Product Responsibility Best Practices

SUBJECT	LAST UPDATE
Component Part Testing	July 2019

APPLIES TO
- Suppliers
- Distributors
- Third-party Decorators

FOCUS ON
Finding and Working with a Testing Lab

Intended for intermediate compliance programs

QUICK LINKS
- PPAI Corporate Responsibility: http://ppai.org/corporate-responsibility
- UL: industries.ul.com/premiums-promotional-and-licensed-goods
- Consumer Product Safety Commission: www.cpsc.gov

Italic grey text indicates a hyperlink listed in the Online Resources section of this document.

Background

The *Consumer Product Safety Improvement Act of 2008 (CPSIA)* mandates that all children's products undergo third-party testing. Compliance with this mandatory third-party testing can be costly. To mitigate the cost associated with third-party testing, the *Consumer Product Safety Commission (CPSC)* introduced the *Component Part Testing Rule.*

Component Part Testing Rule

The component part testing policy allows domestic manufacturers and importers to certify compliance of children's products either by:

(1) conducting their own third-party testing by a CPSC accepted testing lab verifying that the materials and surface coatings on the product comply with the CPSIA limits, or

(2) by having conformity certificates from the surface coatings (e.g. ink/paint) and component suppliers that are based on results of applicable and mandatory tests performed by a CPSC-accredited third-party lab declaring compliance of each material and surface coating used for the product. This conformity certificate can cover multiple batches or lots of products.

In order to rely upon test results or a certification from a supplier, the rule requires that you use due care to ensure that the certificate is valid, and you are provided access to the underlying documentation, such as test results and attestations, regarding how the testing was conducted and by whom.

Generally, certifications of a component part must satisfy the requirement for a *Children's Product Certificate*, and must be based on the results of testing from a laboratory whose accreditation has been accepted by the CPSC. In addition, there must be traceability of the component to the finished product, and there must be no potential for contamination during the manufacturing process.

Component testing may be performed for chemical tests such as lead and other heavy metals in surface coatings and substrate materials. Component testing is not appropriate for mechanical tests, flammability tests, or other tests where the final assembled product is needed to determine compliance.

Benefits of component testing

- Component testing can reduce redundant testing. For example, if an identical button is used on five styles of children's sweaters, the button can be tested once as a component part rather than tested five times (when each of the five styles of sweaters is individually tested).
- Component testing can also identify compliance failures early on in the product development process; by testing a component before it is incorporated into the finished product will save a lot of time, expense and aggravation for the supplier and clients.
- Component testing may offer marketing and sales advantages to many component suppliers who

can promote the sale of pre-certified, CPSIA-compliant products. With component testing, though, it is critical that the supplier establishes and maintains adequate procedures and practices to ensure good traceability of the component part to the finished product, and to ensure that manufacturing processes do not contaminate the component.

- In most cases, if all of the individual, accessible parts of a product are tested for restricted or banned chemicals and substances (e.g., lead, cadmium, heavy metals, phthalates, etc.), those chemical test results can represent testing of the entire product. Note that a certificate must be issued for the finished product based on the component testing.

Online Resources:

CPSC Age Determination Guidelines:
https://www.cpsc.gov/s3fs-public/DRAFT%20Age%20Determination%20Guidelines%20for%20Toys.pdf?xc38j_e7mgBlBA.wPVonS_Q0_MN3fYHz

CPSC FAQs On Children's Products: http://www.cpsc.gov/en/Business--Manufacturing/Business-Education/childrens-products/

CPSC FAQs On Component Testing: http://www.cpsc.gov/en/business--manufacturing/testing-certification/third-party-testing/component-part-testing/

PPAI Best Practices: Children's Apparel Decoration: http://www.ppai.org/media/1796/pr-bp-childrens-apparel-decoration.pdf

Secondary Tracking Label for Third-Party Decoration of Children's Apparel Best Practice:
http://www.ppai.org/media/1818/pr-bp-secondary-tracking-label.pdf

Care Labeling for Apparel Best Practice:
http://www.ppai.org/media/1795/pr-bp-care-labeling-apparel.pdf

Responsible Sourcing FAQs: http://www.ppai.org/corporate-responsibility/product-responsibility/product-responsibility-faqs/

CPSC-Accepted Third-Party Testing Lab: www.cpsc.gov/en/Business--Manufacturing/Testing-Certification/Lab-Accreditation/

PPAI Promotional Products Turbo Test®: http://ppai.org/corporate-responsibility/product-responsibility/solutions/#8104f083-d27d-4788-83f6-8c236b8d9494

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