

Component-Part Testing Fact Sheet

The intent of this fact sheet is to provide guidance to SGIA members as they implement the provisions of the Consumer Product Safety Information Act (CPSIA), as administered by the Consumer Product Safety Commission (CPSC). The information contained in this document should not be construed as legal advice. As new information becomes available, this fact sheet will be updated. Currently, the CPSC has issued four proposed rules. SGIA is in the process of developing and submitting comments on the relevant proposals.

What is considered a children's product?

To help facilitate certification of children's products, to the lead and phthalate content standards, the CPSC has issued a final rule, effective December 8, 2011, allowing the use of component testing. While this is an option, use of component testing, by either the final product manufacturer or the supplier of the component part, remains voluntary.

A component part has been defined by the CPSC as any part of a consumer product, including a children's product, which must be tested to assess the product's ability to comply with a specific rule, ban, standard or regulation. Testing of component parts may be undertaken prior to final assembly of the product.

A certified component part may certify the final product based on component-part testing as long as certain key requirements are met: Testing of the component part will help assess compliance with a particular standard, such as the lead content in a non-metal children's product, and the part tested is identical, in all material aspects, to the final part used in the product.

It is important that the test results are traceable. For the results to be traceable, you, as the final product manufacturer, must be able to identify any and all testing parties involved. This could include the manufacturer, the supplier, the testing laboratory or a third party conformity assessment body.

The company certifying the component part must ensure that, while the part is in their custody, proper management practices are in place for all raw materials, to mitigate possible contamination sources, and that the final manufacturing process does not result in the addition of any lead or phthalates to the final product.

Further, when component parts are tested, the proper test method must be used:

- Lead in Paint Standard (90 parts per million)
- CPSC-CH-E1002-08 and/or CPSC-CH-E1002-08.1, for Lead Content in Children's Non-Metal Products (100 parts per million)
- CPSC-CH-C1001-09.3, Standard Operating Procedure for Determination of Phthalates

Testing Documentation Requirements

Any entity performing component testing must provide the documentation listed below. These requirements apply to either the supplier of the component material or the final product manufacturer choosing component testing to ensure compliance. The elements listed below must be provided with each component-part testing certificate. If your component part supplier is providing the certification testing, this information must be supplied to you. Otherwise, you cannot use the test data for development of your General Conformity Certificate (GCC).

- Identification of the component part or the finished product tested
 - For the average garment decorator, this would be identification of the ink system used. Other elements on the garment, such as buttons, zippers, grommets, etc., must be tested separately or as a part of the finished garment.
- Identification of a lot or batch number, or some other information to identify the component part to which the testing applies
 - At this juncture, testing of ink colors should be addressed. Within the preamble of the final rule, the CPSC states that if each base color is tested and found to be compliant, then all colors mixed from these base colors will also be in compliance.
 - For the identification of the specific component part, it is recommended that each manufacturer develop a system that allows for easy tracking.

- Identification of the applicable rules for which each component part or final product was tested
- Identification of the testing method and sampling protocol used
- Date, or date range within which, the component part was tested
- Test reports showing results for each component part
- Identification of the party that conducted the testing and an attestation by this testing party that all tests were conducted in accordance with Section 14 of the CPSIA, part 1107 or more specific rules
- Component-part certificates
- Records to support traceability
- An attestation by each certifier or testing party that, while the component part was in their custody, due care was taken to ensure the integrity of the test results

Recordkeeping Requirements

Each certifier or testing party must keep these records for five years.

Specialty Graphic Imaging Association (SGIA)

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