

Product Responsibility Best Practices	SUBJECT Secondary Tracking Label For Third-Party Decoration Of Children's Apparel		LAST UPDATE July 2019
	APPLIES TO • Suppliers • Third Party Decorators • Distributors	FOCUS ON Required tracking label when decoration of children's apparel is a separate process from manufacturing of the "blank," undecorated garment.	
	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		Intended for beginner compliance programs

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)* requires that all children's products include permanent distinguishing marks, also known as tracking labels. They must be affixed to the product and its packaging to provide certain identifying information. The tracking label is intended to enable consumers to trace the product to the manufacturer and production lot in the event of a recall.

When a distributor sources from an apparel distributor, contracts with a third-party decorator to apply ink or thread to a garment, and sells that product to an end buyer, the garment has been altered and needs a second tracking label for the same purpose as the first.

Tracking Label Requirements:

The tracking label must contain information that will enable the manufacturer and ultimate purchaser to determine the manufacturer, location and date of production, and cohort information—such as the batch, run number or other identifying characteristics and any other information determined by the manufacturer to help determine the source of the product.

Content Option 1. Include the following on the label itself.

1. Decorator or distributor's name
2. Month and year decoration was applied
3. City and state (or city, country) where decoration was applied
4. Decorator or distributor's batch or internal order number
5. Any other information to facilitate ascertaining the specific source of the product.
6. Contact information (e-mail or phone number)



The label will refer the end user to the company responsible for maintaining the tracking label records and test reports, and for initiating a recall. This can be either the decorator or the distributor, but it cannot be both.

Content Option 2. PPAI has developed a free online solution for UPIC subscribers.

The PPAI Tracking Label Solution allows for a short URL to be created and imprinted on the product with an appended tracking code: [http://ps.ppai.org/\[thetrackingcode\]](http://ps.ppai.org/[thetrackingcode]) and the company name.

With this system, a URL can be used to satisfy the requirements for items 2 through 6 above.

The distributor or decorator's name must be printed along with the URL so a consumer without access to the internet can know whom to contact directly.

Tracking Labels Must Be Permanent. Hangtags and adhesive labels are not permanent and, therefore, don't qualify for this purpose.

Distributor Becomes Manufacturer. When the distributor contracts for decoration after procuring the "blank" garment the distributor becomes the manufacturer—and the responsible party—in the eyes of the *Consumer Product Safety Commission (CPSC)*, of the embellishments to the product.

Note: If the product is decorated by the original garment supplier and assuming that same firm is applying the correct label, no secondary tracking label is required since traceability can be ensured using one tracking label.

Infant And Youth Sizes Only. Since the law applies to children's products (i.e. intended for children 12 and younger), the labels must be applied to infant and youth sized garments. Adult extra small and larger sized garments would **not** require a tracking label.

Label Location:

The tracking label can be printed on the inside back neck, on the bottom hemline or sewn in as a label behind the original care/tracking label. It can also be incorporated into the design/imprint itself.

No One Size Fits All Solution:

The CPSC recognizes that a variety of solutions may have to be deployed to comply with this regulation and allows for some flexibility in the process of using tracking labels as long as the basic elements are consistent.

Online Resources:

CPSC Statement of Policy of Section 103(a): www.cpsc.gov/en/Regulations-Laws--Standards/Rulemaking/Final-and-Proposed-Rules/Tracking-Labels/

CPSC Published FAQs: www.cpsc.gov/en/business--manufacturing/business-education/tracking-label/faq-tracking-labels-on-childrens-products/

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

PPAI Product Safety FAQs: <http://www.ppai.org/corporate-responsibility/product-responsibility/product-responsibility-faqs/>

Consumer Product Safety Improvement Act of 2008 (CPSIA):

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

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

PPAI Webinar: How to Grow Your Business Through Decorating: <https://onlineeducation.ppai.org/products/expo-east-2017-new-to-the-industry-how-to-grow-your-business-through-decorating>

PPAI Webinar: Decorating Performance Wear: <https://onlineeducation.ppai.org/products/decorating-performance-wear>

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