PROMOTIONAL PRODUCTS ASSOCIATION INTERNATIONAL

GUIDE TO RESPONSIBLE SOURCING IN THE PROMOTIONAL PRODUCTS INDUSTRY

Regulations & Liability

Social Standards

Environmental Standards

Evaluation, Testing & Compliance

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How To Use This Guide

Definitions

The first time a scientific or technical term is used, the term and its definition appear in the gray column on each page marked by ⓘ.

Substrate:
The material or substance on which an enzyme acts.

Links To More Information

Whenever a document or source available online is cited, a linked citation appears in the gray column on each page marked by .

FIND OUT MORE ONLINE
The CPSC provides Age Determination guidelines on its website.

Notes

Added for the reader to better understand the topic or call out information that might be useful to know. A ⚠ with the information will appear in the gray column.

Note:
There may be multiple standards that may apply to a promotional product, some for performance and some for design.

Tables And Figures

Tables and figures reconstruct complex material into illustrative guides and at-a-glance references. Table or figure name will appear in the gray column on each page along with a brief description.

Table 1.5:
Tracking Labels For Products With Multiple Components

Product	Tracking Label G
Pens	Main component
Puzzles	The board or box
Wooden Blocks	It might be reason come with a stora tracking labe
Crayons	The tracking label
Lip Gloss	A reusable carryin

Summary Resources

The summary of resources at the end of each part include guidance on the next steps to take based on the presented information and a list of all internet sources, which is useful for further research.

PART THREE RESOURCES

Next Steps:

1. Review PPAI's website for an updated list of Frequently Asked Questions and send
to our product safety experts.

Further Reading And Internet Sources:

- ASTM Standards: www.astm.org/Standard/index.shtml
- Consumer Product Safety Commission: www.cpsc.gov

PPAI Web Resources

Find more product responsibility information at PPAI's website. Topics and resources include:

- Consumer Product Safety Improvement Act (CPSIA)
- California Proposition 65
- Green Guides
- Frequently Asked Questions

List Of Acronyms

A2LA	American Association for Laboratory Accreditation
ACIL	American Council of Independent Laboratories
ACLASS	Assured Calibration and Laboratory Accreditation Select Services
ANAB	American Society for Quality National Accreditation Board
ANSI	American National Standards Institute
ASTM	American Society for Testing and Materials
CB	certification body
CER	Certified Emissions Reductions
CGL	commercial general liability
CO_2e	carbon dioxide-equivalent
CPSA	Consumer Product Safety Act
CPSC	Consumer Product Safety Commission
CPSIA	Consumer Product Safety Improvement Act
ECIA	Electronic Components Industry Association
EPA	Environmental Protection Agency
FFA	Flammable Fabrics Act
FHSA	Federal Hazardous Substances Act
FLA	Fair Labor Association
FTC	Federal Trade Commission
IEC	International Electrotechnical Commission
IEEE	Institute for Electrical and Electronics Engineers
ILO	International Labour Organization
ISO	International Organization for Standardization
LCA	life cycle assessment
LCI	life cycle inventory
NACLA	National Cooperation for Laboratory Accreditation
NEISS	National Electronic Injury Surveillance System
NIST	National Institute of Standards and Technology
NVLAP	National Voluntary Laboratory Accreditation Program
PPPA	Poison Prevention Packaging Act
RSA	Refrigerator Safety Act
SAI	Social Accountability International
SDO	Standard Developing Organizations
SDOC	supplier's declaration of conformity
UL	Underwriters Laboratories
UN	United Nations

Introduction

For years the promotional products industry has demonstrated its effectiveness and value—promotional products are targeted, personal, long lasting and connect to all our senses in a way no other advertising medium can match. However, today's business environment increasingly looks beyond the product itself to evaluate its safety and social and environmental footprint.

End buyers want safe and reliable products, free from harmful chemicals and toxic material. They want products produced in non-polluting environments and ones that meet social and environmental standards, and are not likely to embarrass a company through a product recall. The extra quality assurance, product testing, inspections and auditing necessary to produce these kinds of safe and quality products adds more costs and increases the complexity of delivering a product into the stream of commerce.

We're entering a new era. Partnerships between suppliers and distributors are needed now more than ever. Reliability, trust and proven track records will create the added value the marketplace expects. It is everyone's responsibility to become more educated, more realistic and more thoughtful throughout the distribution channel.

It is our hope that this guide will provide you with direction and clarity in assessing and meeting these product, social and environmental responsibility compliance challenges.

PART 1: Product, Packaging And Decorating Evaluation

When evaluating, developing or launching a product, you must conduct a formal evaluation of the product to ensure that it is safe, appropriate and meets the social and environmental expectations of the end buyer. This evaluation should address the product, its packaging and any decoration to the product itself.

FIND OUT MORE ONLINE

PPAI's Best Practices have multiple resources to help evaluation products.

All formal product evaluations are unique and can be complex, but some basic steps are common to all evaluations:

- ❑ Identify all critical parts and address potential manufacturing and decorating concerns.
- ❑ Assess the performance and functionality of the promotional product, packaging and decoration.
- ❑ Evaluate the life cycle of the product:
  - – Who will use it?
  - – How will it be used?
  - – How long is the item expected to last?
  - – How will the user dispose of the product?
- ❑ Identify risks associated with the product, packaging and decoration. For examples: electrical, mechanical, chemical, environmental, toxicity and flammability hazards. Assess key potential safety issues, human factors concerns and recommendations based on experience and available injury data relative to the type of product.
- ❑ Identify all applicable mandatory regulations, industry standards and end-buyer test specifications to which the item, packaging and decorating will be subjected. PPAI Promotional Products TurboTest, **www.ppai.org/turbotest** is a useful resource for identifying regulations and standards.
- ❑ Identify all potential areas of non-compliance with applicable regulations, standards and end-buyer specifications; identify required modifications to bring the item into compliance.
- ❑ Conduct age grade determination.
- ❑ Evaluate labeling requirements specific to the submitted item.
- ❑ Evaluate recall history, if any, of similar items.

Summing It Up

When regulations exist, compliance is required by law. This is a challenging issue in the promotional products industry because the ultimate use and users of the product are not always known at time of manufacture. Promotional products that are intended for use by adults are given out at trade shows and in workplaces and may end up in the hands of children. This does not mean that every promotional product must be designed as safe for children of all ages, but it does mean that a determination about its appeal and foreseeable use by children needs to be considered when manufacturing or distributing a promotional product. It is vital that you communicate frankly with your promotional products partner to ensure that the right product is selected for a specific application.

PPAI Resources:

Product Responsibility Best Practices:

http://www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/bestpractices

PPAI Guide To Navigating The Consumer Product Safety Improvement Act:

http://www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/Documents/PR-Guide-Navigating-the-CPSIA.pdf

PPAI Recall Manual:

http://www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/Documents/PR-Recall-PPAI-Product-Recall-Manual.pdf

Consumer Product Safety Commission (CPSC) Resources:

CPSC Regulated Product Handbook:

www.cpsc.gov//Global/Business-and-Manufacturing/Business-Education/RegulatedProductsHandbook.pdf

Handbook for Manufacturing Safer Consumer Products:

http://www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/Documents/HandbookEnglishAug05.pdf

CPSC Recall Handbook:

www.cpsc.gov//PageFiles/106141/8002.pdf

UL Resources:

Hardlines Inspection Request Form:

http://www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/Documents/PR-Recall-PPAI-Product-Recall-Manual.pdf

PART 2: Standards And Testing

SECTION 2.1: Standards

A *standard* is defined by the National Standards Policy Advisory Committee as:

> A prescribed set of rules, conditions or requirements concerning definitions of terms; classification of components; specification of materials, performance, or operations; delineation of procedures; or measurement of quantity and quality in describing materials, products, systems, services, or practices.

Although most consumer products have specific, mandatory safety regulations and standards that are applicable to them, many larger end buyers that are focused on protecting their brands, may impose additional requirements for safety and quality of their promotional products. Suppliers and distributors should always ask their respective clients for information on any additional requirements that may apply to the product before they quote on an item.

There are more than 30,000 procurement specifications, mandatory codes, rules and regulations containing standards developed at every level of government.

In addition, many non-U.S. national, regional and international organizations produce standards of importance to U.S. manufacturers, importers and exporters. The **International Organization for Standardization (ISO)**, in Geneva, Switzerland, produces the largest number of International Standards. More than 19,500 ISO standards have been created through the work of more than 3,500 technical bodies and more than 20,000 experts from all over the world.

Standards may be classified in different ways. *ISO* uses eight general classifications:

Basic standard has a broad ranging effect in a particular field, such as a standard for metals that affects a range of products from cars to screws.

Terminology standards define words permitting representatives of an industry to use a common, clearly understood language.

Testing standards define the test methods to be used to assess the performance or other characteristics of a product.

Product standards establish qualities or requirements for a product, or related group of products, to assure that it will serve its purpose effectively.

ISO:
a non-governmental organization that promotes the development of standardization and related activities to facilitate the international exchange of goods and services, and to develop cooperation in intellectual, scientific, technological, and economic activity.

FIND OUT MORE ONLINE

about ISO's standards available for purchase.

Note:
There may be multiple standards that may apply to a promotional product, some for performance and some for design.

Process standards specify requirements to be met by a process, such as a manufacturing line's operation, in order to function effectively.

Service standards, such as servicing or repairing a car, establish requirements to be met to achieve the designated purpose effectively.

Interface standards, such as the point of connection between a telephone and a computer terminal, concern the compatibility of products.

Data requirements provide necessary values for a product or service.

Standards can describe characteristics of the product and/or the methodology, for example test, inspection or other assessment methods, used to assess conformity of the product to a design or performance standard. The goal of standard writing is to produce a standard that is clearly and concisely written, readily understood, precise, technically credible, and contains only unambiguous requirements.

Conformity assessment:
Process of determining whether someone or something meets the requirements of a standard.

When written into standards, requirements are generally stated in terms of shall or will, rather than may. In addition, standards for *conformity assessment* methods, for example test methods, must be capable of evaluating the conformance of a product to the specified requirements in a manner that produces test results within an acceptable range, are consistent and reproducible. In other words, repeat tests should yield the same or similar results when using the same or a similar test method and be capable of being duplicated by other testing bodies.

A relevant distinction between standards is the manner by which they specify requirements. Performance standards describe how a product is supposed to function. Design standards define the characteristics of how a product is supposed to be built. In general, the standards community generally prefers performance standards to design standards. Although performance standards are more difficult to develop and enforce, they tend to be less restrictive than design standards and therefore promote innovation.

SDO:
refers to the thousands of industry- or sector-based standards organizations that develop and publish industry specific standards.

SECTION 2.2: Brief History Of Standard Developing Organizations (SDO)

In the United States, the 20 largest *SDO*s produce 90 percent of the standards. As of May 7, 2015, over 280 SDOs were accredited by ANSI and there were more than 10,000 American National Standards (ANS).

The **American Society for Testing and Materials (ASTM)**, founded in 1902, is one of the oldest SDOs and now produces the largest number of non-governmental, *voluntary standards* in the United States and many are used worldwide. It is the source for many of the product lines of interest to the promotional products industry.

voluntary standard: are safety standards developed through collaboration and research of best safety practices

The **Underwriters Laboratories (UL), www.ul.com**, is one of the best-known of the SDOs involved with a wide range of consumer products, from electrical appliances to batteries and batteries to toys and childcare items. UL was founded in 1894 and has operations around the world.

Some trade associations develop standards, such as the **Electronic Components Industry Association (ECIA), www.ecianow.org**. Professional and technical organizations are also standards developers. The **Institute for Electrical and Electronics Engineers (IEEE), www.ieee.org**, founded in 1884, maintains more than 1670 standards and projects under development.

FIND OUT MORE ONLINE

Standards are available for purchase on the ANSI website.

SECTION 2.3: The Role Of The American National Standards Institute

Contrary to popular perception, the **American National Standards Institute (ANSI), www.ansi.org**, is not a standards developing organization. Founded in 1918 as the American Standards Association, it is a private nonprofit organization that administers and coordinates U.S. voluntary standardization and conformity assessment activities. Its mission is to enhance U.S. global competitiveness and the American quality of life by promoting, facilitating and safeguarding the integrity of the voluntary standardization system. It is the organization that approves standards developed by SDOs described above, as "American National Standards." It is also the coordinator and manager of U.S. participation in the work of ISO and the **International Electrotechnical Commission (IEC), www.iec.ch.**

For a business in the promotional products industry interested in finding standards, ANSI is a recommended source. It should be noted that most standards are actually proprietary documents. It is very difficult to find a free copy of a standard as most standards are available only for purchase.

CPSIA: Signed into law on Aug. 14, 2008. It is designed to allow The CPSC to better regulate the safety of products made and imported for sale in the U.S.

How do I know what standards apply to a promotional product or the production process?

There is no easy answer to this question. Some standards developing organizations, including the **American National Standards Institute (ANSI)** and the **Consumer Product Safety Commission (CPSC)**, have some search engines that can provide assistance in identifying standards, but they are difficult to navigate. PPAI has developed **Promotional Products TurboTest, www.ppai.org/turbotest,** to guide members through the compliance process. While TurboTest is a good place to start, it focuses on the **Consumer Product Safety Improvement Act (CPSIA)** and some specific state regulations, and is not all encompassing.

FIND OUT MORE ONLINE

The CPSC provides the full text of the CPSIA on it's website.

In addition to the product standards, end buyers may have expectations or requirements for addressing societal standards or environmental standards as well as age-related requirements.

SECTION 2.4: Testing To Assure Compliance With Standards

There are more than 100 private organizations and more than 60 Federal programs in the U.S. that test and certify products ranging from electrical cords to cell phones. Product certification is intended to confirm that the product conforms to one or more specified standards. It is a method to increase an end buyer's and consumers' confidence in a product and for furnishing product information.

There are several paths to achieve this conformity assurance:

Manufacturer's self-declaration of conformity is when a manufacturer or supplier attests to the fact that his or her product meets one or more standards.

Third-party certification is the term applied to the process by which an organization, independent of either the manufacturer or supplier, assesses the product's conformance to one or more standards.

The manufacturer's overall quality control program may also be examined as part of the certification process. Third-party certification programs differ greatly and the degree of confidence in the resultant certification depends on the program's type and comprehensiveness.

The methods used in third-party testing/certification programs can be classified as follows:

Type-testing/initial inspection assures that the manufacturer's design specifications can produce a product that conforms to a particular standard. Products from a production run are not inspected or tested and there is no information regarding whether products from a production run also consistently meet the specification.

Audit-testing, in which test samples are selected at random from the marketplace.

Surveillance of the manufacturing process assesses the manufacturer's production and control processes to ensure that the manufacturer's quality control procedures are adequate.

Field investigations investigate alleged failures of products under use conditions to determine the cause of the failure and suggest corrective action.

Batch-testing tests a sample of products from a production batch for conformance to the standard. It does not ensure that products made previously or subsequently in the production run also meet the standard.

100 percent testing, as it implies, tests each individual product to determine if it meets the designated standard. If the testing procedures are adequate and performed by an accredited laboratory, it provides the highest possible level of assurance that the product conforms to a particular standard. It is also usually the most expensive method and can only be used, obviously, when the test has no adverse effect on the product.

Many testing/certification providers use two or more of these methods in their certification process. The choice of methods depends on the needs of the end buyer as well as the promotional product supplier and distributor and the nature of the product. The methods chosen can greatly affect both the cost of the program and the level of confidence that can be ascribed to it.

SECTION 2.5: Laboratory Accreditation

To ensure end-buyer and consumer confidence, the advice and services of an independent accredited laboratory should be considered. Laboratory accreditation is a process for evaluating testing facilities and designating those laboratories judged competent to perform specific tests using standard test methods, where available. The **National Voluntary Laboratory Accreditation Program (NVLAP), www.nist.gov/nvlap,** in the NIST and the **American Association for Laboratory Accreditation (A2LA), www.a2la.org,** are the two largest accreditation bodies in the U.S., although with the rapidly increasing demand for these services, new accreditation bodies have developed, such as Assured Calibration and Laboratory Accreditation Select Services (ACLASS), owned by ANSI and the **American Society for Quality National Accreditation Board (ANAB), anab.org**.

Why is accreditation important?

The rigorous, internationally recognized accreditation process assesses the competence of a laboratory to conduct testing, generally using standard test methods. The process can greatly enhance the quality of certification programs or the confidence of the party requesting testing because it requires evidence that the laboratory that achieves accreditation has competent personnel, adequate equipment and sufficient knowledge of the testing procedures for which accreditation is sought. In addition, several accreditation organizations are directly recognized by international and regional accreditation bodies around the world. The U.S. recognition body is the **National Cooperation for Laboratory Accreditation (NACLA), www.nacla.net**.

How to find a laboratory?

There are several paths to finding an accredited laboratory to assist you in ensuring the safety and efficacy of a product:

- The **American Council of Independent Laboratories (ACIL), www.acil.org**, founded in 1937, requires accreditation as a criterion for membership for all areas of testing a laboratory may conduct for which accreditation is required and the annual signing of the ACIL Code of Ethics. ACIL provides a useful

FIND OUT MORE ONLINE

The ACIL Code of Ethics is available on its website.

FIND OUT MORE ONLINE

Use ASTM's search tool to find a lab by services or specialties.

FIND OUT MORE ONLINE

CPSC lab accreditation resources and list of accepted labs.

referral service, by which those seeking laboratories services can submit a detailed request and that will be distributed to the ACIL member labs to match needs with member capabilities.

- Most accreditation bodies provide a list of their accredited laboratories online.
- In addition, several of the larger SDOs, such as ASTM International, provide a search for a laboratory feature. However, it does not specify whether the laboratories listed are accredited.
- Federal law requires that every children's product subject to a federal consumer product safety requirement be tested by a CPSC-accepted laboratory for compliance with the applicable federal children's product safety requirements.

With the plethora of products, many requiring multiple tests or test methods for a variety of intended uses, it is recommended that you seek an accredited laboratory within the scope required. Accredited laboratories are required by the accreditation process to own a copy of the standards for which they can provide testing services and to ensure they are current, many standards undergo revisions, particularly in fast-moving industries, such as information technology and telecommunications.

Given the challenges associated with identifying all standards and regulations, it may be worthwhile for your organization to rely on the advice and services of an independent accredited laboratory (often referred to as a testing partner).

❑ ***No conflict-of-interest.***

The laboratory should be a legal entity, organized in a manner that permits satisfactory performance of all required functions in an impartial and unbiased fashion.

❑ ***Financial stability***.

The laboratory should have sufficient resources to enable it to properly use and maintain the test equipment and facility, to satisfactorily perform all required functions, and to adequately indemnify itself against financial liabilities/penalties resulting from its operations.

❑ ***Staff qualifications requirements.***

Each staff member in the laboratory should have the education, training, knowledge and experience necessary to perform the tasks assigned and an appropriate level of supervision should be maintained. The training of each staff member should be kept current and documented.

❑ ***Adequate quality system.***

The laboratory should have a quality system appropriate to the type and amount

of work performed. It should be suitably documented in a comprehensive manual that is readily available for consultation by staff.

❑ *Sampling requirements.*

If a laboratory receives test materials in quantities larger than the amount required for the test, the laboratory should sample the material in such a manner as to ensure that the sample tested is representative of the entire quantity of material received, using appropriate sampling methods and/or techniques.

❑ *Sample control/integrity requirements.*

The laboratory should have an effective system that ensures both the identity and integrity of the test samples. Maintaining the sample's integrity involves preventing it from being damaged during any stage of its collection, shipment, storage or handling.

❑ *Statistical methods requirements.*

The statistical methods used to interpret or to provide additional information about test data should be appropriate and adequate for the type and level of testing undertaken.

❑ *Record-keeping requirements.*

A laboratory should maintain all test records, observations, calculations and derived data for all tests it performs for an appropriate time or as required by law.

❑ *Test report content/format requirements.*

Test reports should include all information relevant to sample selection, test performance and test results. They should be in a format that is easy to read and understand and routinely audited and validated. Increasingly, laboratories are offering online testing scheduling and online delivery of final test data.

❑ *Available operational manuals/instructions.*

The laboratory should have readily available instructions on the operation and maintenance of all materials and equipment, copies of the test methods and standards employed with any additional instructions needed on their application, sample selection and handling procedures, and any other relevant information necessary to ensure the quality of the work performed.

❑ *Participation in proficiency testing programs.*

The laboratory should participate in proficiency testing programs, if they are available for the scope of the item being tested, to ensure the competence of its

testing processes. Proficiency testing can provide the laboratory with valuable feedback on the competence of its testing processes.

❑ *Adequacy of facilities and equipment*.

The laboratory should own or have access to all equipment required to perform all test methods it conducts. The facility should require test methods to be conducted in a controlled environment to prevent any adverse effects on the test result's accuracy.

❑ *Equipment maintenance/repair/calibration requirements.*

Equipment calibration, preventive maintenance and repair procedures and the choice of reference materials used for calibration should be appropriate for the nature and amount of work being performed. Equipment calibrations should be traceable to some ultimate or national reference standard. Complete records should be maintained on these procedures.

❑ *Adequate control over subcontractors.*

The laboratory should have a system to ensure that testing and related work performed by any of its subcontractors is at an acceptable level of quality.

❑ *Appeals procedure.*

The laboratory should have a mechanism to deal with technical questions, appeals, complaints and challenges, originating either from the customer or from interested regulatory or other parties.

Note:
Often, testing cost are lower when performed in the same locale as manufacturing. If a product is produced overseas, consider having testing performed in the country of origin

Third party testing/ certification providers can provide other services necessary to conduct a product responsibility program.

Can I test the products or processes myself?

Typically, the answer is yes, with a few notable exceptions, particularly in the area of children's products. Some consumer products have no standards or regulations however, many larger end-buyers that are focused on protecting their brands, may impose additional requirements for safety and quality. Suppliers and distributors should always ask their respective clients for information on any additional requirements that may apply to the product before they quote on an item.

If it is not a matter of law or specific end buyer requirement, the relevant questions are:

- Can I meet the end buyer's expectations with a conformity self-assessment?
- Do I have the capacity to identify the standards and tests myself?

Third party testing/certification providers can provide other services necessary to conduct a product responsibility program, such as:

Conformity Assessment:

- Concept review and safety consultation
- Formal design evaluation (if needed)
- Develop a Quality Assurance Plan (QAP)

- Facilitate the implementation of the processes and procedures outlined in the QAP
- Test product to meet end buyer's standards and local requirements and standards
- Preproduction testing
- Intervention testing
- Provide immediate update on testing result by issuing short report
- Provide final detailed reports
- Factory audit (if needed)
- Provide guidance and assistance on Corrective Action Plan (if failure occurs at preproduction and/or intervention)
- Sample collection for intervention testing
- Witness for sample destruction if required
- Provide product recall information, changes in regulatory information and scientific updates
- Provide injury data

Other services can include:

- Research testing
- Process validation
- Site inspection audit
- Online inspection during mass production at manufacturing facility
- Provide a service package and educate new vendors and manufacturers on end buyer's safety and quality expectations
- Perform factory orientations, including education to factory workers on safety processes, quality control, etc.

Further Reading On Standards And Tests:

Understanding Standards And Conformity Assessment

The National Institute of Standards and Technology (NIST): www.nist.gov

ABCs of Standard-Related Activities in The United States: gsi.nist.gov/global/docs/pubs/NISTIR_3821.pdf

The ABCs of the U.S. Conformity Assessment System: gsi.nist.gov/global/docs/pubs/NISTIR_6014.pdf

The Consumer Product Safety Improvement Act (CPSIA): www.cpsc.gov/en/Regulations-Laws--Standards/Statutes/The-Consumer-Product-Safety-Improvement-Act/

Where To Find A Testing Laboratory

The American Council of Independent Laboratories (ACIL): www.acil.org

- ACIL Code Of Ethics: www.acil.org/?page=712

The ASTM Laboratory Search Engine: www.astm.org/LABS/search.html

The CPSC Lab Accreditation resources and list of acceptable laboratories: www.cpsc.gov/en/Business--Manufacturing/Testing-Certification/Lab-Accreditation/

Where To Buy Standards

The American National Standards Institute (ANSI): www.ansi.org

International Organization For Standardization (ISO): www.iso.org

PPAI Best Practices:

Undue Influence
http://www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/Documents/PR-BP-Undue-Influence.pdf

Working With A Test Lab
http://www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/Documents/PR-BP-Working-With-A-Test-Lab.pdf

Component Part Testing
http://www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/Documents/PR-BP-Component-Part-Testing.pdf

Reasonable Testing Program
www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/Documents/PR-BP-Reasonable-Testing.pdf

Product Inspection
http://www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/Documents/PR-BP-Product-Inspection.pdf

Hazard Identification
http://www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/Documents/PR-BP-Hazard-Identification.pdf

Product Life Cycle
http://www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/Documents/PR-BP-Product-Life-Cycle.pdf

Restricted Substances
http://www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/Documents/PR-BP-Restricted-Substances.pdf

PART 3: Age Grading

Age grading helps manufacturers, suppliers, importers and distributors determine the applicability of mandatory toy regulations to toys that are given as promotional products. While most promotional products are not intended for use by children, it is helpful to know where the lines are drawn.

FIND OUT MORE ONLINE

See the CPSC detailed guidelines for small parts in children's products.

Toys age-graded for children under three years of age are subject to the **Consumer Product Safety Commission's (CPSC) small parts regulation.** Toys and games age-graded for children at least three years of age, but not older than six, containing small parts are subject to labeling requirements. In addition, there are tests for identifying hazardous sharp edges and points in toys and children's products age-graded for children under eight years of age. Similarly, many of the requirements in industry voluntary standards apply to toys for children of specific age ranges.

Figure 3.1:
Choking Hazard Warning Label

WARNING

Choking Hazard Children under 8 yrs. can choke or suffocate on uninflated or broken balloons. Adult supervision required. Keep uninflated balloons from children. Discard broken balloons at once.

Federal law also imposes specific warning label requirements for certain toys and games containing small parts intended for use by children over three years of age but not older than six years of age; for small balls and marbles intended for children three years of age or older; and for balloons. These requirements warn purchasers that these products are not suitable for children under three years of age because the products present choking risks or, with balloons, that children under eight can choke or suffocate on uninflated or broken balloons. The law also bans small balls for children under three years of age that pass through a circular hole with a diameter of 1.75 inches (44.4mm).

The industry standard, ASTM F963, "Standard Consumer Safety Specification on Toy Safety," includes information on age grading toys. This specification covers hazard identification, various age requirements by product type and "contains test methods for toys intended for use by children under 14 years of age".

Further Reading And Internet Sources On Age Grading:

Age Determination Guidelines: Relating Children's Ages To Toy Characteristics and Play Behavior: www.cpsc.gov//PageFiles/113962/adg.pdf

PPAI's Best Practices-Determing Children's Product: http://www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/Documents/PR-BP-Determining-Childrens-Products.pdf

ASTM F963 Standard: www.astm.org/Standards/F963.htm

PART 4: Production And Conformity Assessment

SECTION 4.1: Production Policies And Procedures

If an end buyer asks for assurances that a product and the production process will meet its standards for quality, safety and societal concerns, how does a company know what policies and procedures it needs to implement? In the product design and evaluation phase, the standards for the product and production process should have been identified. The majority of products recalled are due to design hazards rather than regulatory non-compliance. Standards and regulations are the minimum requirements. All products entering the U.S. stream of commerce must not simply be compliant with regulations—they must not expose consumers to undue risk of injury or even death.

Note:
The category, type and complexity of product will determine whether a company enlists the services of an independent third party certifier or perform their own conformance assessment.

Reverse engineering protocols allow for improved conformity assurance through the extraction of knowledge, design and performance information. To get to that end result, the company will have to conduct a conformity assessment of the product and the production process. A checklist is typically prepared to evaluate conformance to regulatory and performance requirements. The results will aid in the development of policies and actions a company needs to implement to assure compliance with standards.

FIND OUT MORE ONLINE
Read NIST's *The ABC's of the US COnfomity Assessment System*

SECTION 4.2: Conformity Assessment And Assurance

Conformity assessment is defined by the ISO as "any activity concerned with determining directly or indirectly that relevant requirements are fulfilled." According to NIST, "conformity assessment procedures provide a means of ensuring that the products, services, or systems produced or operated have the required characteristics, and that these characteristics are consistent from product to product, service to service, or system to system."

Conformity assessment includes:

- Sampling & Testing
- Inspection
- Certification
- Quality & Environmental System Assessment
- Registration
- Accreditation

The accreditation of the competence of those activities by a third party and recognition, usually by a government organization or non-governmental organization, of an accreditation provider's capability.

For the purposes of the promotional products industry, the conformity assessment of promotional products and processes is what we do to provide the proof that product and/or processes meet the expectations or requirements of end buyers.

SECTION 4.3: Types Of Conformity Assessment Activities

Inspection is defined by ISO as "conformity evaluation by observation and judgment accompanied as appropriate by measurement, testing or gauging." Most other types of conformity assessment involve inspection to some degree. It would be unusual to test a product without first inspecting it to determine if it is intact or has undergone rough handling that might have damaged it and therefore affect the testing outcome. Similarly, it would be unusual to assess a company's quality system without inspecting the elements of the facility that could impact the system's operations.

The following is a partial list of testing laboratories' data uses:

- Product design and research
- Quality control prior to acceptance of incoming materials/components, during production and prior to shipment/sale
- Insurance underwriting
- Meeting contractual agreements
- Satisfying government regulatory requirements
- Certification and labeling
- Buyer protection and information
- Product comparisons
- Environmental protection
- Product operation, maintenance and repair
- Legal proceedings
- Forensic work

The ISO standard for laboratory accreditation requirements include:

- Having adequate resources and using only properly trained staff
- Having a good quality system
  - ISO/IEC 17025 incorporates by reference ISO 9000 management programs; no separate registration for ISOIEC 9000 is necessary
- Using equipment that has been adequately maintained and calibrated
- Conducting tests under acceptable environmental conditions and using appropriate test methods; and
- Producing accurate, clear, unambiguous and objective test reports

Laboratories use ISO/IEC 17025 to implement a quality system aimed at improving their ability to consistently produce valid results. It is also the basis for accreditation from an accreditation body. Since the standard is about competence, accreditation is simply formal recognition of a demonstration of that competence. A prerequisite for a laboratory to become accredited is to have a documented quality management system. The usual contents of the quality manual follow the outline of the ISO/IEC 17025 standard.

Note:
ISO/IEC 17025 accreditation deals directly with testing and is the **THE** standard for labs. An organization can also get ISO 9000 certified, but it is a separate process for the overall business.

Certification is the process of providing assurance that a product conforms to a standard or specification or that an organization and/or individual is competent to perform a certain task.

Accreditation is the recognition by an independent accrediting body, that a certification body adheres to specific standards.

In some cases, certification programs may mandate that only accredited laboratories conduct any required testing, CPSIA for example. Certification and laboratory accreditation programs both use standards, however not all standards apply to every lab. It is recommended to choose a lab that is skilled and knowledgeable about all the regulations that apply to your product.

SECTION 4.4: Types Of Certification

There are three types of certification, reflecting different levels of testing:

First Party Certification:
or self-certification, is the process by which a manufacturer or supplier declares that the product meets one or more standards based on:

- The manufacturer's confidence in the quality control system
- The results of testing or inspection the manufacturer undertakes or authorizes others to undertake on his/her behalf.

The process is also known as supplier's declaration of conformity (SDOC). The manufacturer's capability, integrity and reputation determine the degree of confidence that can be placed in this type of certification, which is commonly used in Europe.

This is primarily a self-certification program, although some organizations do audit manufacturers' self-certifications to ensure their standards are not being misused.

For Example:
A familiar example of a first party certification program in the United States is the identification of the weight of motor oils by the manufacturer of conformance to the Society of Automotive Engineers (SAE) standards. The SAE designations are placed on the motor oils by the manufacturer based on his/her own testing and quality control mechanisms.

Second Party Certification:
is also common in the United States. It is usually the buyer who requires or certifies that the products they wish to purchase from a supplier meet standards. These certifications are generally only available for those companies wishing to be suppliers for a specific buyer.

Third Party Certification

is a process by which the producer's claim of conformity is validated by a technically and otherwise competent third party, a body not controlled by or under the influence of the producer or buyer.

The sponsor of the third party program, the certifier, may be responsible for collecting the required data, generating test results or conducting inspections, in addition to reviewing the results of these activities and making a final determination on the product's conformance or lack of conformance. The certifier may also delegate all or part of the data collection and review activities to another party or parties.

The degree of confidence that can be placed in third party certification programs varies greatly depending on:

- The number and types of testing/inspection methods used within the program to ensure product conformance.
- The adequacy of the manufacturer's quality control system.
- The competence of the body that conducts the testing and/or inspection and evaluates the test results.

As noted above, accredited laboratories are favored for this process.

SECTION 4.5: Certificates Of Conformity (Certification Marks)

ISO defines a certificate of conformity, also known as marks of conformity, as a "document issued under the rules of a certification system, providing confidence that a duly identified product, process, or service is in conformity with a specific standard or other normative document"

The marks, or accompanying information should include the following:

- Identify the certification body and any other testing bodies, if applicable
- The relationship between the certification body and the manufacturer
- The lot, batch or other production information
  - to allow traceability to the production source and time of production, thereby allowing a partial recall of a product, rather than the recall of an entire product line
- The date when the certificate was issued
- The officer of the company responsible for its issuance
- Proper labeling be applied and visible required by the certification

FIND OUT MORE ONLINE

Read PPAI's Best Practice for Secondary Tracking Labels for Third-Party Decoration Children's Apparel

FIND OUT MORE ONLINE

PPAI's Best Practice for Care Labeling

Labeling included with the product should identify the supplier and contain information on the name, type of model number and all instructions necessary for the correct and safe use and maintenance.

Certification marks and certificates of conformity should be used to indicate that all essential characteristics of the product have been assessed. In cases where only one of several aspects of the product have been evaluated, such as flammability or electrical safety, this information should be conveyed in some manner to the buyer, or the mark may mislead the buyer into placing more reliance on the certification than is justified. To the extent possible, the symbols used in connection with the certification mark should be capable of being interpreted without further definition.

SECTION 4.6: Self Assessment Checklist (Factory Audit) Example

The consumer products market is increasingly regulated and subject to scrutiny by many government agencies and consumer groups. It is essential that promotional products professionals can provide assurances that our products meet—or exceed—all international standards for quality, safety and societal concerns. The following is an example of a factory audit checklist for the purposes of conformity assessment:

Figure 4.6: Example Of A Self Assessment Checklist

MANAGEMENT OF QUALITY PROCESS				
	Yes	No	NA	Comments
Does the company have a process for quality management?				
Is it used routinely?				
Does management support the policy?				
Do employees understand the process?				
Does the company have a quality manual, standard operating procedures, and work instructions for the quality program?				
Are the responsibilities for quality control clearly identified?				
Does the company conduct internal self-audits for quality programs such pest control, sanitation and foreign material controls?				
Are corrective actions appropriate?				
Does the company have a procedure for handling obsolete documents?				
Is training of quality control personnel conducted and documented?				
Does quality control management have direct access to top management?				

MATERIALS				
	Yes	No	NA	Comments
Does the company have a written program for selecting raw material suppliers?				
Does the company maintain a list of raw material suppliers that have been approved?				
Is supplier compliance with company standards routinely monitored?				

continued on next page

MATERIALS(con't)

	Yes	No	NA	Comments
Is there a process for stopping products if products are not within specification tolerances?				
Can raw materials be tracked through the production process and identified with specific finished product lots?				
Are finished product lots coded to identify product dates and other lot designations?				
Do shipping records adequately identify production lots with customers?				
Is there a recall and/or withdrawal program in place? Has the company ever tested the program?				

SANITATION

	Yes	No	NA	Comments
Is there a written sanitation program?				
Is there a cleaning schedule for the facility?				
Are there work instructions and procedures for cleaning and sanitizing tasks?				
Are authorized chemicals and cleaning tools documented?				
Are all cleaning materials and sanitizers approved for use by the appropriate local regulatory agency?				
Are labels available for all cleaning and sanitizing chemicals?				
Are MSDS (Material Safety Data Sheets) available in the local language for all cleaning and sanitizing chemicals?				
Is there a training program for sanitation personnel?				
Are training records of sanitation personnel documented and maintained?				
Are inspection of cleaning and sanitation conducted and documented?				
Are corrective actions documented?				
Are concentration requirements or instructions for dilution of all sanitizing and cleaning chemicals clearly defined and presented in the cleaning program?				
Are cleaning equipment and chemical storage areas away from production areas?				
Is the cleaning equipment properly maintained, cleaned and sanitized?				
To permit proper cleaning, are processing and packaging equipment well maintained and designed?				
What is the status of various areas of the facility? Are they clean, neat and organized? For example, warehouse, tooling, moulding; assembly; spraying, packing and shipping.				
Are toilets clean and maintained in good condition?				
Is soap and running water available outside each toilet?				
Are there disposable towels or hand dryers available?				
Is there a procedure for proper cleaning and sanitation before equipment is placed back into service following maintenance?				
Are procedures in place for the notification of production and sanitation personnel when maintenance work is complete?				
Are all repairs and equipment modifications made in an appropriate and complete manner?				

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SANITATION (con't)

	Yes	No	NA	Comments
Are procedures in place for reconciling parts and tools after maintenance is performed?				
To protect product integrity and prevent possible product contamination, are the facility and equipment properly maintained?				
Are there adequate ventilation systems?				

PEST CONTROL

	Yes	No	NA	Comments
Does the factory have a pest control program?				
Internal or outsourced pest control service?				
How often are pest control audits conducted?				
Are service and audit records maintained?				
Are pest control personnel trained? If licensing is required, are they licensed?				
Are training records maintained?				
Are MSDS's for all pesticides available?				
Is pest control management of external areas, adequate and appropriate?				
Is pest control management of interior areas adequate and appropriate?				
Are records maintained for pest control services and devices?				
Is the facility adequately maintained to prevent pest entry?				
Are windows, vents and fans adequately sealed or screened with fine mesh to exclude pests?				
Are all entrances of production and finished goods storage areas properly closed?				
Are production and finished product areas free of obvious evidence of pests?				
Are yard areas free of conditions that may result in the contamination of materials?				
Is drainage around the facility adequate?				
Are water drainage covers fully protected by a metal screen?				

INCOMING MATERIALS

	Yes	No	NA	Comments
Are all incoming materials identified with date of receipt and assigned batch number?				
Is appropriate physical inventory management used (e.g., first-in, first-out) for all stored material products?				
Are there purchasing and receiving procedures to ensure that only approved materials are used in the facility?				
Are all critical materials accompanied by suppliers' assurances that all appropriate standards have been complied with before delivered?				
Are raw materials isolated from processing and finished product storage areas in storage areas of their own?				
Are containers that are used to contain raw materials properly maintained to prevent contamination of products or materials?				

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INCOMING MATERIALS (con't)

	Yes	No	NA	Comments
Are there written cleaning procedures for paint mixing containers?				
Is transfer of raw materials that are dispensed into other containers performed in an adequately ventilated area?				
Are temporary containers properly labeled and identified?				
Are all personnel handling chemicals properly trained in dispensing, mixing and handling procedures?				
Are training records maintained?				

PRODUCTION PRACTICES

Sharp Tools	Yes	No	NA	Comments
Is there a written sharp tool control policy?				
Are sharp tools restricted or controlled in the production area?				
Are the sharp tools tied on the bench table or sewing machine?				
Are all cutting blades of the one- piece design?				
Are there adequate posting and warnings of sharp tool control policy in the production and packaging areas?				
Are records kept of broken sharp tools and needles?				
Are records kept of the distribution and return of sharp tools and needles?				
Is the distribution of sharp tools controlled by a single person?				
Is there a written procedure for the investigation of missing sharp tools?				
Are follow-up corrective actions taken if a sharp tool, such as a broken needle, cannot be found after breakage?				

Metal Detector	Yes	No	NA	Comments
Is there a metal detector?				
Is the metal detector working properly?				
Is the metal detector calibrated per preset time intervals?				
Is the metal detector calibrated per specification?				
Are there written calibration procedures for the metal detector?				
Are there calibration and maintenance records for the metal detector?				
If a finished product contains metal, is metal detection being conducted prior to insertion of the metal component as per requirement?				
Do workers understand of the operation of the metal detector?				
Are the calibration balls kept in a secure location that is only accessible by approved persons?				
Is the metal detector isolated from other machinery or production that might influence the detection capability of the metal detector?				
Is packed final product (without metal parts) passed through the calibrated metal detectors prior to master carton packing?				
Is the metal detector checked to verify calibration at start-up and after breaks to ensure its sensitivity and normal operation?				
Are calibration records kept?				
Can good product and nonconforming product after metal detection be traced?				
Are finished non-conforming products segregated and identified?				

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PRODUCTION PRACTICES (con't)

Metal Detector (con't)	Yes	No	NA	Comments
Is nonconforming product kept in a secure container/area accessible only by approved persons?				
Are records maintained to indicate the status and disposition of finished non-conforming products (i.e., scrap)				
Is the area around the detector free of clutter and organized in a manner such that non-detected product cannot be mixed with detected product?				
Light Source	**Yes**	**No**	**NA**	**Comments**
Are light sources protected?				
- Product zone areas and storage area?				
- Incoming raw materials warehouse?				
- Final product warehouse?				
- Moulding?				
- Spraying?				
- Assembly?				
- Packing?				
Glass Source	**Yes**	**No**	**NA**	**Comments**
Are glass sources protected?				
- Product zone areas and storage areas?				
- Warehouse?				
- Assembly?				
- Packing?				
Is glass/hard plastic breakage handled according to a written policy?				
Is cracked or broken glass/brittle plastic properly replaced immediately?				
Miscellaneous	**Yes**	**No**	**NA**	**Comments**
Are cleaning chemicals, hazardous materials, pesticides and sanitizers properly stored and handled to prevent contamination of product and packaging materials?				
Is there an inspection program to address metal and other foreign material contamination?				
Are raw materials, work-in-progress or final products stored in sealed packaging or containers and properly covered to prevent contamination?				
Is there a barrier between all raw materials and in-process product and the production floor?				
Are incoming raw materials, work in-progress and finished product stored off the floors and 18 inches away from walls and ceiling?				
Is an 18-inch inspection perimeter maintained for incoming raw materials, work in-progress and finished product storage?				
Are there tabletop work surfaces with a durable and cleanable surface in assembly areas and pack out areas?				
Are finished products, work-in- progress, or packed products free from dust or other contamination?				
Is packed individual product passed through an ultraviolet [UV] channel prior to master carton packing?				
Are UV channels functioning properly and calibrated?				
Is finished product sufficiently aerated prior to over wrapping or master carton packing?				

GOOD MANUFACTURING PRACTICES

	Yes	No	NA	Comments
Does the company have an established good manufacturing practices (GMP) program?				
Are internal self-audits conducted and audit records documented?				
Are corrective action reports from GMP self-audit implemented?				
Are workers who are visibly sick, or have open wounds or sores, excluded from direct contact with raw materials, work-in-progress or final product?				
Are signs posted instructing workers to meet the GMP requirements?				
Are workers complying with the GMP policy in critical areas?				

Elements of practices:

Eating, drinking, spitting, smoking, gum chewing are restricted to designated areas and must be kept away from the product zone.

Workers should wear a functioning hair net and protective coat in the production area.

Personal belongings (i.e., watches, jewelry, earrings, rings, necklaces, drinking bottles) are prohibited from being brought into the production area.

Pockets above the waist should be sewn.

Unused tools (for example: tools, rags, gloves excluding sharp tools) should be stored away from the production area.

Workers with beards should wear beard restraints.

No false eyelashes, false nails, strong perfumes or exposed nail polish.

Workers must effectively clean their hands before entering the production area.

PRODUCTION

Start Up	Yes	No	NA	Comments
Are there start up procedures in place?				
Before production begins, are all the relevant information and tooling available?				
Are there procedures for set up and change over of manufacturing equipment at production line?				
Is production start up approved by appropriate management?				

Control Plans	Yes	No	NA	Comments
Are quality control plans implemented by production personnel?				
Are all processes or procedures clearly defined?				
Are critical manufacturing process settings on equipment defined with upper and lower operating limits?				
Are process control records kept and complete?				
Are statistical process control techniques integrated for the critical processes and practiced by production personnel?				
Do personnel understand statistical control and appropriately respond to out of control circumstances or decision rules?				
Are there clear rules and corrective action that should be taken?				

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Control Plans (con't)	Yes	No	NA	Comments
Are records complete when a critical process measurement is found to be out of control?				
Are work instructions established for all key processes?				
Are critical operating parameters being monitored and records maintained?				
Are there working instructions for key processes (e.g., gluing)?				
Is there a training program for key processes?				
Are training records for those key processes maintained?				
Testing Equipment	**Yes**	**No**	**NA**	**Comments**
Are there procedures for equipment maintenance?				
Are testing and key measurement equipment records maintained?				
Is the calibration of testing and key measurement equipment taking place as specified, including appropriate calibration tags on equipment? Is this verified?				
Equipment Maintenance	**Yes**	**No**	**NA**	**Comments**
Are there procedures for equipment maintenance?				
Are they followed?				
Are there procedures for identifying maintenance needs and verifying if maintenance has been performed?				
Plastic Production	**Yes**	**No**	**NA**	**Comments**
Are molding parameters and conditions recorded on a board hanging near the injection machine for auditing purposes?				
Is a signed sample/standard sample placed near the injection machine for cross-checking purposes?				
Is the cooling water changed at regular intervals (i.e., every half day) and are appropriate records kept?				
Is there a process in place to ensure that plastic materials meet requirements to prevent cross contamination?				
Are cartons/containers properly labeled?				
Painting	**Yes**	**No**	**NA**	**Comments**
Do production samples match control samples for color?				
Do workers have a signed sample/standard sample in front of them for cross-checking purposes?				
Are containers used for mixing paint or ink thoroughly cleaned before use and well covered?				
Are approved chemicals used to clean spray masks?				
Non-Conforming Products	**Yes**	**No**	**NA**	**Comments**
Are there established procedures for the identification, determination of quantity, segregation and disposition of non-conforming raw materials, packaging and finished products?				
Are non-conforming products segregated and identified?				
Are product hold records maintained?				
Are there verifiable established procedures to control the addition of re-work and ensure that the product conforms to safety specifications and product requirements?				
Are there records for the addition of re-work?				
Can batch records be reconciled with product dispositioned for re-work?				

INSPECTION	Yes	No	NA	Comments
Are batch lot inspections on products performed?				
Are there internal final inspections on products before shipments perform?				
Are formal written inspection reports completed?				
Are the inspectors given written procedures to follow?				
Is the product sample size for final inspection adequate to meet standards?				
Are defects isolated and analyzed to improve quality?				
Do quality control personnel and engineers review production samples to verify safety and quality compliance?				
Is mechanical testing documented?				
Are acceptable inspection reports required before authorization of shipment of the products? Do inspection procedures and records allow for effective tracing?				
Is the retention time of records specified?				
Is relevant information kept on file?				
Are quality meetings held as necessary and corrective actions notices distributed to key personnel?				
Does the product comply with the applicable end-buyer specifications standards and the applicable standards of the countries where it will be distributed?				
Is 100 percent inspection on function with appropriate set up performed?				

The next step after the self assessment is to review the information results with the the appropriate parties and communicate a corrective action plan where necessary.

SECTION 4.7: Social Standards Factory Audit Example

If an end buyer or distributor asks you for assurances that a product is produced in a socially compliant way, do you know what policies and procedures you need to implement? Do you know what standards to apply? To answer that question, you may need to conduct a conformity assessment of both the product and the production process.

The following is an example of a factory audit checklist for conformity with social standards:

Part 1

Randomly select X number of employees. Review all applicable records regarding payment, such as payroll records, pay stubs and time cards.

Figure 4.6:
Example Of A Self Assessment Checklist

MINIMUM WAGE	Yes	No	NA	Comments
Are hourly and piece rate employees paid at least the applicable minimum wage rate?				
Do wage rates paid match those documented in employee's files?				
Are wages paid properly calculated and meet minimum wage standard?				
Are all applicable withholdings properly calculated and withheld?				

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MINIMUM WAGE (con't)

	Yes	No	NA	Comments
Are there any impermissible payroll deductions?				
What is the lowest wage paid to any employee?				

OVERTIME

	Yes	No	NA	Comments
Are applicable overtime wages properly calculated?				
Are overtime wages paid same as documented in files?				

BENEFITS

	Yes	No	NA	Comments
Are deductions or withholdings for benefits calculated properly?				
Are deductions or withholdings for benefits submitted to the proper government authority within the time required by applicable law?				
Are legally required allowances and benefits provided to employees?				

Interview employees for whom records were selected. Verify above and:

- Is employee paid regularly?
- Is employee paid in cash?
- Is employee given pay stubs?
- Is employee required to perform work before or after hours?
- Is the employee given lunch or other breaks?

Part 2

Randomly select X number of employees. Select separate groups for each topic. Interview employees and verify status of items below. Note any exceptions and explain.

CHILD LABOR

	Yes	No	NA	Comments
What is the age of employee per official documents?				
What information is on file regarding the individual's employment at facility?				
What is the employee's physical appearance?				

FORCED LABOR

	Yes	No	NA	Comments
Is the relationship voluntary?				
Is the employee free to leave once his/her shift ends?				
Is the employee indebted to the company? For what?				
Is the employee bonded or indentured?				
Is the employee's freedom of movement restricted?				

HARASSMENT AND COERCION

	Yes	No	NA	Comments
Do supervisors threaten employees with violence?				
Do supervisors engage in verbal or psychological harassment or abuse?				
Do supervisors engage in sexual harassment or abuse?				
Do supervisors administer physical abuse?				

DISCRIMINATION

	Yes	No	NA	Comments
Has employee been discriminated against on the basis of race, religion, age, nationality, social or ethnic, gender or disability regarding:				
- Salary and benefits?				
- Advancement?				
- Job Assignment?				
- Discipline?				
- Termination?				
- Retirement?				

Part 3

CONDUCT HEALTH AND SAFETY OBSERVATIONS

	Yes	No	NA	Comments
Are exits clearly marked, unblocked and unlocked?				
Are aisles, exits and stairwells kept clear at all times?				
Is there acceptable clearance between workstations to allow movement in an emergency?				
Are fire escapes available in a multi-story facility?				
Is there an evacuation plan easily visible to employees?				
Is there first aid equipment near work areas?				
Are there fire extinguishers in appropriate locations?				
Are the fire extinguishers of a type appropriate for the fire risks?				
Are fire drills and evacuation drills conducted?				
Is personal protective equipment provided to workers?				
Are workers provided training on health and safety?				

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CONDUCT HEALTH AND SAFETY OBSERVATIONS (con't)				
	Yes	No	NA	Comments
Do employees have access to drinkable water?				
Are there clean and sanitary toilet areas?				
Is equipment properly safeguarded?				
Is equipment maintained to prevent fire or health hazards?				
Is ventilation adequate?				
Is lighting adequate?				
Is temperature adequate?				
Are hazardous chemicals and materials properly handled, stored and disposed?				
Are employees trained in such procedures?				

Part 4

CONDUCT ENVIRONMENTAL OBSERVATIONS				
	Yes	No	NA	Comments
Examine facility records for appropriate licenses, certificates, permits and insurance relating to health and safety.				
Interview employees regarding their observations and knowledge of environmental compliance.				
Observe facility for environmental problems.				

Part 5

CONDUCT GENERAL MANAGEMENT REVIEW				
	Yes	No	NA	Comments
Identify and document individuals responsible for payroll, employee relations, health and safety. Interview each regarding their responsibilities.				
Are all applicable records up to date and secure?				
Are there labor contracts with employees?				
Are there any worker organizations or committees within the facility?				
Does management understand our company's Code of Conduct?				

Further Reading On Production And Conformity Assessment:

CONE Communications/ECHO Global CSR Study
www.conecomm.com/research-blog/2015-cone-communications-ebiquity-global-csr-study

PPAI Social Responsibility Content
www.ppai.org/inside-ppai/corporate-responsibility/social-responsibility/

The International Labour Organization (ILO) www.ilo.org

Fair Labor Association (FLA) www.fairlabor.org/

PPAI Best Practices-Care Labels For Apparel:
www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/Documents/PR-BP-Care-Labeling-Apparel.pdf

PPAI Best Practices-Secondary Tracking Labels For Third Party Decoration Of Children's Apparel:
www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/Documents/PR-BP-Secondary-Tracking-Label.pdf

PART 5: Social Standards

Generally, when an end buyer indicates a preference for the purchase of a promotional product that meets social standards, the end buyer is referring to labor standards or working conditions under which a product is produced.

SECTION 5.1: History of International Labour Organization (ILO)

The common touchstone for most social standards is the **International Labour Organization (ILO), www.ilo.org**. The ILO is a "tripartite" United Nations agency that brings together representatives of governments, employers and workers to jointly shape policies and programs.

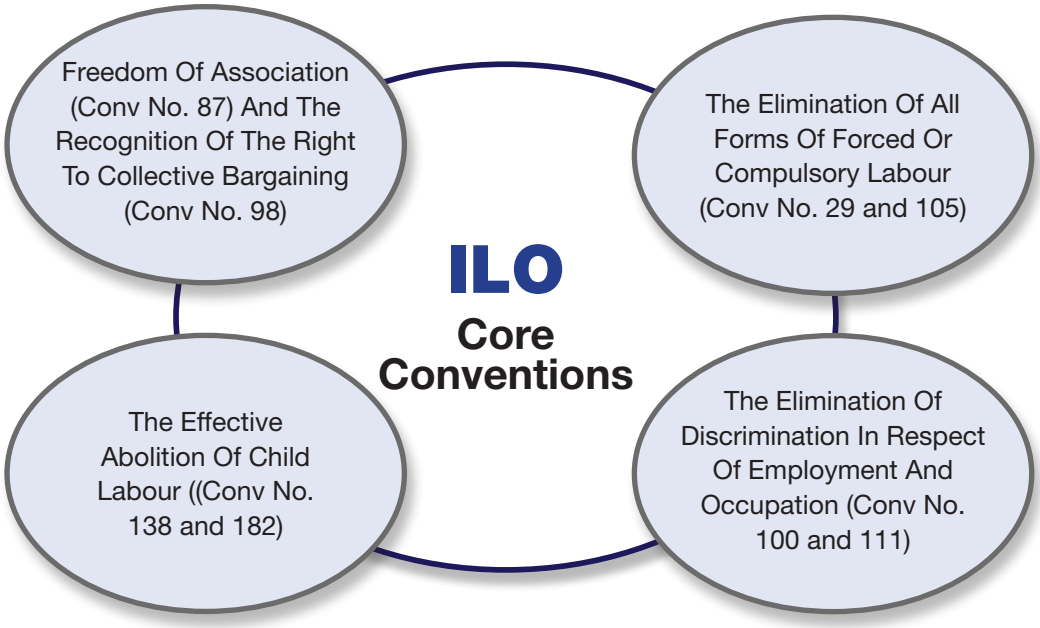
FIND OUT MORE ONLINE

Learn more about ILO's governing body on it's website.

The ILO adopts either conventions, which are legally binding international treaties that may be ratified by member states, or recommendations, which serve as non-binding guidelines. Once recommendation and conventions are adopted by the International Labour Conference and ratified by the the states, the ILO supervises their application.

For most business purposes, the eight conventions the ILO's governing body has identified as fundamental are the points of reference. These eight conventions that deal with four major issues: freedom of association, forced labour, prohibition of child labour and non-discrimination.

Figure 5.1:
ILO Core Conventions



FIND OUT MORE ONLINE

Download for free, ILO's *Rules Of The Game,* for a full explanation of these conventions and how to apply them.

Freedom of Association and Protection of the Right to Organise Convention, (No. 87)

"Workers' and employers' organizations shall organize freely and not be liable to be dissolved or suspended by administrative authority, and they shall have the right to establish and join federations and confederations, which may in turn affiliate with international organizations of workers and employers."

Right to Organise and Collective Bargaining Convention, (No. 98)

"Workers shall enjoy adequate protection against acts of anti-union discrimination, including requirements that a worker not join a union or relinquish trade union membership for employment, or dismissal of a worker because of union membership or participation in union activities. Workers' and employers' organizations shall enjoy adequate protection against any acts of interference by each other, in particular the establishment of workers' organizations under the domination of employers or employers' organizations, or the support of workers' organizations by financial or other means, with the object of placing such organizations under the control of employers or employers' organizations. The convention also enshrines the right to collective bargaining."

Forced Labour Convention, (No. 29)

Prohibits "all forms of forced or compulsory labour, which is defined as 'all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.' "

Abolition of Forced Labour Convention, (No. 105)

"Prohibits forced or compulsory labour as a means of political coercion or education or as a punishment for holding or expressing political views or views ideologically opposed to the established political, social or economic system; as a method of mobilizing and using labour for purposes of economic development; as a means of labour discipline; as a punishment for having participated in strikes; and as a means of racial, social, national or religious discrimination"

Minimum Age Convention, (No. 138)

"Sets the general minimum age for admission to employment or work at 15 years, 13 for light work, and the minimum age for hazardous work at 18, 16 under certain strict conditions. It provides for the possibility of initially setting the general minimum age at 14, 12 for light work, where the economy and educational facilities are insufficiently developed."

Worst Forms of Child Labour Convention, (No. 182)

"Defines as a 'child' a person under 18 years of age. It requires ratifying states to eliminate the worst forms of child labour, including all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict; child prostitution and pornography; using children for illicit activities, in particular for the production and trafficking of drugs; and work which is likely to harm the health, safety or morals of children."

Equal Remuneration Convention, (No. 100)

"Requires the application of the principle of equal remuneration for men and women workers for work of equal value. The term 'remuneration' is broadly defined to include the ordinary, basic or minimum wage or salary and any additional emoluments payable directly or indirectly, whether in cash or in kind, by the employer to the worker and arising out of the worker's employment."

Discrimination (Employment and Occupation) Convention, (No. 111)

"Defines discrimination as any distinction, exclusion or preference made on the basis of race, colour, sex, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation. It requires ratifying states to declare and pursue a national policy designed to promote, by methods appropriate to national conditions and practice, equality of opportunity and treatment in respect of employment and occupation, with a view to eliminating any discrimination in these fields."

SA8000:
An auditable certification standard that encourages organizations to develop, maintain, and apply socially acceptable practices in the workplace.

FIND OUT MORE ONLINE
Learn more about ILO labor standards and procedures.

FIND OUT MORE ONLINE
Click to read the UN's Universal Declaration of Human Rights.

SECTION 5.2: Social Accountability International (SAI)

The ILO conventions and recommendations have been taken a step further by the **Social Accountability International (SAI), www.sa-intl.org**. SAI's mission is to promote human rights for workers around the world as a standards organization, ethical supply chain resource and programs developer.

SAI promotes workers' rights primarily through its voluntary **SA8000 standard**. Based on the **ILO standards** and **U.N. Human Rights Conventions**, SA8000 is widely accepted as a viable and comprehensive international ethical workplace management system.

FIND OUT MORE ONLINE

SA8000 Standard is the central document of work at SAI. View it on their website.

The SA8000 standard's elements are:

Child Labour:

No workers under the age of 15; minimum lowered to 14 for countries operating under the ILO Convention 138 developing-country exception; remediation of any child found to be working

Forced Or Compulsory Labour:

No forced labor, including prison or debt bondage labor; no lodging of deposits or identity papers by employers or outside recruiters

Health And Safety:

Provide a safe and healthy work environment; take steps to prevent injuries; regular health and safety worker training; system to detect threats to health and safety; access to bathrooms and potable water

Freedom Of Association And Right To Collective Bargaining:

Respect the right to form and join trade unions and bargain collectively; where law prohibits these freedoms, facilitate parallel means of association and bargaining

Discrimination:

No discrimination based on race, caste, origin, religion, disability, gender, sexual orientation, union or political affiliation, or age; no sexual harassment

Disciplinary Practices:

No corporal punishment, mental or physical coercion or verbal abuse

Working Hours:

Comply with the applicable law but, in any event, no more than 48 hours per week with at least one day off for every seven day period; voluntary overtime paid at a premium rate and not to exceed 12 hours per week on a regular basis; overtime may be mandatory if part of a collective bargaining agreement

Remuneration (Compensation):

Wages paid for a standard work week must meet the legal and industry standards and be sufficient to meet the basic needs of workers and their families; no disciplinary deductions

Management Systems:

Facilities seeking to gain and maintain certification must go beyond simple compliance to integrate the standard into their management systems and practices.

FIND OUT MORE ONLINE

Click to find out more about being SA8000 certified.

FIND OUT MORE ONLINE

Complete list of SA8000-certified organizations.

Businesses have two options for SA8000 implementation according to the SAI: certification to SA8000 and participation in the Corporate Involvement Program (CIP).

Certification to SA8000:

Certification is the process by which facilities submit to an independent audit against the SA8000 Standard. If a facility meets the Standard, it will earn a certificate attesting to its social accountability policies, management and operations. Companies that operate production facilities can seek to have individual facilities certified to SA8000 through audits by one of the accredited certification bodies. SA8000 certification is conducted by organizations accredited and overseen by SAI's own auditors. Both certified and accredited organizations undergo semi-annual review and revisits.

SA8000 Corporate Involvement Program:

Companies that focus on selling goods or combine production and selling can join the SA8000 Corporate Involvement Program. The CIP is a two-level program that helps companies evaluate SA8000, implement the SA8000 Standard, and report publicly on implementation progress.

SA8000 Explorer (CIP Level One):

Evaluate SA8000 as an ethical sourcing tool via pilot audits.

SA8000 Signatory (CIP Level Two):

Implement SA8000 as a step-wise approach in some or all of the supply chain through certification and communicate implementation progress to stakeholders via SAI-verified public reporting."

Note:
Some facilities may require some pre-audit work, which is separate from the cost of certification. The cost for this work would depend entirely on the state of readiness for implementation of the SA8000 Standard at the facility.

A company could become SA 8000 Certified to provide additional assurances to others that promotional products are produced under widely accepted social conditions.

Assessment of compliance to the SA8000 Standard and the issuance of SA8000 certifications is available only through SAI-accredited, independent organizations. A facility wishing to seek certification to SA8000 must apply to an SAI-accredited auditing firm, known as a Certification Body. SAI recommends that facilities contact at least three of the SAI-accredited Certification Bodies to provide a bid for certification service. SAI does not set a specific amount for the cost of the certification process—the size, scope and location of the facility determines the number of days and auditors needed to conduct the audit at the facility, which affects the cost. In general, the costs typically range between $500-$1,500 per day, as determined by each individual Certification Body.

SECTION 5.3: The Value Of A Code Of Conduct

The Code of Conduct is the tangible presentation of what you are doing to meet the

expectations of the end buyer for product safety, social and environmental assurances. It is a statement of principles. It is what a supplier would hand to a distributor and what a distributor would hand to an end buyer when an end buyer expresses those expectations. It is your commitment.

Many end buyers, particularly larger businesses, have already adopted their own Code of Conduct. There is no specific law that requires a Code of Conduct, but there is remarkable similarity among those that have been adopted. Many of them draw from working conditions standards that have been put forth by various international entities, government as well as non-governmental, and discussed earlier or previously or already touched upon and possibly refer to the page or section above.. In addition, many of the Codes include statements on environmental, safety and quality commitments.

FIND OUT MORE ONLINE

Adopt the PPAI Code of Conduct.

Since a Code of Conduct is not mandatory, each company can compose its own Code of Conduct. End buyers are increasingly accustomed to seeing certain items in a Code of Conduct. For your convenience, we have provided a Code for our members to adopt that includes many of the common characteristics of existing codes.

The statement in the Code of Conduct does not obligate an employer to anything more than that which is already required under U.S. law. However, the statement is widely accepted as an international principle as explained in the chapter on social conditions and is commonly expected by end buyers. At the end of the day, it is up to you to decide what to include in your Code of Conduct.

Figure 5.3:
Code Of Conduct

(Company)'s Commitment To Ethical And Responsible Conduct

Our Company believes we must not only meet the expectations of our customers and consumers, we must exceed those expectations. To that end, we have adopted standards for the safety, quality and integrity of our products and processes and we are committed to respecting the rights of individuals and protecting the environment. We are dedicated to complying with all applicable laws and to conduct business in an ethical and responsible manner.

Product Safety

We will comply with all applicable laws and regulations regarding safety of products we sell. We will meet applicable recognized voluntary industry standards for our products and processes.

No Abuse Of Labor

We will not use any form of forced labor, including indentured, prison, bonded or slave labor. We will not use physical or verbal harassment or abuse to discipline employees.

No Child Labor

We will not use child labor. We will comply with all minimum age provisions of applicable laws and regulations.

Freedom Of Association

We respect the rights of employees to associate or organize, or join a union without fear of reprisal or interference. If employees are represented by a union recognized under law, we respect the right to bargain collectively.

continued on next page

No Discrimination
We will not discriminate in hiring and employment practices on the basis of age, nationality, race, religion, social or ethnic orientation, gender or disability.

Hours And Wages
We will comply with all applicable wage, work hours, benefits, and overtime laws and regulations. If local industry standards are higher than applicable laws and regulations, we will meet the higher standards.

Workplace Conditions
We will provide a safe, healthy and secure workplace. We will abide by all applicable laws and regulations for safety and health. Proper sanitation, lighting, ventilation and fire safety protection will be provided.

Environment
We abide by all applicable environmental laws and regulations. We will manage our environmental footprint to minimize the adverse impact on the environment. We will manage our energy, water and waste systems for maximum efficiency and minimal adverse impact on the environment.

Absence Of Applicable Laws And Regulations
In the absence of law in a particular location relating to product safety, labor, employment, environment or working conditions, the spirit and intent of these policies shall be met.

Subcontractors And Sources
We require all businesses that support our business as subcontractors, manufacturers or sources of goods to comply with all of the same policies stated in our Commitment to Ethical and Responsible Conduct Policy. All subcontractors and suppliers are required to comply with all applicable and national laws.

We expect those businesses to develop and implement internal business procedures to ensure compliance with our policy. We routinely monitor and assess compliance.

Further Reading On Social Standards:

The International Labour Organization (ILO): www.ilo.org
- ILO Labor Standards: www.ilo.org/global/standards/lang--en/index.htm
- ILO's Rules Of The Game: www.ilo.org/wcmsp5/groups/public/---ed_norm/---normes/documents/publication/wcms_318141.pdf
- ILO SA8000 Standard: www.sa-intl.org/index.cfm?fuseaction=Page.ViewPage&PageID=1463

Fair Labor Association (FLA): www.fairlabor.org/
The Social Accountability International (SAI): www.sa-intl.org
International Organization for Standardization (ISO): www.iso.org/iso/home.html
UN's Declaration Of Human Rights: www.un.org/en/documents/udhr/

PPAI Best Practices And Resources:

Social Compliance Basic Audit Checklist
www.ppai.org/inside-ppai/corporate-responsibility/social-responsibility/Documents/SR-BP-Basic-Audit.pdf

California Supply Chain Transparency
www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/Documents/PR-BP-California-Supply-Chain-Transparency.pdf

Adopt the PPAI Code of Conduct
www.ppai.org/inside-ppai/corporate-responsibility/social-responsibility/PPAI-Code-Of-Conduct

PART 6: Environmental Standards

SECTION 6.1: What It Means To Be Green

When an end buyer asks for a green product, the end buyer is generally referring to a broad set of expectations that are environmentally-friendly or ecologically-friendly. Sometimes a green claim can relate to a specific quality of the product and packaging, like “Made from recycled material”. Other specific green claims might be an energy-efficient production process that says the production is carbon-neutral or the product is bio-based, which means, the product utilizes biological products or renewable, domestic, agricultural (e.g., plant, animal and marine), or forestry materials.

There is no specific standard that is likely to encompass an end-buyer’s specific expectations. Indeed, a specific interest may actually contradict another ecologically friendly concept. For example, a desire to have a product made from recyclables may require a production process that results in a significant carbon footprint.

The **ISO 14000** has some standards for environmental management and strategies. They do not establish specific criteria but set forth principles to guide the process.

FIND OUT MORE ONLINE

Read more about ISO 14000 environmental management and strategies online.

SECTION 6.2: Federal Trade Commission

In 2011, the **Federal Trade Commission (FTC), www.ftc.gov**, reissued the ***Guides for the Use of Environmental Marketing Claims***, also known as *Green Guides* or *Guides*. These guides were first introduced in 1992, and revised in 1996 and 1998. The Guides set forth the FTC’s thinking about environmental claims, and are designed to help marketers avoid making environmental marketing claims that are unfair or deceptive. The Commission can take action under the **FTC Act** if a marketer makes an environmental claim inconsistent with the Guides.

FIND OUT MORE ONLINE

Download a copy of the FTC’s Green Guides.

The Guides apply to claims made by the manufacturer or distributor of an item about the environmental attributes of a product, package or service in connection with the marketing, offering for sale, or sale of such item or service to individuals, businesses or other entities. The Guides apply to all forms of marketing for products and services: advertisements, labels, package inserts, promotional materials, words, symbols, logos, product brand

FIND OUT MORE ONLINE

Explore the entire FTC Act on their website.

names and marketing through digital or electronic media, such as the internet or e-mail. They apply to any claim, express or implied, about the environmental attributes of a product, package or service in connection with the sale, offering for sale or marketing of a product, package or service for personal, family or household use, or for commercial institutional or industry use.

General Green Guides Principles:

Marketers must ensure that all interpretations of their claims are truthful, not misleading, and supported by a reasonable basis typically requiring competent and reliable scientific evidence.

Unless it is clear from the context, an environmental marketing claim should specify whether it refers to the product, the product's packaging, a service, or just to a portion of the product, package, or service.

To prevent deceptive claims, qualifications and disclosures should be clear, prominent, and understandable.

An environmental marketing claim should not overstate, directly or by implication, an environmental attribute or benefit.

Comparative environmental marketing claims should be clear to avoid consumer confusion about the comparison.

FIND OUT MORE ONLINE

Green Seal provides a list of products and how to get certified on it's website.

SECTION 6.3: Non-Governmental Organizations

There are some organizations that have their own certification programs and some standards (e.g., **Green Seal** and **Bluesign**); however, most of those certifications apply only to narrow categories of products.

FIND OUT MORE ONLINE

Visit Bluesign's to learn how they promote sustainable textile production.

SECTION 6.4: Environmental Protection Agency (EPA)

The **Environmental Protection Agency (EPA), www.epa.gov**, has identified positive attributes that it recommends other government agencies consider during procurement. However, the presence of the attributes alone does not qualify a product or service as an environmentally preferable option.

The EPA suggests looking for positive attributes such as:

- Recycled content/Recyclability
- Product disassembly potential
- Durability/Reusability
- Reconditioned or remanufactured
- Other attributes with positive environmental effects
- Take-back
- Bio-based
- Energy efficiency
- Water efficiency

FIND OUT MORE ONLINE

Read more about ISO 14000 environmental management and strategies online.

FIND OUT MORE ONLINE

ISO 14021
Environmental labels and declarations

ISO 14001
Environmental management systems

FIND OUT MORE ONLINE

ANAB provides a list of accreditied organizations on their website.

SECTION 6.5: ISO 14000 Series

Within the **ISO 14000 series**, **ISO 14021**- provides definitions of specific environmental labels claims such as those attributes listed by the EPA. The certification requirements for **ISO 14001** provide additional assurances to end buyers that the company is committed to addressing environmental concerns.

In order to become ISO Certified, a company would secure the services of a third-party certification body (CB) accredited by the ANSI-ASQ National Accreditation Board (ANAB).

The ANAB offers these suggestions when selecting a CB:

- ❑ Accreditation by a reputable body.
- ❑ Industry experience, background, and expertise.
- ❑ Recommendations from your clients or customers.
- ❑ References provided by the CB.
- ❑ Scheduling issues and ability to meet your time frame.
- ❑ All aspects of the CB fee schedule.
- ❑ Your comfort level in establishing a long term relationship with a CB.

Because ISO 14021 sets specifications regarding environmental claims, common terms such as green, eco-friendly, environmentally safe and the like are not acceptable for an ISO 14021 certified company. The standard contains general requirements regarding “self-declared” claims and verification of those claims in order to ensure truthfulness and avoid misleading the consumer.

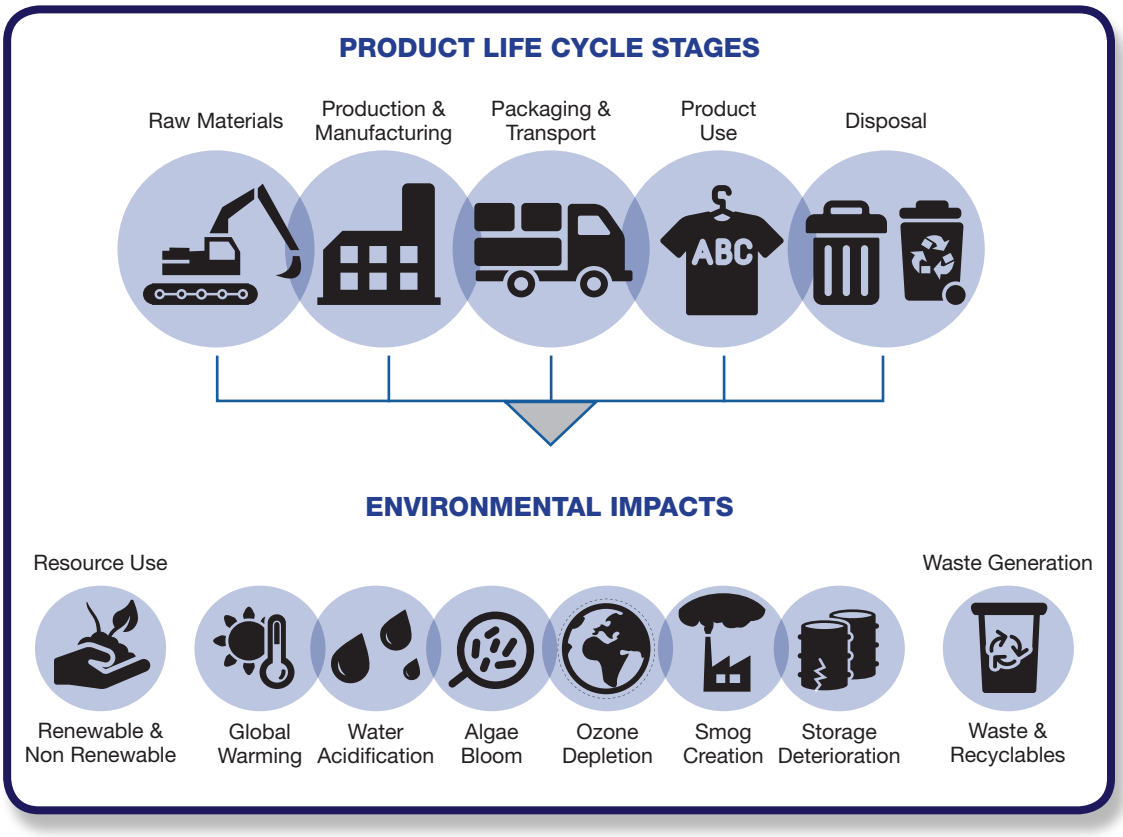
As a result, an ISO 14021 accredited company would provide detailed claims in lieu of vague terms. These would be based base any environmental claims on thorough and comprehensive scientific methodology. Under the standard all information, criteria and results regarding the claim would be available upon request.

SECTION 6.6: Carbon Footprint

In recent years, there has been much discussion in the media about carbon footprint. Generally, a carbon footprint is a measurement of the amount of carbon dioxide (CO_2) emitted by an activity or over the product’s life cycle.

The life cycle assessment, commonly referred to as “cradle to grave,” entails comprehensive examination of a product’s environmental and economic aspects and tracks a product from the extraction of the various raw materials through the production and sale to use of the product, and, finally, its disposal. Transportation of the raw materials, the product and the waste is included and measured. ISO 14040:2006 and 14044 deal with life cycle assessment.

Figure 6.6a:
Life cycle assessment



Life cycle assessment:
A tool for the systematic evaluation of the environmental aspects of a product or service system through all stages of a products life cycle.

They are the accepted standards for life based environmental assessments across the globe.

The ISO 14040 standard

Addresses "framework" for life cycle assessment (LCA) studies and life cycle inventory (LCI) studies. The results of these studies are to be incorporated into the organization's environmental responsibility goal and scope. However, application of LCA and LCI fall outside this standard.

The ISO 14044 standard

Addresses the requirements and guidelines for the technical application of LCA and LCI.

CO_2e:
A standard unit for measuring carbon footprints. The idea is to express the impact of each different greenhouse gas in terms of the amount of CO_2 that would create the same amount of warming.

Compliance with these standards may provide end buyers with assurances that all steps are being taken to reduce a product's carbon footprint. Another option to reduce a product's carbon footprint is offset technology. The World Resources Institute defines a carbon offset as "a unit of carbon dioxide-equivalent, **CO_2e**, that is reduced, avoided, or sequestered to compensate for emissions occurring elsewhere".[1]

[1]Goodward, Jenna; Kelly, Alexia (August 2010). "Bottom Line on Offsets". World Resources Institute. Retrieved 2010-09-08.

There are non-governmental organizations, nonprofits, and commercial enterprises that offer plans to allow you to offset the carbon footprint of your products. The US Environmental Protection Agency (EPA) offers this advice:

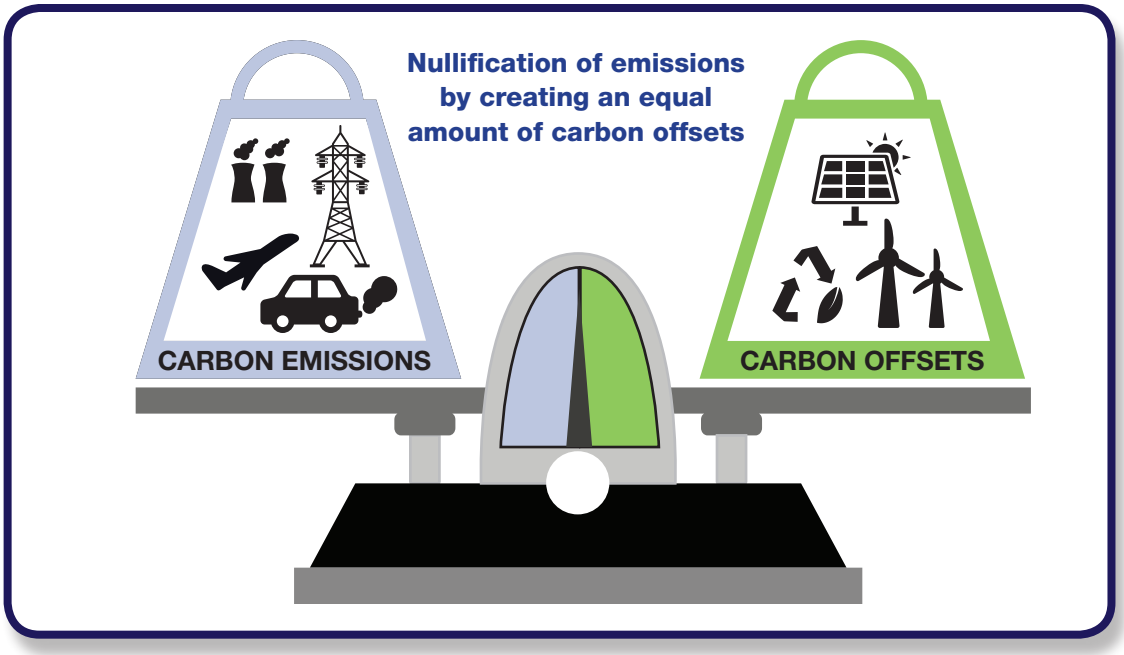
> "Renewable energy is electricity generated by fuel sources that restore themselves over a short period of time and do not diminish. Although some renewable energy technologies have an impact on the environment, renewables are considered environmentally preferable to conventional sources and, when replacing fossil fuels, have significant potential to reduce greenhouse gas emissions."
>
> https://www.epa.gov/statelocalclimate

> "State and local governments have an important role to play in advancing clean energy and reducing greenhouse gas emissions that contribute to climate change. Governments can lead by example by implementing programs within their own buildings, operations, and procurement policies that reduce greenhouse gas emissions and save energy and money."
>
> https://www3.epa.gov/climatechange/basics/

> "Driving a car, using electricity to light and heat your home, and throwing away garbage all lead to greenhouse gas emissions. You can reduce emissions through simple actions like changing a light bulb, powering down electronics, using less water, and recycling."
>
> www.epa.gov/climatechange/wycd/

The EPA site provides several steps steps citizens and businesses can take to protect the climate, reduce air pollution, and save money.

Figure 6.6b:
How CO_2 Offset Works



FIND OUT MORE ONLINE

List of domestic carbon offsetting examples from EnergyStar.

FIND OUT MORE ONLINE

Explore the NATF environmental trends and opportunities for additional ideas.

Kyoto Protocol: an international treaty, which extends the 1992 United Nations Framework Convention on Climate Change (UNFCCC) that commits State Parties to reduce greenhouse gases emissions, based on the premise that (a) global warming exists and (b) man-made CO2 emissions have caused it.

Some offset schemes may involve planting trees but it can take many years for the environmental benefits to be realized—and it is difficult to measure how much carbon is actually saved. Renewable energy and energy efficiency projects can be good projects to support as these can have immediate benefits to the environment. There are many different types of carbon offsetting projects.

Examples Of Carbon Offsetting Projects:

- Providing people in Aceh, Indonesia, with newly developed solar cookers and heat retention containers for cooking, heating, sterilizing water, and preserving food
- Implementing energy efficiency measures at a resort-hotel in India
- Harnessing run of river, without dams, hydropower in Fiji
- Establishing the first wind energy plant in Cyprus
- Collecting methane to generate electricity from landfill sites in Durban, South Africa
- Generating electricity from the bagasse residue produced by a sugar mill in Ecuador

According to the United Nations (UN), "emissions trading schemes may be established as climate policy instruments at the national level and the regional level. Under such schemes, governments set emissions obligations to be reached by the participating entities. The European Union emissions trading scheme is the largest in operation."

When purchasing offsets you should look out for Certified Emissions Reductions (CERs) to ensure that they receive recognized and reputable credits. CERs are verified by the UN and meet the requirements of the Kyoto Protocol.

SECTION 6.7: Environmental Responsibility Best Practices

There are certain standards and best practices that should be adopted by industry practitioners that will minimize adverse impact on environmental resources and protect the community.[2]

Obtain and maintain all required environmental permits, approvals and registrations. Reduce or eliminate waste of all types by evaluating production methods, facility maintenance, materials substitution, conservation, recycling and re-using materials.

Identify and manage chemicals and other materials posing a hazard if released to the environment.

Monitor, control and treat wastewater and solid waste generated from operations, industrial processes and sanitation facilities prior to discharge or disposal.

[2]Source: Electronic Industry Citizenship Coalition (EICC) Code of Conduct, http://www.eiccoalition.org/standards/code-of-conduct/

Monitor, control and treat air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations.

Follow all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.

Further Reading On Environmental Standards:

PPAI Environmental Responsibility Site:
www.ppai.org/inside-ppai/corporate-responsibility/environmental-responsibility/

The Federal Trade Commission (FTC): www.ftc.gov

FTC Act: www.ftc.gov/enforcement/statutes/federal-trade-commission-act

FTC Green Guides: www.ftc.gov/news-events/media-resources/truth-advertising/green-guides

The Environmental Protection Agency (EPA): www.epa.gov/

ISO 14000 Environmental Standards: www.iso.org/iso/home/standards/management-standards/iso14000.htm

ISO 14001 Environmental Management Systems:
www.iso.org/iso/home/store/catalogue_ics/catalogue_detail_ics.htm?csnumber=60857

ISO 14021 Environmental Labels And Declarations:
www.iso.org/iso/home/store/catalogue_ics/catalogue_detail_ics.htm?csnumber=66652

ANAB List Of Accredited Organizations: http://anab.org/

NATF Environmental Trends: www.unepfi.org/fileadmin/documents/greenprods_01.pdf

PART 7: Federal Regulation And Enforcement

FIND OUT MORE ONLINE

- Consumer Product Safety Act
- Federal Hazardous Substances Act
- Flammable Fabrics Act
- Poison Prevention Packaging Act
- Refrigerator Safety Act

SECTION 7.1: Consumer Product Safety Commission

As of 2015, the **U.S. Consumer Product Safety Commission (CPSC), www.cpsc.gov**, has jurisdiction over about 15,000 types of consumer products. The CPSC draws its authority from five statutes:

Consumer Product Safety Act (CPSA) **Poison Prevention Packaging Act (PPPA)**

Flammable Fabrics Act (FFA) **Refrigerator Safety Act (RSA)**

Federal Hazardous Substances Act (FHSA)

CPSA

Enacted in 1972, established the Commission, defines its basic authority, and provides that when the CPSC finds an unreasonable risk of injury associated with a consumer product it can develop a standard to reduce or eliminate the risk. The CPSA also provides the authority to ban a product if there is no feasible standard and it gives CPSC authority to pursue recalls for products that present a substantial product hazard.

FHSA

The FHSA requires that certain hazardous household products,hazardous substances, bear cautionary labeling to alert consumers to the potential hazards that those products present and to inform them of the measures they need to take to protect themselves from those hazards. Any product that is toxic, corrosive, flammable or combustible, an irritant, a strong sensitizer, or that generates pressure through decomposition, heat, or other means requires labeling. If the product may cause substantial personal injury or substantial illness during or as a proximate result of any customary or reasonable foreseeable handling or use, including reasonable foreseeable ingestion by children.

Note:
The CPSA and FHSA are the most frequently invoked authorities.

The FHSA gives the Commission authority to ban by regulation a hazardous substance if it determines that the product is so hazardous that the cautionary labeling required by the act is inadequate to protect the public. Any toy or other article that is intended for use by children and that contains a hazardous substance is also banned under the FHSA if a child can gain access to the substance. In addition, the Act gives the Commission authority to ban by regulation any toy, or other article intended for use by children that presents a mechanical, electrical or thermal hazard.

SECTION 7.2: Reporting

Under the CPSA, there are three principal reporting requirements. Any manufacturer, importer, distributor or retailer of consumer products must notify CPSC immediately if it could be concluded that one of its products:

- Has a defect that creates a substantial risk of injury to the public;
- Creates an unreasonable risk of serious injury or death; or
- Violates a consumer product safety standard or ban of the product.

A manufacturer must report to the CPSC when any of its consumer products has been involved in three or more lawsuits in a two-year period. Each lawsuit must have alleged death or grievous bodily injury and resulted in a settlement or a court judgment in favor of the person who filed the suit. A manufacturer, distributor, retailer or importer of marbles, small balls, latex balloons or toys or games that contain such items must report to CPSC any incidents of children choking on those items.

FIND OUT MORE ONLINE

Need to know more about injuries for a specific product? Check out the NEISS system on the CPSC website.

The National Electronic Injury Surveillance System (NEISS) monitors patients who come into 100 hospital emergency rooms nationwide. From it the CPSC develops statistical estimates of product-related injuries. Last year the NEISS system developed reports on product-related injuries from more than 410,000 emergency room visits.

SECTION 7.3: Enforcement

In addition to acting on the reports required by the law, the CPSC enforces existing regulations and laws by conducting both domestic surveillance through inspections of the regulated industry and import surveillance at ports of entry and following up on injury reports, consumer complaints, trade complaints or other allegations or indications that a firm is manufacturing or distributing a consumer product not in compliance with the law.

Under the CPSA, any person who knowingly violates the CPSA is subject to a civil penalty not to exceed $8,000 for each violation. Under the FHSA, the Commission may seek a civil penalty of up to $8,000 per violation product, up to a maximum of $1.825 million for any related series of violations. There are criminal penalties and the CPSC can seek injunctive relief or seize products.

Where appropriate, based on the nature of the hazard and the likelihood of injury associated with the non-complying product, the CPSC staff will request that the firm recall the product from the marketplace, including consumers who already own the product. It may provide for the return of a product to the manufacturer or retailer for a cash refund or a replacement product; for the repair of a product, and/or for public notice of the hazard.

FIND OUT MORE ONLINE

View the CPSC list of products that have received a LOA.

Once the CPSC staff determines a product violates a specific statute or regulation, CPSC staff generally notifies the responsible firm, the product manufacturer, importer, distributor or retailer. Notification to the responsible firm is usually in the form of an official letter, referred to as a Letter of Advice (LOA).

While the CPSC has the authority to require a mandatory product recall, due to the lengthy and costly nature of the proceeding that it must undertake in order to issue such a recall, the majority of the recalls are voluntary on the part of the recalling firm, the details of which

FIND OUT MORE ONLINE

Learn more about the CPSC's Fast Track system on their website.

the CPSC negotiates with that firm, generally after a significant exchange of information between the firm and the CPSC.

The majority of recalls are initiated under a **"Fast Track" recall program**. Under this program the subject firm agrees to initiate a recall within 20 days after being contacted by the CPSC, generally in exchange for the lack of a formal finding by the CPSC that a product is defective and a substantial product hazard exists.

In calendar year 2014, the CPSC announced 715 recalls of defective products, representing more than 120 million individual products. Other corrective actions, short of a recall, including modifying the product, issuing a consumer warning, or through other means were ordered for more than 300 products directly involving a risk of injury to children.

FIND OUT MORE ONLINE

Download a copy of the CPSC's *Regulated Products Handbook*.

The CPSC publishes a comprehensive guide, entitled ***Regulated Products Handbook***.

SECTION 7.4: Recall Handbook

The CPSC also publishes a comprehensive handbook on recalls. ***The Recall Handbook*** is a useful tool for identifying potential problems and actions a company might want to take on a voluntary proactive basis when a potential problem has been identified.

FIND OUT MORE ONLINE

Download a copy of the CPSC's *Recall Handbook*.

Some of the questions a company must be prepared to answer in the event of a potential recall:

- ❑ What is the defect that causes the product hazard?
- ❑ What caused the product defect to occur in the first place?
- ❑ Where are the unsafe products? How many are there?
- ❑ Did the product fail to comply with government safety regulations? How?
- ❑ Was the government or the appropriate regulatory body informed about the defect or lack of compliance?
- ❑ Has the company discontinued production and shipment of these products to others in the distribution channel?
- ❑ Has the company notified those selling the product to stop selling the product and asked them to help identify consumers who own the product?
- ❑ Has the company started reviewing existing databases to identify potential product owners, e.g., product registration and customer service records?
- ❑ Has a press release been prepared announcing the recall? What other forms of public notice are needed?
- ❑ Has a toll-free telephone service been set up that will be able to handle the number of calls expected after the recall is announced?
- ❑ What is the company's estimate of the cost of the product recall campaign?

FIND OUT MORE ONLINE

Looking for more suggestions? Download a copy of the CPSC's *Recall Checklist*.

- ❑ Is the company prepared to deploy manpower and/or fund an effort to provide replacement parts for defective products or to exchange them for new products that do not have the problem?
- ❑ Has a plan been developed to ship replacement parts or new units to others in the distribution channel participating in the product recall, or otherwise repair units in their inventory?
- ❑ Is the company prepared to monitor the product recall and provide timely reports to the Commission on the progress of the recall?
- ❑ How is the company upgrading its quality control or risk analysis procedures to prevent a similar product recall in the future?

Further Reading On Federal Regulation Of Consumer Products:

Consumer Product Safety Commission (CPSC): www.cpsc.gov

- Consumer Product Safety Act (CPSA): www.cpsc.gov/PageFiles/105435/cpsa.pdf
- Federal Hazardous Substances Act (FHSA): www.cpsc.gov/en/Business--Manufacturing/Business-Education/Business-Guidance/FHSA-Requirements/
- Flammable Fabrics Act (FFA)
- Poison Prevention Packaging Act (PPPA): www.cpsc.gov/en/Regulations-Laws--Standards/Statutes/Poison-Prevention-Packaging-Act/
- Refrigerator Safety Act (RSA): www.cpsc.gov//Global/PDF/Statues/rsa.pdf
- National Electronic Injury Surveillance System (NEISS): www.cpsc.gov/en/Research--Statistics/NEISS-Injury-Data/
- CPSC's Fast Track Recall Program www.cpsc.gov/en/Business--Manufacturing/Recall-Guidance/CPSC-Fast-Track-Recall-Program/
- CPSC Regulated Products Handbook: www.cpsc.gov//Global/Business-and-Manufacturing/Business-Education/RegulatedProductsHandbook.pdf
- CPSC Recall Handbook: www.cpsc.gov//PageFiles/106141/8002.pdf

PPAI Best Practices And Resources:

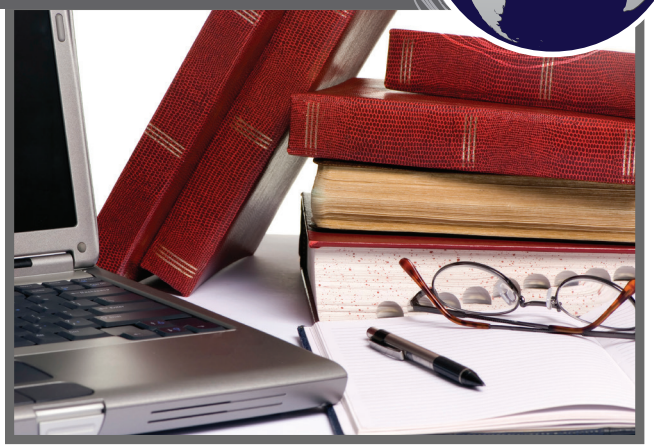
PPAI's Best Practices:
http://www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/bestpractices

Product Recall Preparedness:
http://www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/Documents/PR-BP-Recall-Preparedness.pdf

PPAI's Product Recall Manual:
http://www.ppai.org/inside-ppai/corporate-responsibility/product-responsibility/Documents/PR-Recall-PPAI-Product-Recall-Manual.pdf

PART 8: Product Liability

Product liability:
The legal liability a manufacturer or trader incurs for producing or selling a faulty product.



SECTION 8.1: Law

"Product liability" is a broad term that encompasses many difference standards of responsibility for a product. For the most part, it is a matter of state law and state court-made law, also known as common law, both vary from state to state. Generally, the claims are based on negligence, strict liability or a breach of warranty of fitness. Most often, product liability claims are based on a defective product, which could be a design defect or manufacturing defect or sometimes a marketing defect, in the latter case improper instructions or failures to warn.

While the goal is not to be defending against a product liability claim in a court, the more practical concerns are addressing the allocation of liability by contract and managing risk through insurance.

SECTION 8.2: Contracts And Language

In the context of contractual obligations, many legal terms are frequently linked to any discussion of product responsibility. Defend, indemnify and hold harmless, are frequently used in conversation interchangeably, but have slightly different meanings. They are frequently found together in the same contract provision.

An agreement to defend

When one party to the agreement agrees to pay the fees the other party incurs for representation against claims and lawsuits.

Some of the issues the come into dispute include:

- When does the obligation arise?
- What is a claim?
- Does the obligation include all litigation costs and experts?
- Who chooses the representation?

An agreement to indemnify

When one party to the agreement agrees to pay for the other party's financial losses such as settlement costs, court awards and other specific expenses. Most of the issues in this situation relate to the financial losses.

An agreement to hold harmless

When one party to the agreement agrees that the other party will be freed of any liability resulting from the sale or use of the products. In some respects, this is the most confusing of the three. The issue is whether the party agreeing to hold the other party harmless is relinquishing its own claims against the other party or agreeing to hold the other party harmless from the claims of others.

A typical provision reads as follows:

"X shall defend, indemnify and hold harmless Y from and against any and all demands, claims, actions, legal proceedings, damages, liability, costs and expenses of whatsoever kind and nature (including reasonable attorneys' fees) arising out of or related to sale or use of the promotional products."

A waiver or release of liability

is the opposite side of the coin. It means one party gives up the right to pursue the protections afforded by the duty to defend, indemnification and hold harmless. Technically, the waiver is an agreement not to pursue a right, while the release is giving up the right, but they are essentially equivalents.

Typical simple examples of provisions read as follows:

"Y hereby releases X from any liability from demands, claims, actions, legal proceedings, damages, liability, costs and expenses of whatsoever kind and nature (including reasonable attorneys' fees) arising out of or related to sale or use of promotional products."

"Y hereby waives its right to any and all demands, claims, actions, legal proceedings, damages, liability, costs and expenses of whatsoever kind and nature (including reasonable attorneys' fees) arising out of or related to sale or use of the promotional products."

The waiver or release generally is limited to the two parties. For example, if the supplier wishes protection from end buyers, it would seek the indemnification, defend and hold harmless provision from a distributor, not a waiver or release.

Warranties and representations

address a variety of concerns from intellectual property authorization to fitness for purpose. To reaffirm the obligation of a party as it relates to product responsibility, clauses could be added to the warranties and representations.

Typical simple examples of such provisions read as follows:

"X represents and warrants that products subject to this agreement comply with all applicable United States and States' laws currently in force."

"X represents and warrants that products subject to this agreement were produced in compliance with all applicable national and local labor and environmental laws."

Sometimes, warranties and representations include references to specific law or requirements:

"X represents and warrants that products subject to this agreement comply with all applicable United States and States' laws currently in force including but not limited to the Consumer Product Safety Act (CPSA) and the Federal Hazardous Substances Act (FHSA)."

"X represents and warrants that all products subject to this agreement were produced in facilities that meet standards of social accountability including: no form of forced labor including indentured, prison, bonded or slave labor; no use of physical or verbal harassment or abuse to discipline employees; no child labor; respect for the rights of employees to associate, or organize or join a union without fear of reprisal or interference; no discrimination in hiring and employment practices on the basis of age, nationality, race, religion, social or ethnic orientation, gender or disability; compliance with all applicable wage, work hours, benefits, and overtime laws and regulations; provision of a safe, healthy and secure workplace; and provision of proper sanitation, lighting, ventilation and fire safety protection."

SECTION 8.3: Product Liability Insurance

Any party in the product delivery channel may want to obtain product liability insurance. Most businesses have a commercial general liability (CGL) policy, which may cover some aspects of a claim related to a product injury. A product liability policy is a separate policy or an additional endorsement on a CGL that specifically covers product-related claims.

commercial general liability:
is coverage that will protect your business in the event that you are sued. CGL coverage is designed to protect against claims bodily injury or property damage.

It is important to know what is covered and what is not covered. In product liability insurance, consider the following:

Does the policy cover you if there are violations of specific safety laws or specific risks (e.g. lead poisoning)?

- If it is excluded, you may need to ask for a rider for additional coverage.

Some policies cover only situations in which the injury occurs and a claim is made while the policy is still in force.

Are there aggregate limits?

Typically, a distributor would seek to be added to a supplier's policy. Most policies have aggregate limits, so if there is a claim or claims, the amount the insurer will pay on behalf of any or all of the insured is limited to one overall amount; each of the insured is not covered up to the limit of the policy.

Some insurance companies now offer product recall insurance that covers expenses related to product recalls. If you are evaluating this insurance, please consider:

What constitutes a recall?

Is it a voluntary or a government-mandated recall?

Whose expenses are covered? Just the insured or other parties as well?

What is the cost associated with such a policy?

SECTION 8.4: Imported Products

While agreements can be enforced against foreign manufacturers and foreign manufacturers can be sued for product liability claims, for all practical purposes, end buyers want the assurance that there is someone in the United States who accepts responsibility for a product. It is possible that you will spend extra time and resources on initiating litigation in another country and frequently the laws do not favor an out of country plaintiff.

SECTION 8.5: Best Practices When Sourcing Products

The importer should seek contractual assurances from a foreign source including duty to defend, indemnification and hold harmless as well as warranties and representations

The importer should require the foreign source to have U.S. insurance:

> *"X agrees to obtain and maintain in effect during the entire period of this agreement and for a period of (number) years after the termination thereof, a commercial general liability insurance policy with a limit of not less than ($ amount) for each occurrence underwritten by a United States insurer."*

If insurance cannot be secured, at least request a certificate of insurance from the foreign source's insurance company. This will provide you with the details of their coverage.

Require the foreign source to accept the jurisdiction of U.S. courts if a claim involving its products is filed.

Glossary Of Terms

Accreditation: recognition by an independent accrediting body, that a certification body adheres to specific standards.

American Society For Testing and Materials (ASTM): Founded in 1902, one of the oldest SDOs and now produces the largest number of non-governmental, voluntary standards in the United States and many are used worldwide. It is the source of many of the product lines of interest to the promotional products industry.

ASTM F963: a mandatory requirement for toys while the Consumer Product Safety Commission (CPSC) studies the effectiveness of the standard and issues final consumer guidelines for toy safety.

Basic Standard: has a broad ranging effect in a particular field, such as a standard for metals that affects a range of products from cars to screws.

Carbon Dioxide-equivalent (CO_2e): A standard unit for measuring carbon footprints. The idea is to express the impact of each different greenhouse gas in terms of the amount of CO2 that would create the same amount of warming.

Carbon Footprint: the amount of carbon dioxide and other carbon compounds emitted due to the consumption of fossil fuels by a particular person, group, etc.

Carbon Offset: a unit of carbon dioxide-equivalent, CO2e, that is reduced, avoided, or sequestered to compensate for emissions occurring elsewhere.

Certification Of Conformity/Certification Marks/Marks Of Conformity: document issued under the rules of a certification system, providing confidence that a duly identified product, process, or service is in conformity with a specific standard or other normative document.

Certification: the process of providing assurance that a product conforms to a standard or specification or that an organization and/or individual is competent to perform a certain task.

Children's Product: A consumer product that is designed or intended for use by children 12 years of age or younger.

Children's Toy: A consumer product designed or intended by the manufacturer for a child 12 years of age or younger for use by the child when the child plays.

Code Of Conduct: a set of rules outlining the social norms and rules and responsibilities of, or proper practices for, an individual, party or organization. Related concepts include ethical, honor, moral codes and religious laws.

Commercial General Liability: is coverage that will protect your business in the event that you are sued. CGL coverage is designed to protect against claims bodily injury or property damage.

Conformity Assessment: Process of determining whether someone or something meets the requirements of a standard.

Consumer Product Safety Commission (CPSC): A U.S. government agency that protects the American public from products that may create a potential hazard to safety.

Consumer Product Safety Improvement Act (CPSIA): Signed into law on Aug. 14, 2008. It is designed to allow The CPSC to better regulate the safety of products made and imported for sale in the U.S.

Consumer Product: Any article, or component part thereof, produced or distributed for sale to a consumer for use in or around a permanent or temporary household or resident, a school, in recreation, or otherwise, or for the personal use, consumption or enjoyment of a consumer in or around a permanent or temporary household or residence, a school, in recreation or otherwise.

Data Requirement Standard: provide necessary values for a product or service.

Environmental Protection Agency (EPA): an agency of the United States federal government whose mission is to protect human and environmental health.

Federal Hazardous Substances Act: Public law that requires that certain hazardous household products ("hazardous substances") bear cautionary labeling to alert consumers to the potential hazards that those products present and to inform them of the measures they need to protect themselves from those hazards.

Federal Trade Commission (FTC): a federal agency, established in 1914, that administers antitrust and consumer protection legislation in pursuit of free and fair competition in the marketplace.

Federal Trade Commission Act: An independent federal agency whose main goals are to protect consumers and to ensure a strong competitive market by enforcing a variety of consumer protection and antitrust laws.

First Party Certification: an individual or organization providing the good or service offers assurance that it meets certain claims.

Food and Drug Administration (FDA): A federal agency in the Department of Health and Human Services established to regulate the release of new foods and health-related products.

Guides For The Use of Environmental Marketing Claims (Green Guides): FTC's thinking about environmental claims, and are designed to help marketers avoid making environmental marketing claims that are unfair or deceptive.

Inspection: conformity evaluation by observation and judgment accompanied as appropriate by measurement, testing or gauging.

Interface Standards: concern the compatibility of products.

International Labour Organization (ILO): a "tripartite" United Nations agency that brings together representatives of governments, employers and workers to jointly shape policies and programs.

International Organization for Standardization (ISO): a non-governmental organization that promotes the development of standardization and related activities to facilitate the international exchange of goods and services, and to develop cooperation in intellectual, scientific, technological, and economic activity.

ISO SA8000: An auditable certification standard that encourages organizations to develop, maintain, and apply socially acceptable practices in the workplace.

Kyoto Protocol: an international treaty, which extends the 1992 United Nations Framework Convention on Climate Change (UNFCCC) that commits State Parties to reduce greenhouse gases emissions, based on the premise that (a) global warming exists and (b) man-made CO2 emissions have caused it.

Life cycle Assessment: A tool for the systematic evaluation of the environmental aspects of a product or service system through all stages of a products life cycle.

Manufacturer's Self-Declaration Of Conformity: when a manufacturer or supplier attests to the fact that his or her product meets one or more standards.

Process standards: specify requirements to be met by a process, such as a manufacturing line's operation, in order to function effectively.

Product Liability: The legal liability a manufacturer or trader incurs for producing or selling a faulty product.

Product Life cycle: the cycle through which every product goes through from introduction to withdrawal or eventual demise.

Product Standards: establish qualities or requirements for a product, or related group of products, to assure that it will serve its purpose effectively.

Second Party Certification: an association to which the individual or organization belongs provides the assurance.

Service Standards: establish requirements to be met to achieve the designated purpose effectively.

Standard Developing Organizations (SDO): refers to the thousands of industry- or sector-based standards organizations that develop and publish industry specific standards.

Standard: A prescribed set of rules, conditions or requirements concerning definitions of terms; classification of components; specification of materials, performance, or operations; delineation of procedures; or measurement of quantity and quality in describing materials, products, systems, services, or practices.

Terminology Standards: define words permitting representatives of an industry to use a common, clearly understood language.

Testing Standards: define the test methods to be used to assess the performance or other characteristics of a product.

Third-Party Certification: process by which the producer's claim of conformity is validated by a technically and otherwise competent third party, a body not controlled by or under the influence of the producer or buyer.

Voluntary Standard: safety standards developed through collaboration and research of best safety practices.