



Baby Carrier Industry Alliance

PO Box 298
McKinney, TX 75070

(512) 943-2242

BabyCarrierIndustryAlliance.org

The Baby Carrier Industry Alliance exists to increase awareness of the value of quality baby carriers and to support those in the baby carrier industry.

CPSIA Compliance for Retailers of Baby Carriers

While the bulk of responsibility for compliance with the Consumer Product Safety Improvement Act (CPSIA), passed by Congress in 2008, lies with manufacturers and importers of children’s products, retailers must ensure that the products they sell comply with CPSIA.

Selling products not in compliance with CPSIA, even if they are locally made by handcrafters, carries a great deal of risk. Violating the new regulations could lead to substantial civil or criminal penalties.

It should be noted that there are regulations that apply to all children’s products, and there are additional regulations applying to durable nursery products, such as baby carriers.

Children’s Product Certificate (CPC, also called CoC or GCC)

The first thing you should know is that CPCs must be available for all children’s products that you sell. This is a certification from the manufacturer/importer of your product that the product complies with any and all applicable laws and regulations (see specific requirements in the box below), and you should not sell any baby carriers without this certification. You do not have to keep the physical certificates on hand, but manufacturers are legally required to provide access to them, for every product that you purchase.

BCIA suggests that it is in a retailer’s best interest to keep a copy of these on file, either printed or electronic certificates. Otherwise, if you are ever called on to produce the certificates, you will find yourself having to track them down from the manufacturers. Do not assume that your suppliers are in compliance; verify.

If you import foreign-manufactured products into the US, then you become responsible for compliance with CPSIA. Many foreign manufacturers are willing to work with US importers to bring their products into compliance. But if they are not, then it is up to you. If the manufacturer can provide test results from a CPSC-accepted third-party testing lab which prove that the product complies with relevant US regulations, then you can create your own certificate (contact BCIA for a template). For baby carriers, that means you will need a lab report certifying that the product meets CPSIA lead limits (content and/or paint).

What is a Children’s Product Certificate?

A CPC is a document provided by the manufacturer or importer of a children’s product. It must:

- Identify the product covered by the certificate
- Cite each CPSC product safety regulation to which the product is being certified (for baby carriers, lead content and/or paint)
- Identify the US importer or domestic manufacturer certifying product compliance
- Include contact information for the individual maintaining records of test results
- Identify date and place of manufacture
- Identify date and place product was tested for compliance
- Identify any third-party laboratory on whose testing certification depends

Tracking Information

Per CPSIA, children’s products now require tracking and labeling information. The information must be permanently attached to the carrier and also displayed on the packaging. All slings and carriers you purchase for resale must comply with these labeling requirements:

- manufacturer’s name
- manufacturer’s contact information
- model name and/or number
- date of manufacture (may be expressed in code)
- location of manufacture
- lot number (may be expressed in code)

If you are importing a product directly from a foreign manufacturer, you will likely need the foreign manufacturer’s cooperation to create these tracking labels. (Note: Woven labels will not need to be tested for lead; printed or heat-transferred labels will.)

Product Registration

Durable nursery products, like baby carriers, have additional requirements under the CPSIA legislation. US-based manufacturers and distributors are responsible for ensuring compliance with CPSIA, but if you, as a retailer, import products for resale directly from a foreign manufacturer, then it is you who are responsible for complying.

All durable nursery products are required to be sold with registration cards attached to the product. It is very important that you not remove these cards from any product that will be sold to a consumer, as the intention is that the cards must be noticed and handled by the consumer before using the product. In addition, consumers must have access to an online registration system. Both the physical cards and the online system have very specific requirements regarding format and content. BCIA has a separate publication in the members section of the BCIA website to help you navigate the complex rules surrounding this requirement. Additionally, BCIA has a Product Registration Service and discounted online registration system available to members, which will save you time, money, and headaches when implementing these requirements.

Duty to Report

Retailers have a legal obligation to report any consumer product that may be “unsafe, hazardous, a choking hazard, or otherwise non-compliant with consumer product safety rules”. The exception is if you know that the hazard has already been reported to CPSC. First, contact the manufacturer. If they can assure you, in writing, that CPSC has already been notified, then your duty has been satisfied. Otherwise, you must report directly to CPSC. It’s very easy to file a report through the SaferProducts.gov website, under the “Business” tab.

This is a lot of information to absorb, and it is only an overview. If you have any questions, or need more information, please contact BCIA by visiting www.babycarrierindustryalliance.org and we will find the answer for you as quickly as possible.

Durable nursery products include:

infant carriers
(including slings)

full-size and non-full-size
cribs and toddler beds

high chairs, booster chairs,
and hook on chairs

bath seats

gates and other enclosure
for confining a child

play yards, stationary
activity centers, and
walkers

strollers

swings

bassinets and cradles

Checklist for Evaluating Baby Carriers for Compliance

For any baby carriers you sell, you must have:

- Access to a certificate of compliance
- Product registration cards attached to the product
- Tracking information on permanent labels
- Tracking information on product packaging

If any of these items is missing, do not offer the product for sale until either the manufacturer/distributor (for domestic products) or you (for directly-imported products) bring the product into compliance.