



Regulated Product Testing and Certification

U.S. Consumer Product Safety Commission
Office of Hazard Identification & Reduction

March 2010

**These comments are those of CPSC staff, have not been reviewed
or approved by, and may not necessarily reflect the views of, the Commission.**



Regulated Product Testing and Certification

- Types of Certifications
- Reasonable Testing Programs
- Third Party Testing
- Material Changes
- Periodic Testing
- Testing Frequency
- Components





Consumer Product Safety Improvement Act

- Requires certification of regulated products
 - Consumer products
 - Children's products
- Certification based on product testing
 - Reasonable test program
 - Third-party testing of children's products





Certification of Regulated Consumer Products

- Regulated consumer products other than children's products
- General Certification of Conformity
- Required of importers and domestic manufacturers
- Must accompany each shipment
- Based on a test of each product or a reasonable testing program





Reasonable Testing Program

- Non-children's products
- Does not replace existing testing programs
- Provides a high degree of assurance that all product is compliant
- Should contain, at a minimum:
 - Product specifications
 - Applicable certification tests
 - Production testing
 - Remedial action plan
 - Program design and implementation documentation



Certification of Regulated Children's Products

- Regulated children's products
- Required of importers and domestic manufacturers
- Must accompany each shipment
- Based on testing performed by a CPSC recognized third party testing laboratory





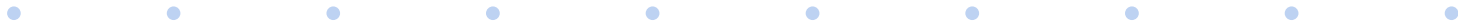
Third-Party Testing of Children's Products

- Event-triggered testing
 - Material change in:
 - manufacturing process
 - sourcing of materials
 - product design
- Periodic testing
 - Frequency
 - Sampling Plan
 - Random sampling
 - Sample size



Factors for Consideration – Periodic Testing

- Severity of injury linked to a non-conformance
- Production volume
- High variability in applicable test results
- Test results close to applicable performance limit
- Product complexity and uniqueness
- Hidden hazard
- History of incident reports, warranty claims, or returns





Third-Party Testing of Children's Products

- Special Consideration
 - Small production volumes
 - Custom “one-of-a-kind” products
 - Component part testing
- Manufacturer's Responsibility





Third-Party Testing Laboratories

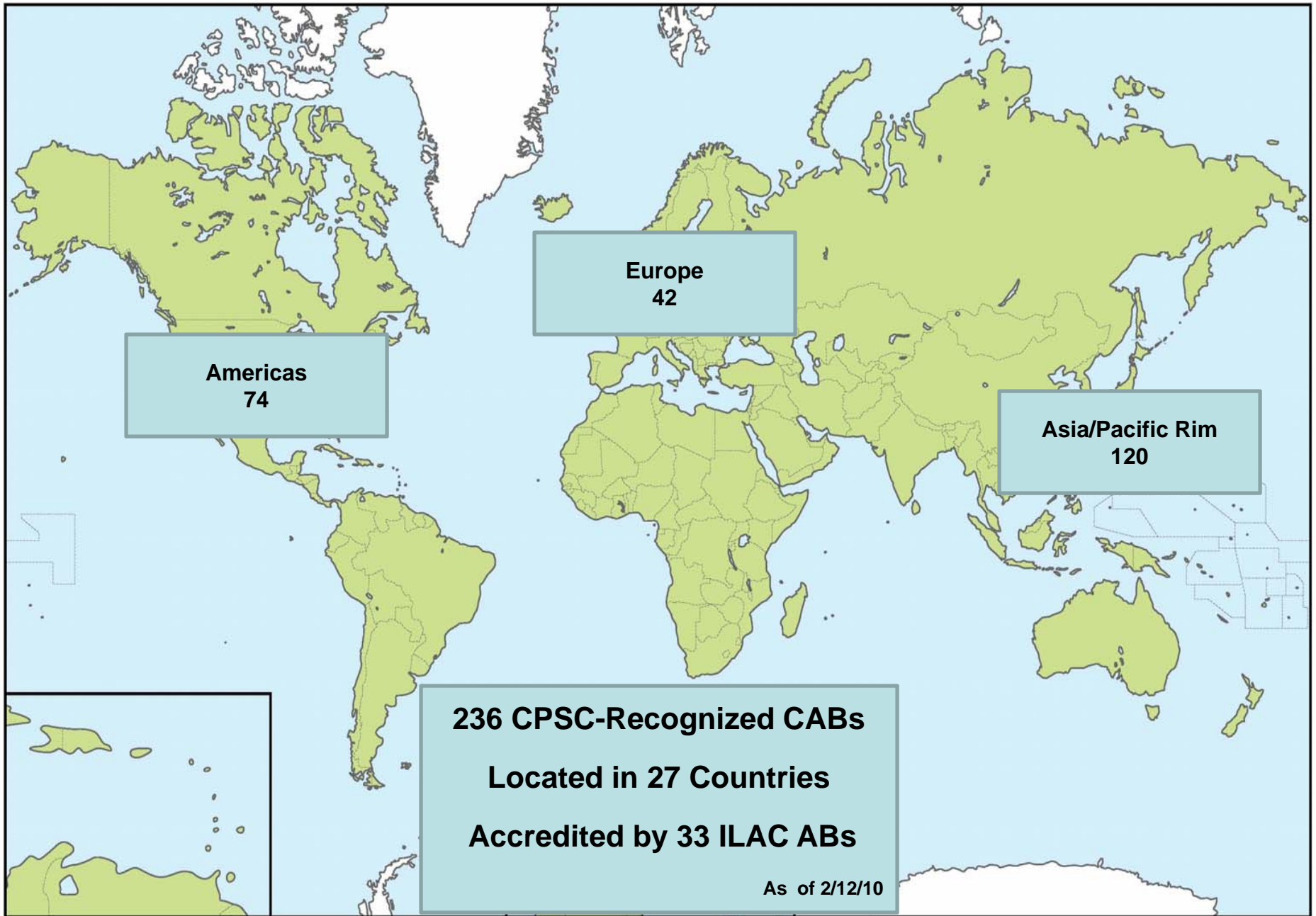
- Requirements for CPSC recognition
 - the laboratory must be accredited by a laboratory accreditation body that is a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA)
 - the laboratory scope of accreditation must include the test methods required by CPSC laws and regulations
 - the laboratory must apply to the CPSC for recognition and must agree to fulfill the requirements of the CPSC program
- CPSIA provides for periodic review and revision of the requirements

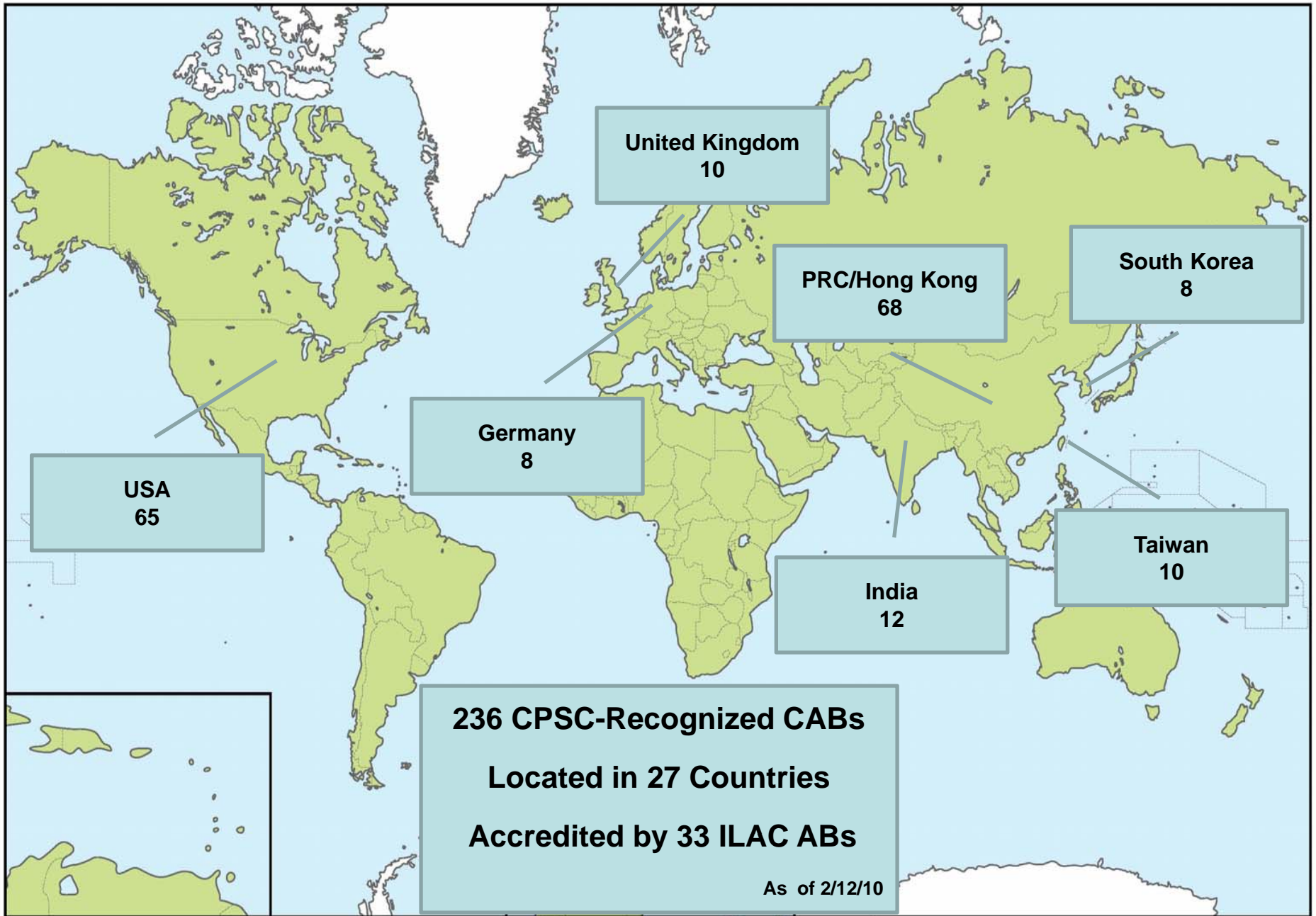


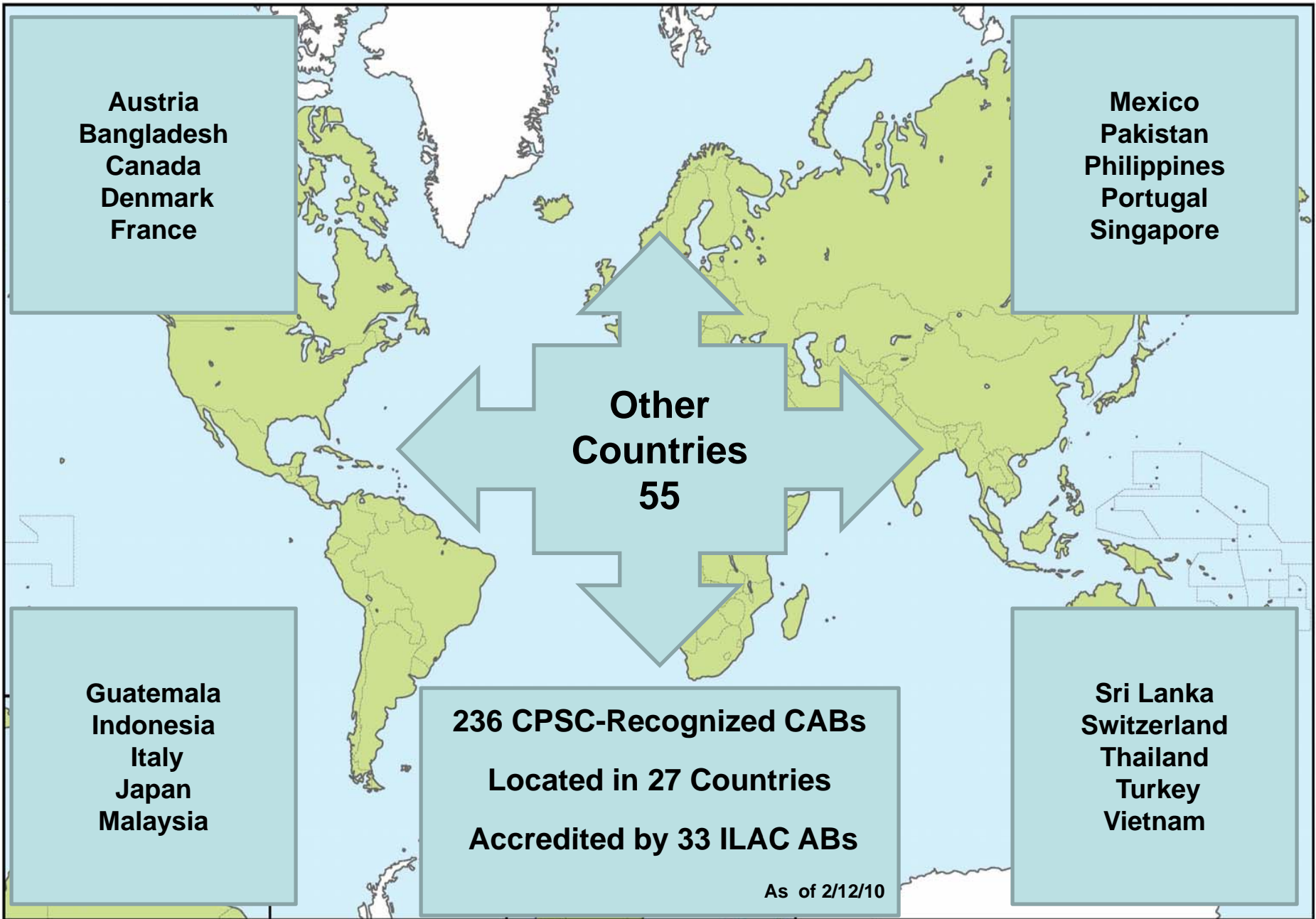
Third-Party Testing Laboratories

- The CPSC program provides for the participation and recognition of laboratory accreditation bodies and test laboratories located inside and outside of the US



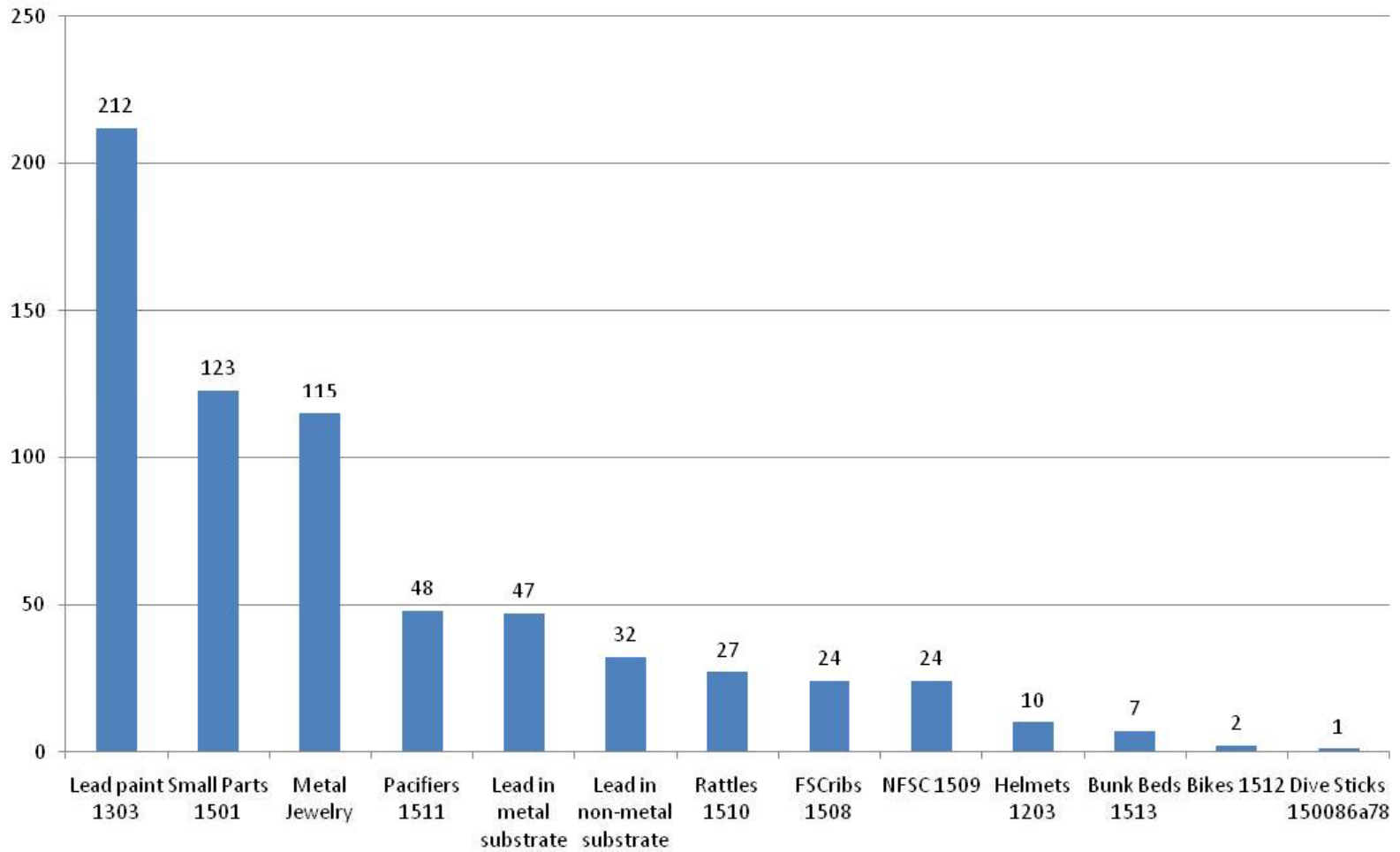








CPSC-Recognized CABs as of February 12, 2010





Jay Howell
Director, Office of Hazard
Identification and Reduction

rhowell@cpsc.gov

