




How to Read a Test Report

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Agenda




- CPSC's Reasonable Testing Program
- Test Reports
- Certification
- Recordkeeping




Testing and Labeling Pertaining to Product Certification 


- Codified in 16 CFR 1107
- Effective Date: February 8, 2013
- Certification of Children's Products
 - 1107.20 – General Requirements
 - 1107.21 – Periodic Testing
 - 1107.23 – Material Change
 - 1107.24 – Undue Influence
 - 1107.26 – Recordkeeping
- Consumer Product Labeling Program (1107.30)




General Requirements – Certification Testing 

- Third party testing by CPSC approved lab is mandatory on all children's products to support Certification
- Manufacturers must submit a sufficient number of samples for testing. Number of samples must be sufficient to provide a "high degree of assurance" that the tests accurately demonstrate the ability of the product to meet all applicable safety rules
- Corrective Action Plan: If sample fails Certification testing, manufacturer must investigate reasons for failure and take necessary steps to address the reasons for failure




Periodic Testing 

- Must be performed by CPSC approved third party lab at appropriate testing intervals
- Manufacturers must develop a Periodic Testing Plan to ensure "high degree of assurance" in continued compliance. Periodic Testing Plan must include:
 - Tests to be conducted
 - Intervals at which the tests will be conducted
 - Number of samples tested
- At a minimum – Certification testing must be performed **Once a year**... with certain exceptions:
 - Material Changes require more frequent testing
 - Certification testing may be performed at least once every 2 years if manufacturer implements a Production Testing Plan
 - Certification testing may be performed at least once every 3 years if Production Testing Plan includes testing by ISO17025 lab




Production Testing Plan

- Production management techniques and tests performed to provide a "high degree of assurance" in continued compliance.
- May include:
 - Recurring testing (must include some testing)
 - Use of process management techniques
 - Control charts
 - Statistical process control programs
 - Failure modes and effects analyses (FMEAs)
- Documentation must include:
 - Description of the Production Testing Plan
 - Specific to each manufacturing site and each children's product
 - Production testing intervals must provide "high degree of assurance"



Material Change


- Any change in product's **design, manufacturing process, or sourcing of component parts** that could affect the product's ability to comply with applicable rules, bans, standards, or regulations
- Requires additional Certification testing in order to certify compliance of the 'new' product
- Testing dependent on the material change




Undue Influence

Each manufacturer must establish procedures to safeguard against the exercise of undue influence by manufacturer on a third party lab.

- Written policy statement from company officials that the exercise of undue influence is not acceptable
- Every appropriate staff member must receive training on avoiding undue influence and sign a statement attesting to participation in the training
- Retraining is required for any substantive changes
- Notify the CPSC immediately of any attempt by the manufacturer to hide or exert undue influence over test results
- Inform employees that allegations of undue influence may be reported confidentially to the CPSC, and how such a report can be made




Recordkeeping 

Manufacturer must maintain the following records:

- Copy of Children's Product Certificate for each product
- Records of each third party certification test
 - Separate CPC's and test records required for each manufacturing site
- Records of appropriate periodic tests
 - Periodic test plan and periodic test results
 - Production testing plan, production test results, periodic test results
 - Testing results of tests conducted by ISO 17025 testing lab and periodic test results
- Descriptions of all material changes, and the Certification tests related to these changes
- Records of undue influence procedures, including training materials and training records/attestations

Records must be maintained for 5 years, and made available to CPSC upon request.

Records may be maintained in languages other than English if they can be provided immediately to CPSC and translated accurately into English by manufacturer within 48 hours of a request




Consumer Product Labeling Program 

MEETS CPSC SAFETY REQUIREMENTS


- Label must be visible and legible
- Product must comply with all applicable rules, bans, standards and regulations enforced by the CPSC
- Additional labels may be added - Verbiage must not imply that the CPSC has tested, approved, or endorsed the product




Recordkeeping 


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Test Reports 

Important components include:

- Test laboratory name and address
- Supplier or factory name and contact information
- Test report date
- Product description
- Tests performed
- Actual test results
- Components tested
- Product photo






Test Reports 


TEST REPORT

Client Name: ABC Company Test Report No.: XXXXXXXX
 Address: 100 Main Street Enfield, CT 06082 Date: July 17, 2014
 Attn: John Smith
 Sample Description: Pink and Blue Silicone Wrist Bands with White Justin Bieber Logo, Style Numbers P12345 and B6789
 Tracking Label: EFG06202014
 Buyer: ABC Company
 Vendor: EFG Enterprises
 Labeled Age Grading: 3+ Years
 Tested Age Grading: 3+ Years
 Country of Origin: China
 Exported To: U.S.A
 Samples Received: 12 piece(s) of finished products received on Jul 09, 2014
 Date(s) of test(s) conducted: July 11-17, 2014
 Test Performed: Please refer to next page(s)

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Usually lab disclaimer and lab address will be here.



Test Reports 


TEST REPORT


Client Name: ABC Company **Test Report No.:** XXXXXXX
Address: 100 Main Street Enfield, CT 06082 **Date:** July 17, 2014

Conclusion:
16 CFR Part 1500.44 Flammability of Solids PASS
Sec. 101 of CPSIA Total Lead Content in Children's Products 100 ppm PASS
16 CFR Part 1303, Ban of Lead-Containing Paint 90 ppm PASS

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Usually lab disclaimer and lab address will be here.



Test Reports 


TEST REPORT


Client Name: ABC Company **Test Report No.:** XXXXXXX
Address: 100 Main Street Enfield, CT 06082 **Date:** July 17, 2014

Test Results:
Flammability Test to 16 CFR 1500.44 defined under 16 CFR 1500.3 section (c) (6) (vi)
Sample size: 1 piece(s) of each style(s)
Requirement: Burning rate should not exceed 0.1 inch per second along the major axis.
Results: The submitted samples ignited but extinguished.

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Usually lab disclaimer and lab address will be here.



Test Reports 

TEST REPORT

Client Name: ABC Company **Test Report No.:** XXXXXXX
Address: 100 Main Street Enfield, CT 06082 **Date:** July 17, 2014

Test Results:

Sec. 101 of CPSIA Total Lead Content in Children's Products 100 ppm per CPSC-CH-E1002-08.3


Component	Total Lead Result
Pink Silicone	N.D.
Blue Silicone	N.D.


16 CFR Part 1303, Ban of Lead-Containing Paint 90 ppm per CPSC-CH-E1003-09.1

Component	Total Lead Result
White Ink	15 ppm

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Usually lab disclaimer and lab address will be here.




Test Reports 

TEST REPORT


Client Name: ABC Company **Test Report No.:** XXXXXXX
Address: 100 Main Street Enfield, CT 06082 **Date:** July 17, 2014


Product Photo:



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Usually lab disclaimer and lab address will be here.

PPAI PRODUCT SAFETY 

Test Reports 


TEST REPORT


Client Name: ABC Company **Test Report No.:** XXXXXXX
Address: 100 Main Street Enfield, CT 06082 **Date:** July 17, 2014

Lab Terms & Conditions


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Usually lab disclaimer and lab address will be here.

PPAI PRODUCT SAFETY 

Best Practices – Test Reports 


- Ask for an actual copy of the test report
- Compare the test report to the certificate – they should match
- Test report is dated within one year
- Testing was done by an independent third party lab
 - Must be CPSC-approved if children's product
- Specific to your product – look at the product description and photo
- Make sure all of the product components have been tested
- Make sure all regulations are covered
- Look for the actual test result

PPAI PRODUCT SAFETY 


Certification 


- **Children's Product Certificate (CPC):** Manufacturers and importers of children's products certify based on test results from a CPSC-accepted laboratory, that their children's products comply with applicable children's product safety rules
- **General Conformity Certificate (GCC):** Manufacturers and importers certify that its non-children's (general use) product complies with all applicable consumer product safety rules (or similar rules, bans, standards, or regulations under any law enforced by the Commission for that product)




Responsibility 


- The importer for products manufactured overseas and the US manufacturer for products manufactured domestically
- Based on a test of each product or a reasonable testing program
- Must "accompany" the applicable product or shipment of products covered by the certificate
- Must "furnish" the certificate to your distributors or retailers
- Provide a copy of the certificate to the CPSC and to the Commissioner of Customs upon request




Elements Required in a GCC 


- **Identification of the product covered by this certificate:** Describe the product(s) covered by this certification in enough detail to match the certificate to each product it covers and no others.
- **Citation to each consumer product safety regulation to which this product is being certified:** The certificate must identify separately each consumer product safety rule administered by the Commission that is applicable to the product.
- **Identification of the U.S. importer or domestic manufacturer certifying compliance of the product:** Provide the name, full mailing address, and telephone number of the importer or U.S. domestic manufacturer certifying the product.
- **Contact information for the individual maintaining records of test results:** Provide the name, full mailing address, e-mail address, and telephone number of the person maintaining test records in support of the certification.
- **Date and place where this product was manufactured:** For the date(s) when the product was manufactured, provide at least the month and year. For the place of manufacture provide at least the city (or administrative region) and country where the product was manufactured or finally assembled. If the same manufacturer operates more than one location in the same city, provide the street address of the factory.
- **Provide the date(s) and place when the product was tested for compliance with the consumer product safety rule(s) cited above:** Provide the location(s) of the testing and the date(s) of the test(s) or test report(s) on which certification is being based.
- **Identification of any third party laboratory on whose testing the certificate depends:** Generally, this section should be labeled "N/A" for a GCC because third party laboratory testing is not a requirement for non-children's products. (It is only a requirement for children's products and must be included in a CPC.) However, if a certifier voluntarily uses test results from a third party laboratory as the basis for issuing its GCC, the law requires that the certifier must then provide the name, full mailing address, and telephone number of the third party laboratory.



Elements Required in a CPC 

- **Identification of the product covered by this certificate:** Describe the product(s) covered by this certification in enough detail to match the certificate to each product it covers and no others.
- **Citation to each CPSC children's product safety rule to which this product is being certified:** The certificate must identify separately each children's product safety rule that is applicable to the children's product.
- **Identification of the U.S. importer or domestic manufacturer certifying compliance of the product:** Provide the name, full mailing address, and telephone number of the importer or U.S. domestic manufacturer certifying the product.
- **Contact information for the individual maintaining records of test results:** Provide the name, full mailing address, e-mail address, and telephone number of the person maintaining test records in support of the certification.
- **Date and place where this product was manufactured:** For the date(s) when the product was manufactured, provide at least the month and year. For the place of manufacture, provide at least the city (or administrative region), state (if applicable), and country where the product was manufactured or finally assembled. If the same manufacturer operates more than one location in the same city, provide the street address of the factory.
- **Provide the date(s) and place when the product was tested for compliance with the consumer product safety rule(s) cited above:** Provide the location(s) of the testing and the date(s) of the test(s) or test report(s) on which certification is being based.
- **Identify any third party, CPSC-accepted laboratory on whose testing the certificate depends:** Provide the name, full mailing address, and telephone number of the laboratory.



Children's Product Certificate (CPC) Example 

Children's Product Certificate (Available at www.abccompany.com)

Identification of the product covered by this certificate:
Pink and Blue Silicone Wrist Bands with White Justin Bieber Logo, Style Numbers P12345 and B6789

Citation to each CPSC product safety regulation to which this product is being certified:
16 CFR Part 1500.44 Flammability of Solids
Sec. 101 of CPSIA Total Lead Content in Children's Products 100 ppm
16 CFR Part 1303, Ban of Lead-Containing Paint 90 ppm


Identification of the U.S. importer or domestic manufacturer certifying compliance of the product:
ABC Company | 100 Main Street | Enfield, CT 0682


Contact information for the individual maintaining records of test results:
John Smith, Compliance Manager
ABC Company | 100 Main Street | Enfield, CT 0682
(860) 222-6600
John@abccompany.com

Date and place where this product was manufactured:
June 20, 2014 | Shanghai, P.R. China


Date and place where this product was tested for compliance with the regulation(s) cited above:
July 17, 2014 | Shanghai, P.R. China

Identify the third party, CPSC-accepted where this product was tested by an accredited laboratory (accepted by the CPSC) for compliance with the regulation(s) cited above:
Testing Quality Labs
Floor 1 Building 1 Shanghai Rd
Shanghai 200135 P.R. China
(8621) 23248242



Best Practices - Certificates 

- Ask for an actual copy of the test report to back up the certificate
- Compare the test report to the certificate – they should match
- Certificate is dated within one year
- Based on testing by an independent third party lab
 - Must be CPSC-approved if children's product
- Specific to your product – should be a specific product, not a generic product or product line
- Make sure all regulations are covered



Product Safety Resources 

- PPAI: www.ppai.org
- Product Safety powered by PPAI:
<http://www.ppai.org/inside-ppai/product-safety/>
<https://www.ppai.org/inside-ppai/ppai-code-of-conduct/>
- Consumer Product Safety Commission: www.cpsc.gov; www.recalls.gov
- American National Standards Institute: www.ansi.org or www.astm.org
- UL: www.UL.com or Haley.Sprague@ul.com
- Questions? AnneL@ppai.org