



Inspiring Generations of Play

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September 16, 2020

**Department for Digital, Culture, Media, and Sport (DCMS)**

**Via: Trade Policy Group**

**Department for International Trade**

**3 Whitehall Place**

**London**

**SW1A 2AQ**

**Via TBT Enquiry Point**

**Re: Comments of The Toy Association and North American Toy Industry Regarding the proposed UK Cybersecurity Guidelines for Connected Consumer Devices; G/TBT/N/GBR/36**

Dear Sir or Madam:

I hope that this letter finds you and your colleagues well during this time of global pandemic. I am writing to express the comments of the Toy Association and the U.S. and Canadian toy industries regarding the proposed UK Cybersecurity Guidelines for Connected Consumer Devices, notified as WTO TBT notification **G/TBT/N/GBR/36**.

The Toy Association and its 1,000+ members stand committed to ensuring that only the safest and most secure products reach children, our most vulnerable consumers. In this light, we welcome the recent circulation of the Draft UK Cybersecurity Guidelines for Connected Consumer Devices. We support workable guidelines to assure the security of connected devices and appreciate the request for input from affected stakeholders.

The Toy Association recognizes The Government of the United Kingdom's objective to ensure that items such as connected toys sold in the UK are subject to protective standards for safety, and that cybersecurity is one element of this assurance; The Toy Association shares these same goals. Safety is the top priority for The Toy Association and our members, and we have been global leaders in toy safety for decades. The Toy Association continually works with medical and child development experts, governments, consumers, testing labs and industry to ensure that safety standards are appropriately protective of children and families at play, and treated

as “living documents” in order to keep pace with innovation, changing technologies, and potential emerging issues.

With this in mind, we do have some comments regarding the draft rules, and request that you take these into account as the draft moves forward in the development process.

1. *To start, we wish to make you aware of a document, ASTM F3463-2020, Standard Guide for Ensuring the Safety of Consumer Connected Products, which is expected to be published in the next few months. The standard is intended to be used as guidance for manufacturers of connected consumer products to help ensure the physical safety of users of those products, as it relates to their connected functionality. The guidance has been developed as a consensus standard under the auspices of ASTM International, a global standards developer which has published standards that cover many industry sectors including consumer products.*

*The draft standard guide is specific to connected consumer products or Consumer Internet of Things (IoT), and covers connected products such as children’s toys, safety-related products such as smoke alarms and door locks, TVs and speakers, wearable health trackers and smart apparel, home automation, security or surveillance cameras and alarm systems, appliances (e.g. washing machines and refrigerators), smart home assistants, baby monitors, and other connected consumer products.*

*We recommend that DCMS review this document and we urge you to consider alignment with its principles, developed by a diverse group of stakeholders and experts. This guideline presents an approach that focuses on the key goals of cybersecurity and the safety of connected products in a way that is flexible, while allowing for and encompassing evolving advances in technology. This approach is protective yet less prescriptive and therefore more likely to remain relevant with such future technologies.*

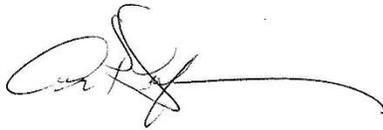
2. *Specific to the UK Cybersecurity Guidelines, we are concerned regarding what we perceive as a proposed prohibition on default passwords. While we do understand this can be problematic if proper safeguards are not in place, we believe a mandatory setup step for the device, requiring the consumer to change the default to a unique password of minimum complexity, would safeguard the security of the device equally well as such other approaches.*
3. *While the UK document is proposed as guidelines, we are concerned that they may be implemented at some future point as mandatory, thus it is critical that it be written in such a way as to provide maximum flexibility.*

4. *Toy Association members are keen to work with DCMS to shape the current draft to be more agile, less burdensome, less prescriptive (lest it become obsolete as technology advances), and successfully implementable for the mutual benefit of consumers and all stakeholders.*

We appreciate the opportunity to provide these comments and the Government's willingness to consider this input. Please do not hesitate to contact me if you should have questions or would like further information from me. I can be reached at [akaufman@toyassociation.org](mailto:akaufman@toyassociation.org).

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alan P. Kaufman', with a long horizontal flourish extending to the right.

Alan P. Kaufman  
Senior Vice President, Technical Affairs

*The Toy Association is a not-for-profit trade association; our members include North American-based manufacturers, importers, retailers, toy inventors, designers, and testing laboratories – all working toward bringing safe and fun toys to market.*