

Although I would recommend to any company involved with consumer goods to read the guidelines, I have reviewed the document and some of the important points I have included here:

- This document describes the Commission's position on a reasonable testing program and how to certify that a product complies with all rules, bans, standards or other regulations applicable to the product under the laws enforced by the Commission.

- There are two types of certification of compliance required by the CPSIA:

- General conformity certificate for consumer products. This is also called a 'supplier's declaration of conformity' and is to be based on a test of each product or upon a reasonable testing program.

- Certificate based on CPSC-recognized third party conformity assessment body testing of children's products. Where requirements for CPSC-recognized third party testing are issued, these must be followed and can only be tested in CPSC-recognized testing centres.

- In some cases the CPSIA requires additional third party testing of children's products when there is a material change in the product's design or manufacturing process.

- Knowledge of production and supply chains can alert manufacturers to the possibility of non-compliant products - new personnel, old equipment, etc all may have a bearing on the quality of product.

- For those companies that produce low-volume goods, the Commission will not expect manufacturers to conduct additional periodic testing on products until at least 10,000 units of that product have been produced since the last third-party testing of that product.

- Component testing may be acceptable to the Commission under these draft guidelines. For example with regard to phthalates, it may only be necessary to test the plastic components of a product rather than the finished product.

- However, while phthalate testing of, for example, plastic eyes may be done as component testing, the whole constructed toy, with eyes, would have to be tested to show compliance with small parts requirements.

Showing compliance to a testing program is all about the paperwork; whether it is for actual tests performed or to show that the components of the product conform to CPSC rules. Showing a paper trail from start to finish is a big step forward in addressing the issue of conformity.

Although a laboratory has to be CPSC-recognized in order to carry out testing to show adherence to CPSC standards, these are also found outside the United States. Indeed Testex, ASL's strategic partner testing facility, are already CPSC-recognized for many textile related tests.

The CPSC are increasing their presence at various ports around the US in order to monitor adherence to regulations; as well as this, the number of import samples collected at ports has increased. This, together with recent civil penalties imposed upon well-known retail and manufacturing companies of between \$31,500 and \$2.3 million, means that when the CPSC guidelines are implemented, manufacturers, retailers and all those involved in consumer products should ensure that they become, and remain, compliant.