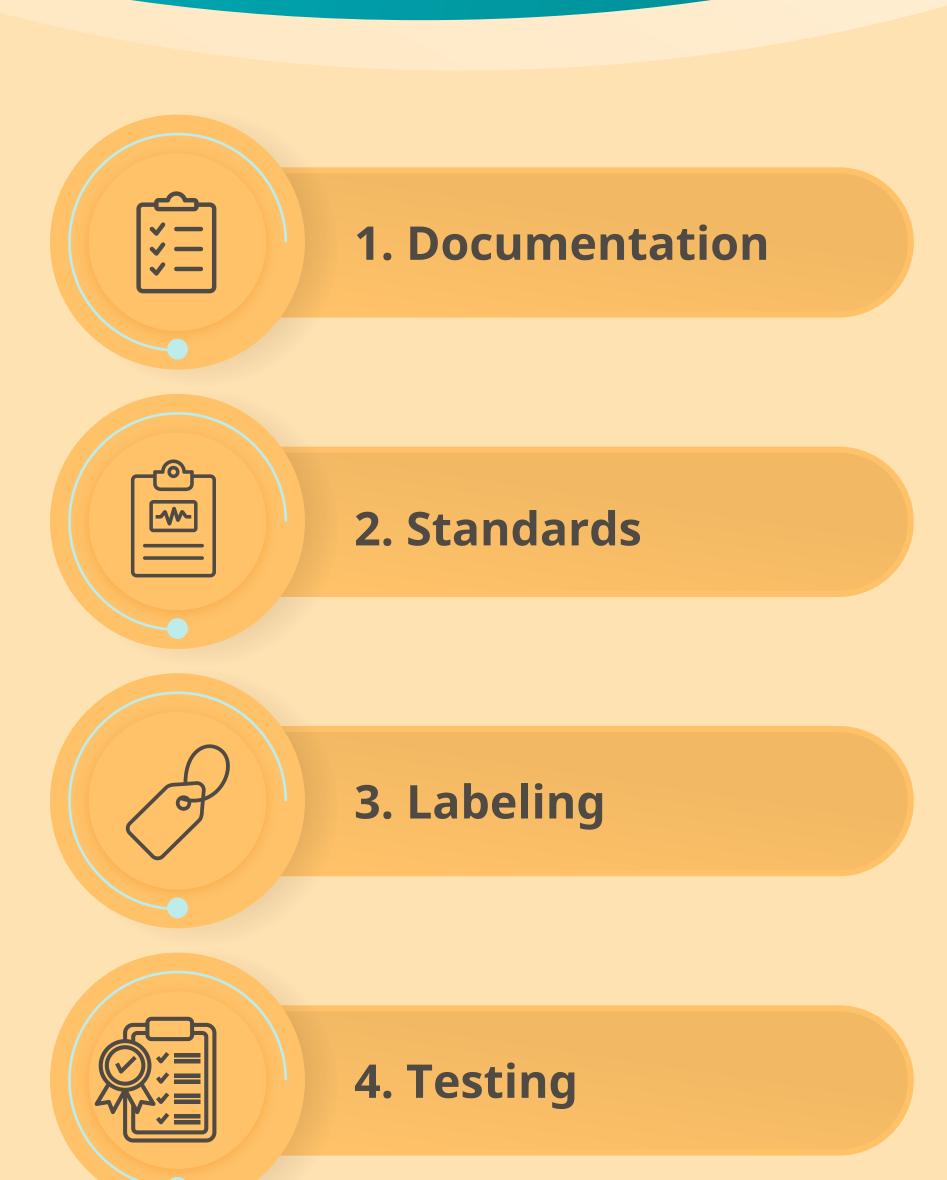# Basic Checklist for Baby Carriers: US Compliance

The BCIA recommends reviewing this checklist annually or when making material changes to your product. This checklist is not a substitute for legal advice.

1. Documentation

2. Standards

3. Labeling

4. Testing

Documentation

1

Periodic Testing Plan

Do I have a written Periodic Testing Plan in place outlining my testing schedule, including the tests to be conducted, the intervals at which the tests will be conducted, and the number of samples to be tested?

2

Children's Product Certificate

Have I created and made available to retailers a Children's Product Certificate listing the regulations with which the product is compliant, and the tests performed? (16 CFR part 1110) Guidance here.

All BCIA members have access to a done-for-you Children's Product Certificate.

3

Product Registration Database

Do I have a plan to retain product registration data for a minimum of 5 years?

BCIA members can utilize our proprietary, turnkey product registration service.

Standards

1
ASTM Standard

ASTM F2236 for Soft Infant and Toddler Carriers
Carriers whose primary use position is upright, including soft structured carriers, front packs, meh dai, hip carriers. Excludes slings.

F2907 for Infant Slings
Carriers in which baby can recline, including pouches, ring slings, wraps, and some hybrid carriers.

F2549 for Frame Child Carriers
Carriers with a stiff frame; often used for carrying children while hiking. compliant with ASTM F2549.

You can purchase the relevant standard at ASTM.org.

2
CPSIA

The Consumer Product Safety Improvement Act has specific requirements for durable nursery products, including infant and child carriers.

3
State Regulations

State regulations include California's PROP 65 regulations and LAW label requirements for padded or filled produccts.

Labeling

1

Federal Labeling Requirements

- Does my product have a permanently attached label noting my company name, contact information (address, phone number, website,) model name or number, manufacture date, and batch/lot number? (CPSIA section 103 & 104)
- Does my exterior packaging also include my company name, contact information, model name or number, manufacture date, and batch/lot number? (CPSIA section 104)
- Does my product have a permanently attached label noting fabric content and country of origin? (Textile Act)
- Does my product have a postage-paid registration card? (CPSIA section 104)
- Does my registration card have all of the required information, in the required format?
- Is my registration card attached to my product such that it must be removed in order to use the product?
- Do I have an online registration system, in the required format? (CPSIA section 104)

2

State Labeling Requirements

- If you sell products that are padded or otherwise stuffed/filled with fabric sewn inside your product, law labels are required by several states.
- Your product may be subject to California's PROP 65 labeling requiremets.

Product Testing

1
Federal Testing Requirements

Mandatory testing must be completed by a <u>CPSC-approved lab</u>

- 16 CFR 1226 Soft Infant and Toddler Carriers, incorporating ASTM F2236
- 16 CFR 1228 Sling Carriers, incorporating ASTM F2907
- 16 CFR 1230 Frame Child Carriers, incorporating ASTM F2549
- In addition to covering mechanical testing, labeling, and instructions, the required safety standards test the product for the following: small parts (16 CFR 1501), sharp points and edges (16 CFR 1500.48 & 49), flammability (16 CFR 1610), toxicity (16 CFR 1500.41 & 42)
- Has my product (or its components, including buckles, snaps, zippers, rings) been tested for a total lead content of less than 100 ppm (excluding dyed, undyed, roller-printed, or batiked fabrics, which have been exempted)? (15 U.S.C 1278a)
- Have any painted components or screen-printed parts of my fabric been tested for lead paint at a level less than 90 ppm? (16 CFR 1303)
- Has my product been evaluated for phthalates? (16 CFR 1307)
- Have the tests been carried out by a CPSC-accepted lab? To find a lab near you, <u>check here</u>. BCIA members can receive significant discounts on the cost of testing.
- Do I have a written Periodic Testing Plan in place outlining my testing schedule, including the tests to be conducted, the intervals at which the tests will be conducted, and the number of samples to be tested?
- Am I familiar with the three types of Third Party Testing?

2
State Testing Requirements

California PROP 65
- Carefully review California's PROP 65 regulation to determine whether you need to conduct relevant testing.

Do you Want Compliance Assistance and Testing Discounts?

All BCIA members have access to compliance information, webinars, how-to articles, and low-cost compliance services.

1 Compliance help

2 Testing discounts

3 Industry information

4 Networking and connections

Not a member? Join today!