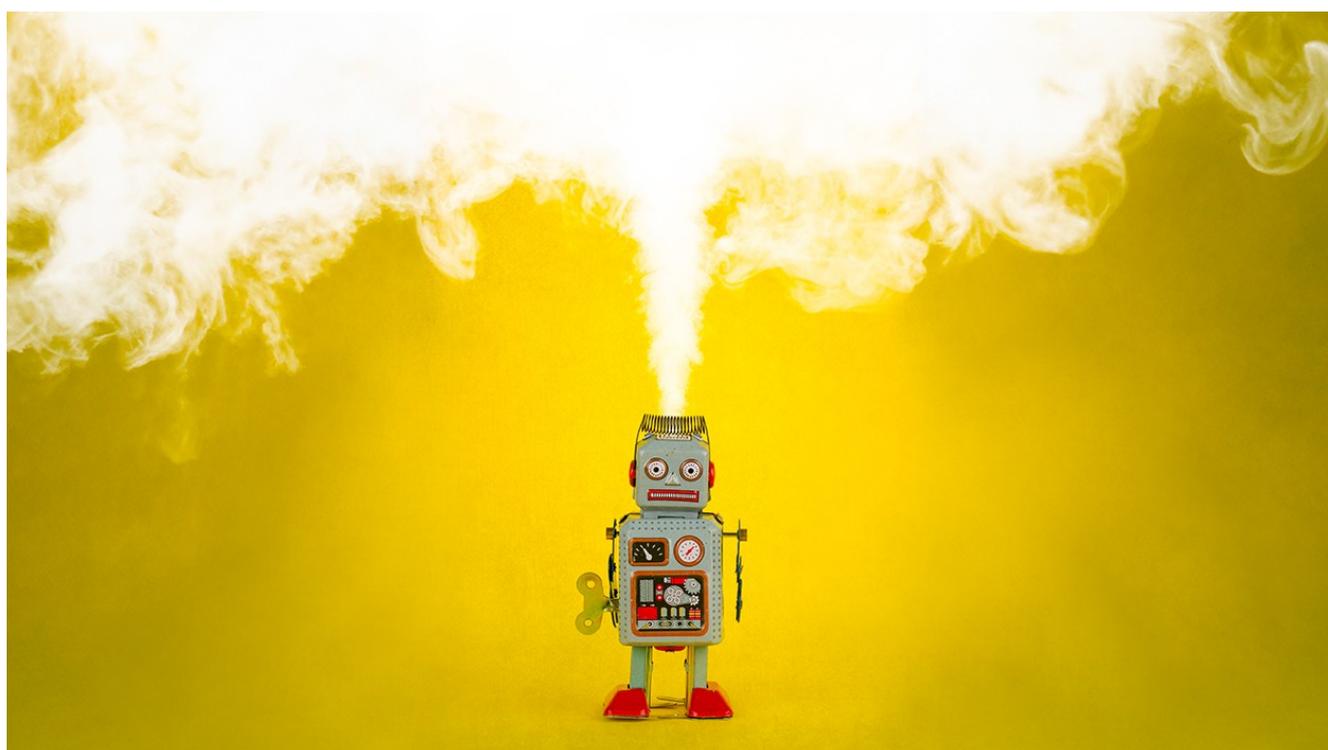


CHEATING THE TOY WORLD

Operation LUDUS (2020-2025): Findings on the distribution and dangers of counterfeit toys



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**CHEATING THE TOY WORLD**

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Key Findings

Operational results overview

Over its five editions, Operation LUDUS has revealed the extent of toy counterfeiting across the European Union, and shown that continuous law enforcement engagement is essential to tackle it:

- ▶ 27 612 law enforcement inspections carried out.
- ▶ Number of seizures (all editions): 45.6 million; equivalent to 760 000 seizures per month of operation confirming the alarming scale of the counterfeit toy market.
- ▶ Between 18 and 29 participating countries in consistent engagement and enforcement actions.
- ▶ Toys are continuously targeted because of their variety and popularity, with board games, dolls and school accessories amongst the top three categories.

Key trends observed

Operation LUDUS' results have confirmed that criminal networks operating in toy counterfeiting (their manufacture, promotion, distribution, etc.) continue to profit from high demand for low-priced goods, following general criminal trends in product counterfeiting:¹

- ▶ Counterfeiters often operate from outside the EU, which continues to challenge EU law enforcement efforts.
- ▶ As organised crime is increasingly nurtured online, so is intellectual property (IP) crime, with online commerce effectively influencing consumers' demand for low-priced goods. In particular, commerce via social media platforms has become a primary channel for counterfeiters to advertise illicit toys.
- ▶ The exploitation of digitalisation of society and technological innovations such as 3D printing and AI-driven marketing, continues to accelerate the trade of counterfeit toys.
- ▶ Social commerce and small parcel distribution continue to pose significant challenges to detection and traceability.

Introduction

Launched in 2020 as the first-ever international law enforcement action against counterfeit toysⁱ, Operation LUDUS has completed its fifth edition in 2025.

Operation LUDUS was initiated in recognition of the need for coordinated actions to target an illegal market whose vast scale and cross-border nature suggest organised crime involvement, and the abuse of legal business entities.²

The EU counterfeit toys market has grown to an alarming size and has a multifaceted impact, particularly on public health and the economy. Counterfeit toys often fail to meet EU safety standards, exposing children to many risks including choking hazard, exposure to toxic substances and unsafe mechanical propertiesⁱⁱ. Yearly lost revenues due to counterfeiting in the toys sector are estimated at around EUR 1 billion by EUIPO, corresponding to 8.7 % of all toys sales.³

The seizure of 5 million counterfeit toys during the LUDUS first edition (from October 2020 to January 2021) confirmed the magnitude of the problem and emphasized the need for coordinated enforcement. Building on intelligence-driven law enforcement actions and international public-private cooperation, Operation LUDUS has been renewed annually through 2025, reaching more than 45 million of counterfeited items dedicated to children's amusement seized by authorities.

Recent LUDUS editions have addressed the growing risk of counterfeit toys producers exploiting the digital realm and misusing emerging technologies, in line with the evolution and expansion of means and tools used by organised crime.⁴ E-commerce via social media platforms (referred to as 'social commerce') particularly drives both the demand and supply of counterfeit toys, while access to AI tools facilitates the forgery of labels and origin markings. This, as a result, undermines product traceability and interception along the production and retail line.⁵

This report provides an overview of the outcomes of the LUDUS iterations, running from 2020 to 2025. It is based on operational data contributed by participating countries to Europol and private sector information contributed to EUIPO. Open-source intelligence has also been used, where relevant, to contextualise some of the operational results.

ⁱ In this report, 'counterfeit toys' refer to illicit toys including subs-standard ones. Traditional toys and 'games' - i.e. electronic game consoles, video games, puzzles and 'others' - are concerned.

ⁱⁱ In 2022, toys were the most reported category in the EU Safety Gate (RAPEX), accounting for 23% of alerts. The main risks were choking (40%), dangerous chemicals (38%), environmental hazards (13%), and injuries (12%). The system enables rapid information exchange on dangerous products among Single Market authorities. More information on EU Safety Gate is available at <https://ec.europa.eu/safety-gate-alerts/screen/webReport>

Part I: Operational framework

As part of its mandate, Europol provides support to EU Member States investigations on Intellectual Property (IP) crime, including targeting criminal networks behind counterfeit market of toys and other products. The Intellectual Property Crime Coordinated Coalition (IPC³), within Europol’s European Economic and Financial Crime Centre (EFEC), leads this effort, supported by EUIPO and with the participation of other EU bodies.

An intelligence-led approach

IPC³ coordinates a number of targeted operations based on identified priorities and trends in IP crime, following an intelligence cycle: operational results feed the intelligence picture (e.g. identifying key risk factors based on identified crime dynamics), which in turn feed the targeting in following operational actions (e.g. targeting specific commodities in priority).

Operation LUDUS was built on this intelligence-based approach, with each annual edition having specific priorities, yet sharing the same key objectives.

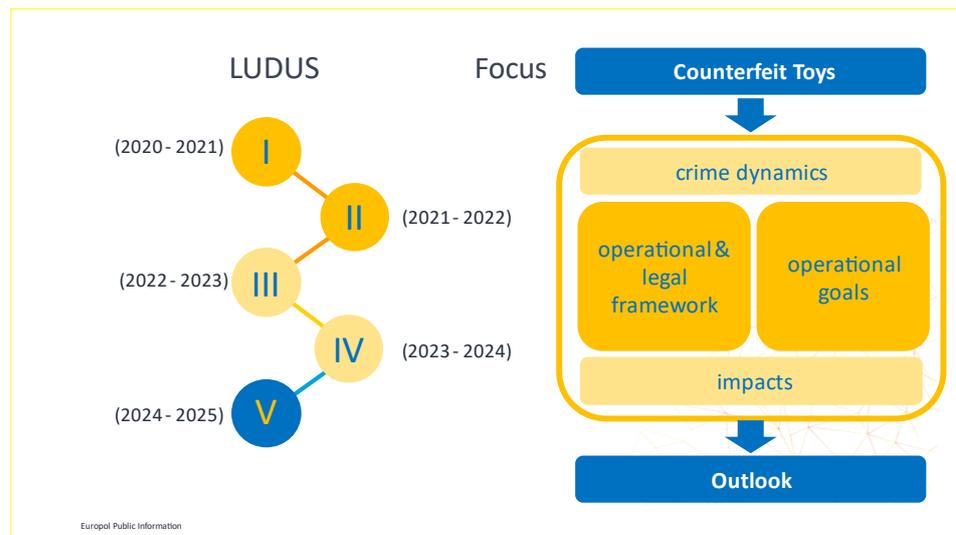


Figure 1. Intelligence-led operational approach

Common objectives

- **Protecting public health** by reducing children’s exposure to health and safety risks posed by counterfeit toys;
- **Disrupting criminal networks** involved in the trade of counterfeit toys;
- **Enhancing cooperation** in the fight against IP crime – both among competent authorities internationally (including police, customs and other consumer protection and regulatory agencies), and between authorities and private stakeholders within the toy industry.

Specific operational focuses of LUDUS editions (following LUDUS I):

- **LUDUS II** - Modus operandi and routes
- **LUDUS III** - Criminal actors exploiting AI to infiltrate the legal supply chain
- **LUDUS IV** - Distribution networks and misuse of online markets
- **LUDUS V** - Promoting spin-off investigations

During LUDUS II to IV, a targeted operational action was conducted against the counterfeiting of a specific branded product, as it was identified as spreading and posing toxicity risks.

A cooperative operational model

Operation LUDUS has consistently brought together competent authorities (police and customs) and relevant regulatory bodies from EU Member States and Third-party countries to implement operational actions, with the coordination of Europol, support of EUIPO, the European Anti-Fraud Office (OLAF), the World Customs Organisation (WCO), and private sector cooperation.

	Participating EU Member States	Participating Third-Party countries
LUDUS I	Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia, France, Greece, Hungary, Ireland, Italy, Latvia, Luxembourg, the Netherlands, Portugal, Romania, Slovakia, Slovenia, Spain (20)	Iceland, Denmark ⁱⁱⁱ , Norway, United Kingdom, United States (5)
LUDUS II	Belgium, Croatia, Czechia, Estonia, France, Germany, Greece, Hungary, Ireland, Italy, Romania, Slovakia, Spain (13)	Cote d'Ivoire, North Macedonia, United Kingdom and United States of America (4)
LUDUS III	Austria, Belgium, Bulgaria, Croatia, Czechia, France, Germany, Greece, Hungary, Italy, Latvia, the Netherlands, Poland, Portugal, Romania, Slovakia, Spain (17)	Argentina, Australia, Brazil, Cameroon, Chile, Colombia, Mexico, North Macedonia, Singapore, Thailand, Togo, United Kingdom (12)
LUDUS IV	Austria, Belgium, Bulgaria, Croatia, Czechia, France, Germany, Greece, Hungary, Italy, Latvia, the Netherlands, Poland, Portugal, Romania, Slovakia, Spain (17)	Albania, Colombia, North Macedonia, United Kingdom, United States (5)
LUDUS V	Austria, Belgium, Bulgaria, Czechia, Croatia, France, Hungary, Italy, Latvia, Lithuania, the Netherlands, Poland, Slovakia, Sweden, Romania (15)	Albania, Colombia, Serbia (3)

Figure 2. Countries engagement - 18 to 24 countries have responded to Europol's call to engage in Operation LUDUS annual editions

ⁱⁱⁱ Denmark, an EU Member State, participates as a Third Party (TP) in specific Europol initiatives due to its opt-out from EU police and judicial cooperation in criminal matters, as agreed in the Edinburgh Agreement of 1992.

Confronting this global and multifaceted threat requires sustained cooperation. Joint actions between Europol, customs authorities, national law enforcement agencies, EUIPO, and private-sector partners have led to targeted inspections, coordinated risk profiling, and timely intelligence exchanges. These concerted efforts have disrupted key supply routes, enabled simultaneous cross-border operations, and strengthened the EU's capacity to detect and seize counterfeit toys before they reach consumers.

Europol's coordination

Europol supported Member States investigations with operational coordination, strategic analysis, and intelligence exchange via its Secure Information Exchange Network Application (SIENA). This enables real-time sharing of risk indicators, data on seizures, and investigative leads, both within the EU and with trusted international partners.

Europol also ensured relevant consultations and continuous coordination with EUIPO and OLAF, as well as with WCO since LUDUS II.

WCO engagement following LUDUS I illustrated the intelligence-and-lessons-learned cycle (See Figure 1) on which this operation was based. LUDUS I highlighted the key importance of customs coordination, which has been supported by OLAF since the inception of LUDUS I.

Europol's long-standing partnership with EUIPO in the fight against IP crime was a cornerstone of the success of Operation LUDUS. EUIPO provides key expert knowledge on IP protection, supports the development of risk indicators, and contributes detailed brand-protection intelligence to operational planning. EUIPO's analytical insights and data, combined with Europol's operational reach, strengthened the targeting of high-risk shipments and the identification of emerging trends in counterfeit toy production and distribution.

Private Sector Cooperation

Private partners play a critical role by contributing product expertise, brand protection intelligence, and comparative analysis of counterfeit versus authentic goods. Their voluntary involvement across the various editions of Operation LUDUS led to improved targeting, detection, and seizure of counterfeit toys at EU borders and within the internal market.

This cooperation enhances operational effectiveness by:

- Providing intelligence and risk assessments on products during the pre-operational phase, as well as intelligence on global sellers.
- Supporting ongoing investigations at national level.
- Offering technical expertise where needed.

Due to their global footprint and market insight, private sector partners are essential in identifying emerging trends and international distribution routes. They often share intelligence related to activities outside the EU, filling critical information gaps for enforcement agencies and enabling more coordinated and informed operational responses.

Operational timeline

In line with the intelligence-based approach and cooperative operational model, each LUDUS edition was divided into three phases.



Figure 3. Operational phases

The operational phase of the LUDUS editions covered a period of about four consecutive months, strategically focused on the end-of-the-year festive season when sales typically peak^{iv}, and consumers and children alike, are most vulnerable to the potential risks of counterfeit toys.⁶

^{iv} Purchases peak prior to or during the actual event of Carnival, Halloween or Christmas.

Part II: Operational results

The vast scale of the counterfeit toy market consistently observed

Overall results: nearly 50 million toys seized overall

All participating countries carried out inspections and investigations at national level, focusing on the entire supply chain, with reported seizures at production sites, during the transportation phase, including the distribution and selling points. Participating law enforcement agencies carried out a variety of actions to disrupt distribution channels, including seizures during transportation, at border controls, on highways and targeted routes, as well as customs checks at the borders and inspections at open markets. Additionally, dedicated online operations and monitoring^v were conducted to target online sales.

As a result, Operation LUDUS led to the seizure of nearly 50 million of illicit toys, valued at nearly EUR 150 million (see details in Figure 4).

These figures confirm the alarming scale of the counterfeit toy market.

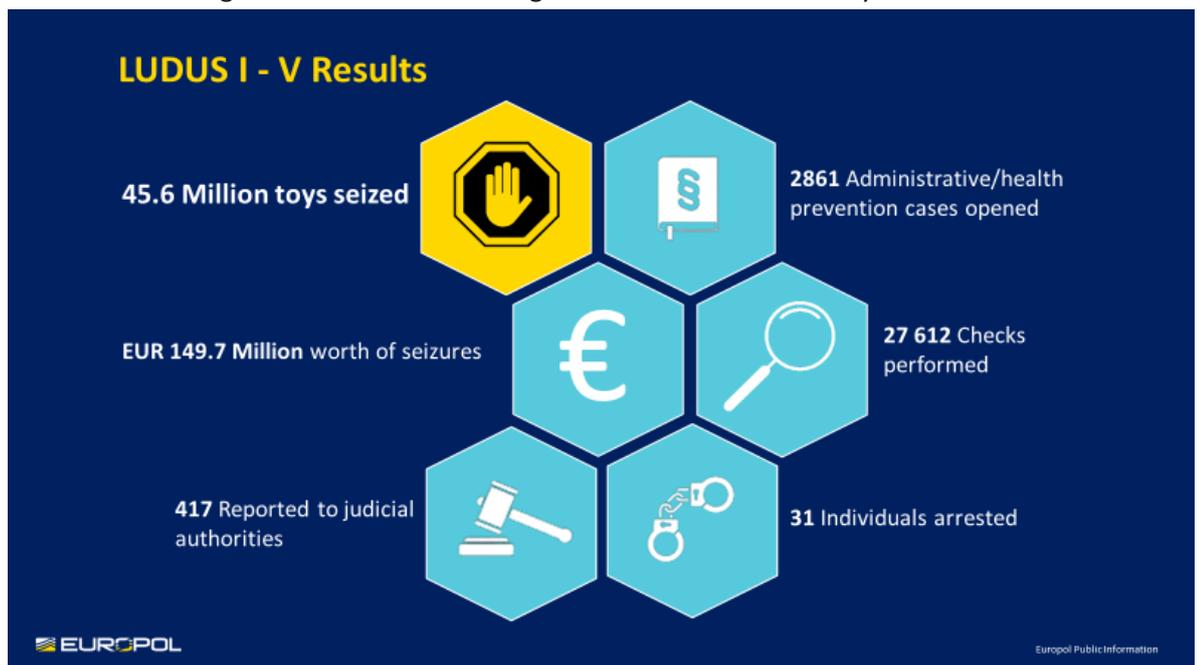


Figure 4. Overall operational results

They also suggest the high profit-low risk characteristic of such crime, considering the limited number of actual arrests during the operational phase.

Results evolution: a peak of seizures in 2022-2023

^v A more dedicated online operation relates to cyber patrols.

The number of toys seized and their original value has notably peaked in LUDUS III (2022-2023)^{vi}, with 19 million toys seized valued at EUR 79 million.

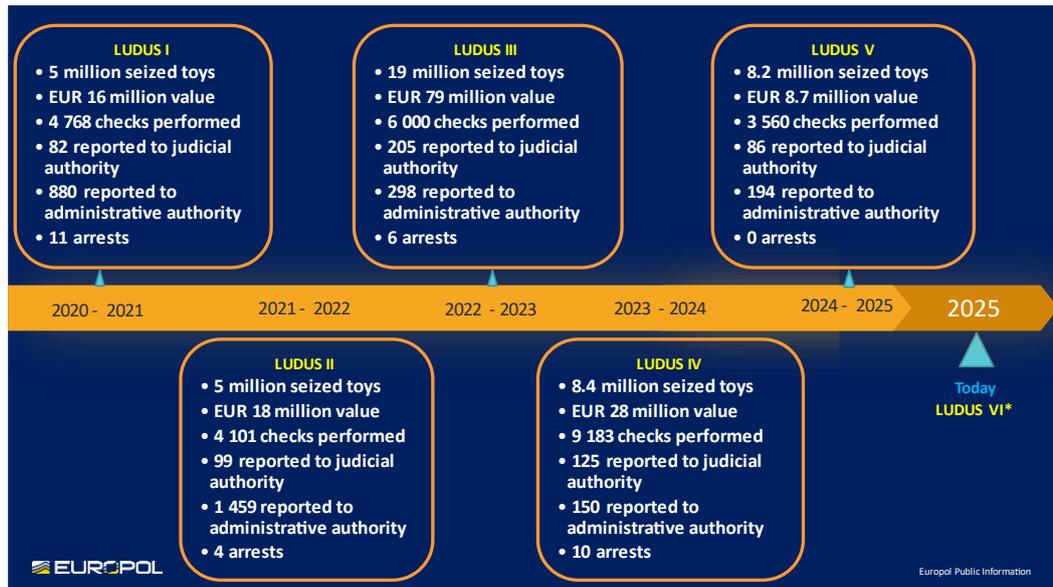


Figure 5. Operational results per edition

^{vi} This peak is observed both in absolute value and relative to the number of checks

LUDUS II: MORE THAN 5 MILLION POTENTIALLY DANGEROUS TOYS SEIZED IN 21 COUNTRIES⁷

LUDUS II, carried out between October 2021 and 31 January 2022, was led by the Spanish Civil Guard (Guardia Civil), Spanish National Police (Policia Nacional) and the Spanish Customs authorities (DAVA) and co-led by the Romanian Police, which involved law enforcement authorities from 21 countries in total. Specific operational highlights involved:

In the Lazio and Campania regions, the Italian Financial Corps (Guardia di Finanza) intercepted and seized a large amount of illegal puzzle games coming from an Asian country. The toys were stored in two warehouses.

Participating EU Member States: Belgium, Bulgaria, Croatia, Czechia, Estonia, France, Germany, Greece, Hungary, Italy, Latvia, the Netherlands, Portugal, Romania, Slovakia, Slovenia, Spain.

Third-party countries: Cote d’Ivoire, North Macedonia, United Kingdom and United States of America.



LUDUS III: 79 MILLION WORTH OF COUNTERFEIT TOYS SEIZED IN EUROPOL-COORDINATED OPERATION⁸

LUDUS III, between October 2022 and 28 February 2023, was led by the Spanish Civil Guard (Guardia Civil), Spanish National Police (Policia Nacional) and the Spanish Customs authorities (DAVA) and co-led by the Romanian Police, which involved law enforcement authorities from 30 countries in total.

Participating EU Member States: Austria, Belgium, Bulgaria, Croatia, Czechia, France, Germany, Greece, Hungary, Italy, Latvia, the Netherlands, Poland, Portugal, Romania, Slovakia, Spain.

Third-party countries: Argentina, Australia, Brazil, Cameroon, Chile, Colombia, Mexico, North Macedonia, Singapore, Thailand, Togo, United Kingdom.



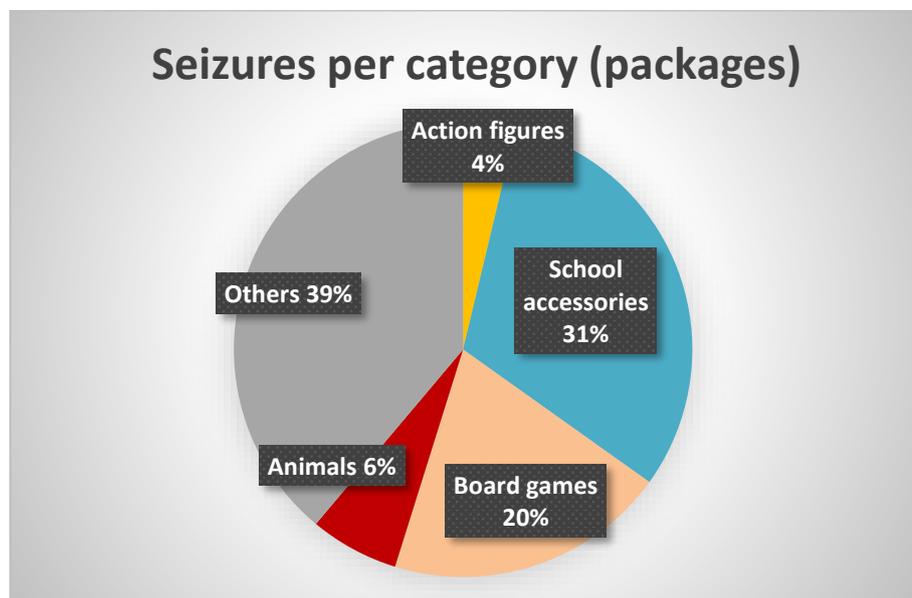
Characteristics of the criminal market observed

Types of toys seized

A large variety of toys was found during the various iterations of LUDUS; however card games, dolls, and action figures were identified as the most targeted goods by counterfeiters. Due to their increased demand during the festive periods, expensive branded toys and items featured in popular children’s television shows were a particular target.

Seized toys varied across the numerous LUDUS editions^{vii}, showing a significant shift to products diversification, possibly to avoid law enforcement identification and interception:

- During LUDUS I, the majority of seized toys were infant toys and dolls (60 %), highlighting that, criminal actors do not hesitate to target the most vulnerable demographics.⁹
- During LUDUS V, school accessories and board games consistently ranked among the top three counterfeit products seized, both in terms of quantity and value (see Figure 6). Yet, unspecified toy types that do not fall into predefined categories, corresponded to the majority of seizures, reflecting the diversity of counterfeit toys produced and introduced into the market (labelled as “others” in Figure 6).



^{vii} This variation can be partly explained by evolving operational targets.

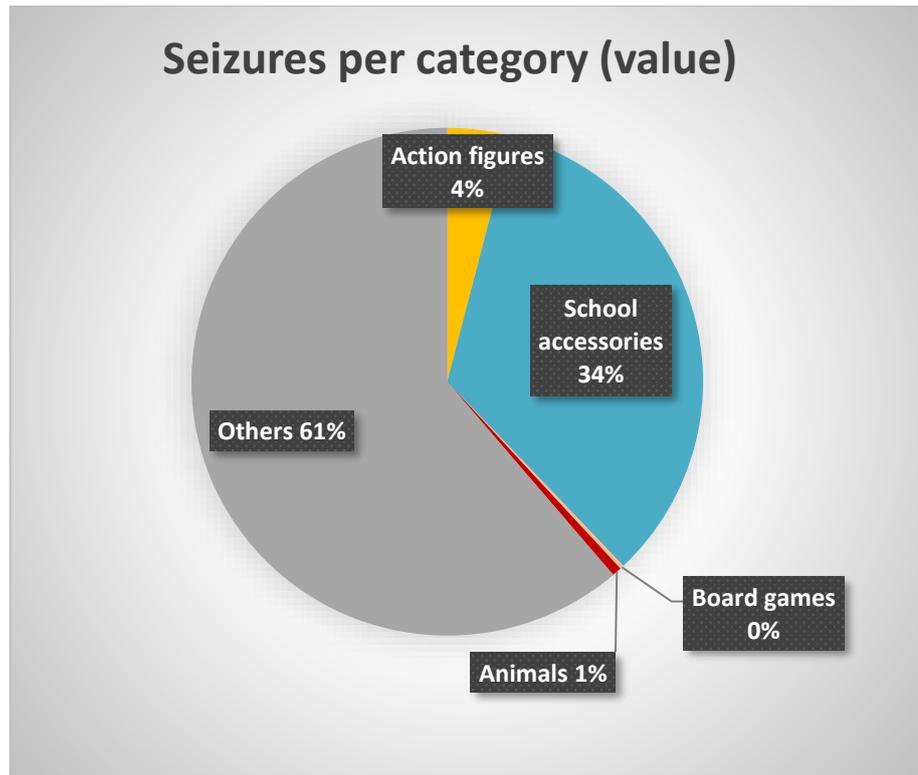


Figure 6. LUDUS V toys seizure per category (in packages number and estimated value)

Types of offence

Offence types have remained consistent across all LUDUS operations. The vast majority of the toys seized were associated with health hazards, and failed to display or contain the mandatory labelling. The absence or misinformation related to CE markings, electrical safety labels, warning signs, and safety instructions increase the potential risks and dangers to consumers.

Incorrect spelling and multiple bar codes are additional evidence of counterfeit labelling. Insufficient product information or inadequate packaging also serve as indicators to identify potentially illicit toys.

Device hazards associated with the seized toys included:

- Long cords, ribbons and drawstrings that carry a risk of strangulation;
- Low quality batteries (sold cheaper than the market price) that carry a risk of burning hazard;
- Insufficient quality materials that can easily break off or cause injuries; and
- Small detachable parts that can be swallowed, such as small magnets.

Origins and trafficking routes

China remains the main origin country of counterfeit toys marketed in the EU. The illegal importation of finished products ready to be sold remains the key challenge, however, intra-EU clandestine assembly sites are on the rise. Non-EU companies introducing counterfeit toys into the EU often split large shipments into smaller ones to evade detection. This way, customs officers could detect only a few hundred illegal packages in each container. The LUDUS operation also revealed that larger shipments of toys could be used to conceal other kinds of illicit goods (especially drugs).¹⁰ Furthermore, countries such as Bulgaria, Greece and Türkiye were being used as transit routes for transporting counterfeit toys.

Criminal networks and process

While most counterfeit toys traded within the EU originate from outside the Union, detecting the criminal networks and actors involved remains challenging.

Specific investigations initiated within LUDUS framework confirmed the general trends regarding criminal networks active in product counterfeiting:¹¹ EU-based criminal networks are playing a growing role in the importation and distribution of counterfeit toys, as they are often involved in the manufacturing and assembly of other counterfeit commodities.¹² They typically operate in flexible, networked structures that mirror legitimate business models, in cooperation with partners both inside and outside the EU.¹³

Distribution channels for counterfeit toys are diverse, including air, sea and land routes. The logistics sector is a prime target for criminal networks' infiltration.

Sea cargo, however, remains a predominant mode of transport for counterfeit goods including toys, as evidenced by the large number of reported seizures at maritime borders. This activity is often supported by crime enablers such as falsified documents or invoices. Customs declarations are frequently manipulated to misrepresent the type of goods or their origin, while leased

commercial warehouses are used to store counterfeit toys safely before distribution.¹⁴

The use of postal and courier services significantly accelerated during the COVID-19 pandemic, as a preferred method for distribution directly to customers. A massive influx of substandard goods from non-EU web shops continues to challenge law enforcement detection. With 12 million small e-commerce packages arriving in the EU daily, the use of AI could be soon used to assist law enforcement and market surveillance authorities.¹⁵

Outlook - Challenges and implementing effective practices

All editions of Operation LUDUS have yielded effective results despite persistent challenges in detecting counterfeit toys. Europol, working closely with its stakeholders, has identified key requirements and best practices to address these challenges, protect the integrity of the toy market, and mitigate associated health and safety risks.

Operation LUDUS applied targeted risk indicators and conducted detailed threat assessments to improve container inspection and increase detection rates. However, since most counterfeit toys originate from a limited number of export countries, there is a need for more specific, adaptive, and data-driven risk indicators to better target high-risk shipments.

In certain cases, physical inspection and laboratory testing are essential to confirm product defects, often with the support of brand owners. Strengthening collaboration with the private sector remains a priority – especially in response to new and evolving trends such as AI. Such collaboration provides timely access to product data, facilitates verification of security features, and offers valuable insights into online and social media trends.

Ultimately, consumer demand is a decisive factor in the counterfeit toy trade. Raising public awareness of the safety hazards and the links to broader criminal activity remains essential in reducing demand and preventing harm. Furthermore, ongoing monitoring of emerging trends, criminal activity and online marketplaces continues to strengthen law enforcement efforts.

In this regard, Europol is reviewing its strategies and operational approach in alignment with the European Union Serious Organised Crime Threat Assessment (EU-SOCTA 2025)^{viii}. A key priority moving forward is to integrate Operation LUDUS within a broader umbrella of complementary enforcement initiatives. Building on the outcomes and expertise generated through Operation LUDUS, further efforts will be aligned within a broader framework of complementary enforcement initiatives to strengthen coordination, maximize impact, and sustain the fight against IP crime.

This strategic shift aims to streamline currently autonomous operations under a unified and more coordinated framework. By adopting a holistic and cross-cutting approach to IP crime—particularly targeting counterfeit goods—this integration will enhance operational impact, improve resource allocation, and strengthen cross-sectoral intelligence sharing. It reflects the evolving threat landscape and ensures that future actions address not only product-specific risks but also broader patterns of organised criminal activity.

^{viii} The European Union Serious Organised Crime Threat Assessment (EU SOCTA) is Europol's flagship report that updates the law enforcement community and decision makers on developments in serious and organised crime and on the threats it poses to the EU. It is accessible at: <https://www.europol.europa.eu/publications-events/main-reports/socta-report>

Way forward

At EU level, law enforcement investigations will continue to tackle the dangerous trade in counterfeit toys and the criminal actors behind it.

Stronger IP protection efforts are still needed, particularly with a focus on known criminal hotspots. These locations, often serving as hubs for production and distribution of counterfeit goods, require greater focus by law enforcement and judicial action due to their critical role in the supply chain of illicit goods. Besides, right-holders and the private sector play a vital role in supporting enforcement actions and protecting consumers.

Law enforcement agencies, judicial authorities, governments, and industry actors may adapt their methods by adopting automated tools to facilitate the detection of counterfeit goods – whether online, particularly through social media and e-commerce platforms, or at border control points.

Parallel financial investigations and asset recovery efforts are necessary to target the criminal proceeds and dismantle the financial infrastructure of counterfeiting networks. Several Member States reported launching asset tracing and financial disruption activities alongside seizures of counterfeit toys. These complementary measures aim to dismantle the business model of IP crime networks, not just their output.¹⁶

Education and awareness raising about the serious impact of IP crime and the risks it poses to consumer health and safety should remain a core priority¹⁷ and all stakeholders should play a role in prevention.

Sustained operational activity, targeted monitoring and effective intelligence sharing among stakeholders remain essential in preventing and detecting IP crime.¹⁸ EU authorities reaffirm their commitment to a unified,

intelligence-led approach that disrupts counterfeit supply chains, protects consumers, and safeguards legitimate industry, in line with the objectives of the 2026-2029 EMPACT cycle. This coordinated approach will continue to allow EU law enforcement and key stakeholders to share intelligence, prioritise operational targets, and respond to emerging threats.

Beware of Fakes!!

Buying from renowned retailers provides accountability and warranty.

Annex: The legal framework

The EU Toy Safety Directive (2009/48/EC) defines a ‘toy’ as any product designed or intended, whether exclusively or not, for use in play by children under 14 years of age.¹⁹ Defective or non-compliant toys may pose serious safety risks; however, they do not necessarily qualify as ‘counterfeit’ as such notion involves unauthorised use of a brand or IP.

In 2023, The European Commission proposed replacing the Directive with a new Toy Safety Regulation, aiming to strengthen protection against harmful chemicals and enhancing enforcement measures. A key feature of the proposal is the introduction of a Digital Product Passport^{ix}, to store essential product information in a standardised, accessible format. This will enable market surveillance authorities to quickly verify safety and compliance data, improving the detection of unsafe or non-compliant toys and streamlining enforcement actions.

The EU Digital Service Act, adopted in 2022²⁰, aims to enhance transparency and accountability in digital services, including online platforms, search engines, hosting services and intermediary services. It mandates online marketplaces to improve ‘know-your-customer’ practices and introduces trusted flaggers for counterfeit goods, enhancing brand and consumer protection.²¹

IP crime scope and sanctions vary across EU Member States and most countries consider it a serious crime and set maximum prison terms exceeding four years of imprisonment.²²

In March 2024, the European Commission issued a recommendation urging Member States to review and align their national criminal provisions regarding trademark counterfeiting and copyright piracy with the principles of proportionality and deterrence.²³

By combining strengthened product safety legislation, digital transparency tools such as the Digital Product Passport, and stricter enforcement measures under the Digital Service Act, the EU is building a more coherent and robust framework to protect consumers—particularly children—from unsafe and counterfeit toys.

^{ix} Manufacturers must provide, via data carrier, a product passport indicating: toy information, conformity to the Toy Safety Regulation requirements, customs tariff number, CE marking, EU legislation, substances of concern, and fragrances. The product passport will be kept in a centralised register at the European Commission for ten years after the toy is placed on the market to ensure direct access to market surveillance authorities, customs authorities, and other economic operators. Source: European Commission, (2025), New Rules for safer toys in the EU, accessible at https://ec.europa.eu/commission/presscorner/detail/en/ip_25_1039

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²¹ European Commission, The Digital Services Act, accessible at https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/digital-services-act_en

²² EUIPO, 2024, Legislative measures related to intellectual property infringements – Phase 3, accessible at <https://www.euipo.europa.eu/en/publications/legislative-measures-related-to-intellectual-property-infringements-phase-3>

²³ European Commission, Commission recommendation of 19 March 2024 on measures to combat counterfeiting and enhance the enforcement of intellectual property rights, accessible at https://single-market-economy.ec.europa.eu/publications/commission-recommendation-measures-combat-counterfeiting-and-enhance-enforcement-intellectual_en