iPhone user stood had three doorways, with two doors closed and was down a flight of stairs. The iPhone user was able to connect to the Singing Machine through Bluetooth at a distance of about 30 feet from outside on the sidewalk.

To confirm the 30-foot distance, we conducted a third test. Before the third test, we selected “Forget this device” again for the Singing Machine on the iPhone. We measured out 30 feet from the room where the Singing Machine was located straight towards the back of the house. To have a complete 30 feet of the distance, the iPhone user had to be outside of the back door on the sun porch. The iPhone user was able to connect to the Singing Machine at this distance of 30 feet.

# APPENDIX

## TOYS RECALLED BY CPSC, 2013-2021

| Year | Toys Recalled | Time Period |
|---|---|---|
| 2013 | 28 | 1/1/13 to 12/31/13 |
| 2014 | 13 | 1/1/14 to 12/31/14 |
| 2015 | 13 | 1/1/15 to 12/31/15 |
| 2016 | 9 | 1/1/16 to 12/31/16 |
| 2017 | 19 | 1/1/17 to 12/31/17 |
| 2018 | 15 | 1/1/18 to 12/31/18 |
| 2019 | 12 | 1/1/19 to 12/31/19 |
| 2020 | 9 | 1/1/20 to 12/31/20 |
| 2021* | 12 | 1/1/21 to 10/18/21 |

*THROUGH OCT. 18

## EMERGENCY ROOM TOY INJURIES TRACKED BY CPSC, 2013-2020

| Year | Estimated Number of Toy-Related Emergency Department Treated Injuries (All Ages) | Estimated Number of Toy-Related Emergency Department Treated Injuries (12 Years of Age of Younger) |
|---|---|---|
| 2013 | 246,300 | 175,500 |
| 2014 | 240,900 | 170,300 |
| 2015 | 244,400 | 173,200 |
| 2016 | 240,000 | 166,300 |
| 2017 | 251,700 | 174,300 |
| 2018 | 226,100 | 158,800 |
| 2019 | 224,200 | 154,700 |
| 2020 | 198,000 | 144,700 |

# ENDNOTES


1. Janod Toy Confetti Trumpets, 10-in-1 Incredible Inventions Science Kits, Shepherd Boy Plush toys with wire staff, Clip Clop Infant Activity Rattles, B. toys Firefly Frank Infant Teethers, Children's Barhee Fishing Hero Toy Games, Disney Baby Winnie the Pooh Rattle Sets, Teether Rings with Decorative Fabric and Plush Attachments, 8-Pack Scent Stamper Pens, Ocean and Safari animal wooden tray puzzles, "Cutie Spoovel" children's eating utensils, Janod Children's Shaving Kits, Zen Magnets and Neoballs Magnets

2. Wild Republic Slap Watches, Hovertrax 2.0 Self-Balancing Scooters/Hoverboards with GLW Battery Packs

3. https://www.cpsc.gov/Business--Manufacturing/Business-Education/Business-Guidance/Retailers-Product-Safety-and-Your-Responsibilities

4. Interview with The Toy Association on Sept. 30, 2021

5. https://www.cpsc.gov/s3fs-public/Toy-Related-Deaths-and-Injuries-2020.pdf (pg. 12)

6. https://www.aboutamazon.com/news/company-news/2020-letter-to-shareholders (under "create more than you consume")
https://corporate.walmart.com/media-library/document/2021-annual-report/_proxyDocument?id=00000178-f54f-db6f-adfe-fdcf018d0000 (pg. 82)

7. https://investors.ebayinc.com/investor-news/press-release-details/2021/eBay-Inc.-Reports-Better-Than-Expected-Fourth-Quarter-and-Full-Year-2020-Results/default.aspx

8. https://www.dhs.gov/sites/default/files/publications/20_0124_plcy_counterfeit-pirated-goods-report_01.pdf

9.https://energycommerce.house.gov/sites/democrats.energycommerce.house.gov/files/documents/03.04.20%20Witness%20Testimony_Myers.pdf

10
https://ustr.gov/sites/default/files/files/Press/Releases/2020%20Review%20of%20Notorious%20Markets%20for%20Counterfeiting%20and%20Piracy%20(final).pdf (pg. 5 of report, pg. 8 of the pdf)

11. https://www.redpoints.com/pdfs/market-research-christmas-and-toys/?utm_campaign=HS294-market-research-christmas-and-toys&utm_medium=email&_hsmi=99447198&_hsenc=p2ANqtz-8gyg0pxZiQ2OmTMQJNZ348hVRlt3Lx5-jm1g9b1jxF1dEkGe3fFDKawviXRCA0qeEWzagkaz4z5L2HfQckAQnMZkERVQ&utm_content=99447198&utm_source=hs_automation (pg. 15)

12. https://www.redpoints.com/blog/counterfeit-toys/

13. https://www.ice.gov/news/releases/us-mexico-seize-more-80-million-during-operation-holiday-hoax, https://www.ice.gov/features/dangers-counterfeit-items

14. https://www.ice.gov/features/dangers-counterfeit-items

15. https://www.whitehouse.gov/cea/blog/2021/06/17/why-the-pandemic-has-disrupted-supply-chains/

16. Interview, The Toy Association, on Sept. 30, 2021

17. https://www.cbp.gov/newsroom/local-media-release/baltimore-cbp-cpsc-seizes-children-s-toys-excessively-coated-dangerous

18. https://www.sciencedaily.com/releases/2018/01/180126085435.htm

19. https://www.mayoclinic.org/diseases-conditions/lead-poisoning/symptoms-causes/syc-20354717

20. https://www.cbsnews.com/news/toxic-cadmium-found-in-chinese-toys/

21. https://wwwn.cdc.gov/TSP/MMG/MMGDetails.aspx?mmgid=321&toxid=57

22. https://www.ice.gov/features/dangers-counterfeit-items , https://www.iprcenter.gov/news/operation-holiday-hoax-seizes-counterfeit-toys-worth-more-than-5m

23. https://www.cpsc.gov/Business--Manufacturing/Business-Education/childrens-products

24. https://www.cdc.gov/nceh/features/leadpoisoning/index.html

25. https://www.cbp.gov/newsroom/local-media-release/cbp-officers-seize-counterfeit-dolls-toys-excessive-lead-levels

26. https://www.cdc.gov/biomonitoring/Phthalates_FactSheet.html , https://www.federalregister.gov/documents/2017/10/27/2017-23267/prohibition-of-childrens-toys-and-child-care-articles-containing-specified-phthalates (under "final rule")

27. https://ec.europa.eu/safety-gate-alerts/screen/webReport/alertDetail/10002045 , https://ec.europa.eu/safety-gate-alerts/screen/webReport/alertDetail/10000692

28. https://www.federalregister.gov/documents/2017/10/27/2017-23267/prohibition-of-childrens-toys-and-child-care-articles-containing-specified-phthalates (under "final rule")

29. https://www.niehs.nih.gov/health/topics/agents/endocrine/index.cfm

30. https://www.warwickshire.gov.uk/news/article/955/fake-dolls-a-danger-to-children

31. https://www.cbp.gov/newsroom/local-media-release/cbp-seizes-record-amount-counterfeit-hoverboards

32. https://www.chicagotribune.com/news/breaking/ct-hoverboard-seizures-met-20160127-story.html

33. https://www.chicagotribune.com/news/breaking/ct-hoverboard-seizures-met-20160127-story.html

34. https://agportal-s3bucket.s3.amazonaws.com/uploadedfiles/Another/Safeguarding_Consumers/chamberofcommerce_cpsc_online_counterfeits_final__2_.pdf

35. https://besafebuyreal.ul.org/sites/default/files/2020-11/UL%20Counterfeit%20Batteries%20eGuide_Interactive.pdf (pg.10)

36. https://foxmind.com/go-pop/

37. 2 Packs Pop Fidget Sensory Toys

38. https://www.amazon.com/product-reviews/B08SLZ712T/ref=acr_dp_hist_2?ie=UTF8&filterByStar=two_star&reviewerType=all_reviews#reviews-filter-bar

39. https://www.cpsc.gov/Business--Manufacturing/Business-Education/Business-Guidance/Small-Parts-for-Toys-and-Childrens-Products

40. https://agportal-s3bucket.s3.amazonaws.com/uploadedfiles/Another/Safeguarding_Consumers/chamberofcommerce_cpsc_online_counterfeits_final__2_.pdf

41. https://www.cpsc.gov/s3fs-public/ResellersGuide.pdf (pg 3-5)

42. https://www.cpsc.gov/Recalls/2021/Playgro-Recalls-Infant-Activity-Rattles-Due-to-Choking-Hazard

43. Playgro Clip Clop Horse Rattle Teeth Baby Plush Developmental Activity Toy

44. Janod Confetti Live Musical Set

45. Juratoys Recalls Toy Trumpets Due to Choking Hazard

46. Juratoys Recalls Toy Trumpets Due to Choking Hazard

47. Consumer Product Safety Improvement Act of 2008 - Public Law 110-314-Aug. 14 2008 (pg. 4 of pdf, Sec. 101 C), Total Lead Content Business Guidance & Small Entity Compliance Guide

48. https://www.aap.org/en/news-room/news-releases/aap/2021/childrens-ingestion-of-tiny-magnets-button-batteries-increased-significantly-during-pandemic-new-research-shows/

49. https://www.cpsc.gov/Recalls/2021/Zen-Magnets-and-Neoballs-Magnets-Recalled-Due-to-Ingestion-Hazard

50. https://www.zenmagnets.com/files/2020_09_22%2011_49%20AM%20Injury%20Report%20Scan.pdf (pg. 7 of pdf)

51. Magnet Safety Alert

52. https://www.cpsc.gov/s3fs-public/Proposed-Rule-Safety-Standard-for-Magnets.pdf?VersionId=2XizI5izY1OvQRVazWpkqdJHXg5vzRY_ (pg. 25 of pdf)

53. https://www.cpsc.gov/s3fs-public/Proposed-Rule-Safety-Standard-for-Magnets.pdf?VersionId=2XizI5izY1OvQRVazWpkqdJHXg5vzRY_ (pg. 127 of pdf)

54. https://www.cpsc.gov/s3fs-public/Proposed-Rule-Safety-Standard-for-Magnets.pdf?VersionId=2XizI5izY1OvQRVazWpkqdJHXg5vzRY_

55. https://www.cpsc.gov/Newsroom/News-Releases/2021/Ingestion-of-High-Powered-Magnetic-Balls-and-Magnetic-Cubes-Poses-Serious-Risk-of-Severe-Internal-Injury-or-Death-in-Children-and-Teens

56. Six Retailers Announce Recall of Buckyballs and Buckycubes High-Powered Magnet Sets Due to Ingestion Hazard , Buckyball magnetic toys recalled, ending legal fight

57. https://law.justia.com/cases/federal/appellate-courts/ca10/14-9610/14-9610-2016-11-22.html https://www.popularmechanics.com/culture/a24110/buckyballs-legal-us-2016/

58. Buckyballs magnetic balls , Buckyballs Magnets

59. G-WACK Stress Relief Desk Toys

60. G-WACK Stress Relief Desk Toys

61. G-WACK Stress Relief Desk Toys

62. Coin and button batteries (cells)

63. How Small Batteries Can Become Dangerous to Children

64. Button Battery Ingestion Statistics

65. Please review Effect of Novel Coronavirus Pandemic on 2020 Preliminary NEISS Estimates (pg. 9)

66. K & M International Recalls Slap Watches Due to Coin Cell Battery Ingestion and Choking Hazards

67. How High-Powered Magnetic Toys Can Harm Children

68. Small Parts for Toys and Children's Products Business Guidance

69. Small Parts for Toys and Children's Products Business Guidance

70. https://www.cpsc.gov/s3fs-public/Toy-Related-Deaths-and-Injuries-2020.pdf (pg. 7 of pdf)

71. Playskool Voluntarily Recalls Toy Tool Benches after the Death of Two Toddlers

72. Hallmark Recalls Teethers Due to Choking Hazard

73. Wee Gallery Recalls Wooden Tray Puzzles Due to Choking Hazard

74. https://www.cpsc.gov/s3fs-public/Toy-Related-Deaths-and-Injuries-2020.pdf (pg. 6 of pdf)

75. CPSC Warns Consumers of Suffocation Danger Associated with Children's Balloons

76. https://www.cpsc.gov/s3fs-public/Toy-Related-Deaths-and-Injuries-2020.pdf (pg. 6 of pdf)

77. Playskool Voluntarily Recalls Toy Tool Benches after the Death of Two Toddlers , Little Tikes™ Recalls Children's Toy Workshop Sets and Trucks Due to Choking Hazard

78. CHILDREN AND NOISE

79. Interview with American Speech-Language-Hearing Association, October 2021.

80. CHILDREN AND NOISE, page 20

81. Sight & Hearing Association Noisy Toys List ©

82. Elf Lab Baby Cell Phone Toy

83. Click N' Play Pretend Play Cell Phone TV Remote and Car Key Accessory Playset for Kids

84. Kicko Toy Gun

85. Noisy Toys

86. https://www.consumer.ftc.gov/articles/0031-protecting-your-childs-privacy-online

87. Children's messages in CloudPets data breach

88. Mario Kart Live: Home Circuit

89. Why can't I take videos or screenshots in Mario Kart Live: Home Circuit?

90. Singing Machine Kids Mood LED Glowing Bluetooth Sing-Along Speaker , Kids' karaoke machines and smart toys from Mattel and Vtech among those found to have security flaws – Which? News

91. Kids' karaoke machines and smart toys from Mattel and Vtech among those found to have security flaws – Which? News

92. Kids' karaoke machines and smart toys from Mattel and Vtech among those found to have security flaws – Which? News

93. https://www.amazon.com/s?k=bluetooth+karaoke+microphone&crid=3MU5HVVT15268&sprefix=bluetooth+karao%2Caps%2C178&ref=nb_sb_ss_ts-doa-p_1_15

94. Executive Summary Artificial Intelligence and Childrens Rights ,

95. 32nd Annual "Trouble in Toyland" Survey Finds Dangerous Toys on Store Shelves

96. German parents told to destroy Cayla dolls over hacking fears https://www.bundesnetzagentur.de/SharedDocs/Pressemitteilungen/EN/2017/17022017_cayla.html

97. https://www.google.com/url?q=https://www.bbc.com/news/technology-39115001&sa=D&source=editors&ust=1633552678799000&usg=AOvVaw2sqzAOvmIkr6OOtGFSocW2

98. https://www.cnet.com/tech/services-and-software/amazon-will-stop-selling-connected-toy-cloud-pets-filled-with-security-issues/

99. Cloud Pets App 12" Plush Bear, Amazon and eBay pull CloudPets smart toys from sale

100. Kids' karaoke machines and smart toys from Mattel and Vtech among those found to have security flaws – Which? News

101. Bloxels EDU

102. Mattel Bloxels Build Your Own Video Game (Discontinued by Manufacturer)

103. Electronic Toy Maker VTech Settles FTC Allegations That it Violated Children's Privacy Law and the FTC Act

104. Xbox Family Settings: Responsible Gaming for All, Nintendo Switch Parental Controls – Nintendo Switch™ Official Site – Parental controls, family gaming, Parental controls US

105. https://support.xbox.com/en-US/help/hardware-network/accessories/set-up-and-use-chat-headset

106. S5 Won't Require a Headset for Communication in Online Multiplayer

107. How to Voice Chat in Nintendo Switch Games