GUIDELINES FOR ISSUING A CHILDREN'S PRODUCT CERTIFICATE

This guide was prepared by Kristi Hayes-Devlin, CEM of WrapsodyBaby.com, for the Baby Carrier Industry Alliance as a service to BCIA members. Though we have done our best to represent all information as accurately as possible, you should confirm the information and have your own compliance program reviewed by a product safety attorney. This is for your information only and does not constitute legal advice.

WHAT IS A CHILDREN'S PRODUCT CERTIFICATE (also called a CPC)?

The CPC is a document required by the Consumer Product Safety Improvement Act (CPSIA). This document must accompany all sales of consumer products designed and intended for children under the age of 12. For durable nursery products such as baby carriers, there is no "small batch" exemption for third-party testing, and the certificate MUST be based upon testing at CPSC-accredited labs. Whether you pay a CPSC-accredited lab to perform the tests or your supplier pays the CPSC-accredited lab and furnishes you their certificate, it is the job of each US MANUFACTURER OR IMPORTER to issue a certificate for each unique product they sell.

This certificate is sometimes also called a CPSIA certificate. People may also refer to it as a General Certificate of Conformity (GCC) though this is technically incorrect as this is the name for similar certificates required for regulated general purpose products.

WHEN DOES A BABY CARRIER COMPANY NEED TO ISSUE A CHILDREN'S PRODUCT CERTIFICATE?

A CPC must be issued by any company selling baby carriers within the United States of America to another reseller (instead of an end consumer). It can be sent in hard copy or a URL can be provided with each order.

If a foreign (non-US) company furnishes a CPC with the product, the US importer is still responsible for creating and furnishing their own certificate and for maintaining adequate records to support such certification. You may not simply pass on any certificate from a foreign manufacturer.

WHAT IF I ONLY SELL DIRECTLY TO CONSUMERS?

If a US importer or manufacturer sells only to consumers but NOT to retailers, resellers, or distributors, the US importer must still create a CPC for each product and keep such a certificate on file and furnish it to the CPSC or other regulatory body upon request.
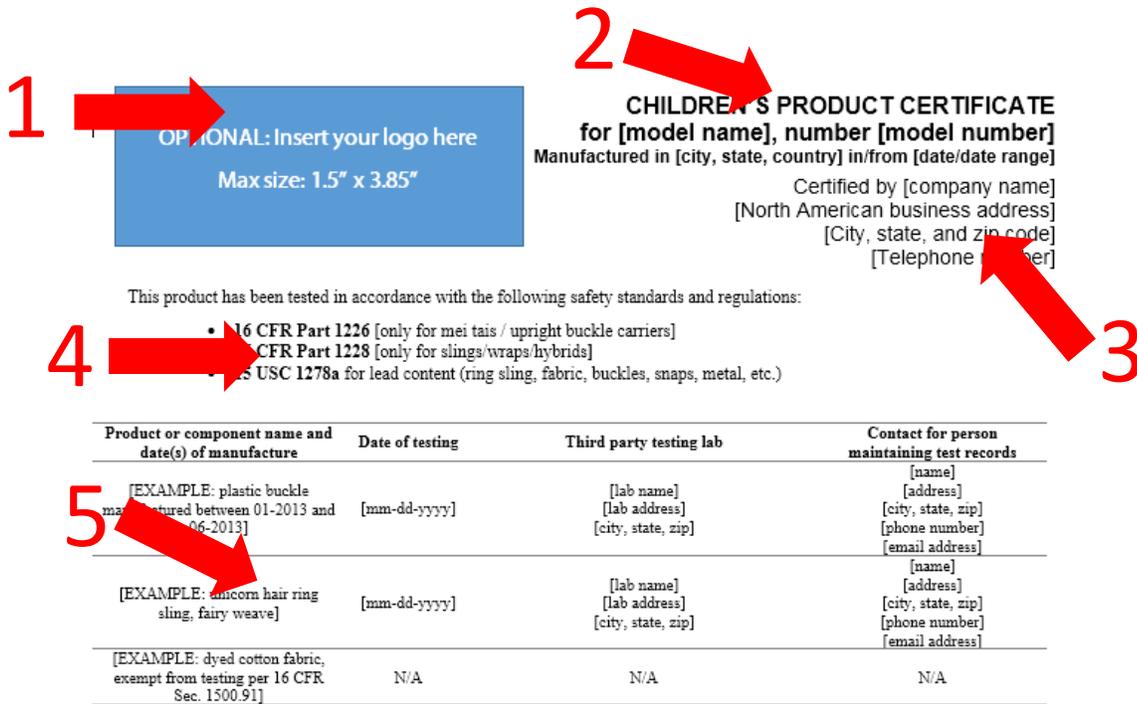
HOW MANY CERTIFICATES DO I NEED TO CREATE? HOW OFTEN?

Each distinct product you create needs its own certificate. A product is distinct when it is "materially different" from another. If there is a difference in fabric style, fabric manufacturer, ring size, buckle size, or weaving size, it is a distinct product. Normally, differences in sizing that don't affect construction (length of straps, length of wrap, length of sling) do not create material differences, although changes in width or seat of the fabric normally do create material difference. Likewise, changes in dye color normally do not create material differences, although changes in screenprinting colors may create a difference.

Also: you will need to recertify within the construct of a "reasonable testing program." The CPSC recommends repeating third-party testing or obtaining component certificates at least once each year. Your compliance program will determine how often you reissue your certification.

HOW SPECIFIC MUST I BE ABOUT DATES AND ADDRESSES IN MY CERTIFICATE?

Generally, month and year of manufacture will be sufficient. However, the greater the complexity, variety, and frequency of manufacture, the more specific the date should be. Likewise, if you have several places of manufacture (or several places along your assembly line) the place of final assembly is suitable for the certificate. City and state are the minimum requirements for place of manufacture.

That said, each product should bear a tracking number or other mark which will allow you to easily determine exact place and date of manufacture for an entire batch. Your tracking and labeling program should address that such that your recordkeeping combined with your children's product certificates can easily identify each unique product grouping and batch, especially if your product is manufactured in differing locations on the way to final assembly (i.e., if you employ separate seamstresses who may be using separate equipment, machine settings, or brands of thread).

CHILDREN'S PRODUCT CERTIFICATE
for [model name], number [model number]
Manufactured in [city, state, country] in/from [date/date range]

Certified by [company name]
[North American business address]
[City, state, and zip code]
[Telephone number]

OPTIONAL: Insert your logo here

Max size: 1.5" x 3.85"

This product has been tested in accordance with the following safety standards and regulations:

- 16 CFR Part 1226 [only for mei tais / upright buckle carriers]
- 16 CFR Part 1228 [only for slings/wraps/hybrids]
- 15 USC 1278a for lead content (ring sling, fabric, buckles, snaps, metal, etc.)

Product or component name and date(s) of manufacture	Date of testing	Third party testing lab	Contact for person maintaining test records
[EXAMPLE: plastic buckle manufactured between 01-2013 and 06-2013]	[mm-dd-yyyy]	[lab name] [lab address] [city, state, zip]	[name] [address] [city, state, zip] [phone number] [email address]
[EXAMPLE: unicorn hair ring sling, fairy weave]	[mm-dd-yyyy]	[lab name] [lab address] [city, state, zip]	[name] [address] [city, state, zip] [phone number] [email address]
[EXAMPLE: dyed cotton fabric, exempt from testing per 16 CFR Sec. 1500.91]	N/A	N/A	N/A

1. Insert your logo if you choose. Size should be no larger than 1.5x3.85.
2. Insert your own model name and number. If your company does not currently use model numbers for identifying products, the CPSC has stated that a unique model name alone can suffice here.
3. This is your company – or you, if you are a sole proprieter who has no registered DBA. The certificate requirements state that a US address should be used, but emails with the CPSC indicate that any North American business address will suffice if your company has no branch in the US.
4. These are the third-party certifications and tests currently required by US law. The sling standard will likely become mandatory sometimes in 2016; prior to that date, you may cite the voluntary ASTM standard if you have chosen to test to it. Read this text carefully and remove statutes that do not apply to the carrier being certified. You may add other certifications if you choose, such as EN-13209, if you would like. Some would argue it is best to certify to only the minimum requirements.
5. IF YOU ARE RELYING ON THIRD-PARTY CERTIFICATION, such as using a General Certificate of Conformity from SlingRings or your buckle company, you must obtain and hold on file a copy of their certificate. Here, you will list the component part, date it was tested, the third-party testing lab, and YOU or YOUR COMPLIANCE DIRECTOR are the contact person maintaining records.

   IF YOU ARE CERTIFYING A PRODUCT OR MATERIAL EXEMPT FROM THIRD PARTY TESTING, you should list the product or component, the relevant statute stating that it is exempt, and the other categories are not applicable.

   IF YOU ARE CERTIFYING YOUR PRODUCT AND YOU HAVE HAD IT TESTED ONCE, FULLY ASSEMBLED, you do not need to list component parts separately. You will only need to list them if separate testing has been used to verify compliance – for instance, if you change printed label companies and had the labels tested separately from the carriers themselves.