Regulated Product Testing and Certification

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

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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
236 CPSC-Recognized CABs
Located in 27 Countries
Accredited by 33 ILAC ABs

As of 2/12/10

http://english.freemap.jp/
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CPSC-Recognized CABs as of February 12, 2010

- **Lead paint 1303**: 212
- **Small parts 1501**: 123
- **Metal jewelry 1511**: 115
- **Pacifiers 1511**: 48
- **Lead in metal substrate**: 47
- **Lead in non-metal substrate**: 32
- **Rattles 1510**: 27
- **FSC cribs 1508**: 24
- **NFSC cribs 1509**: 24
- **Helmets 1203**: 10
- **Bunk beds, bikes 1513**: 7
- **1512 Dive sticks**: 2
- **150086a78**: 1
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