## US Manufacturer Regulatory Compliance Checklist

BCIA recommends that manufacturers work through this checklist once a year, or when there is a material change to the product.

**Testing**

1. Has my product (or its components) been tested for a total lead content of less than 100 ppm? (excluding dyed, undyed, roller-printed, or batiked fabrics, which have been exempted) (CPSIA section 101)
2. 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)
3. Has my product been tested for small parts that may present a choking, ingestion, or aspiration hazard to small children? (16 CFR 1501)
4. Has my product been tested for sharp points and edges? (16 CFR 1500.48 & 49)
5. Has my product been evaluated for flammability? (16 CFR 1610)
6. If my product has unusual decorative trim or fabric finishes, have they been evaluated for skin and eye irritants and toxicity? (16 CFR 1500.41 & 42)
7. Have the tests been carried out by a CPSC-accepted lab? To find a lab near you, check here: [www.cpsc.gov/labsearch](http://www.cpsc.gov/labsearch)
8. Have I created and made available to retailers a Children’s Product Certificate listing the regulations and standards with which the product is compliant, and the tests performed to assure compliance? (16 CFR part 1110) Guidance here: <http://www.cpsc.gov/about/cpsia/faq/elecertfaq.pdf>
9. 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?)
10. Am I familiar with the three types of Third Party Testing?

i)Initial Third Party Testing (certification testing)

ii)Material Change Testing (when there is a change to the product's design, to the manufacturing process, or to the source of component parts for the product)

iii)Periodic Testing or Production Testing

11 Has my product been tested to the applicable ASTM standard if required?

(CPSIA section 104) See below for compliance dates and deadlines.

**Labeling**

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

**ASTM Standards**

1. Am I clear about which ASTM safety standard is relevant to my product(s): soft infant carriers, frame child carriers, and/or infant sling carriers?
   1. soft infant carrier: carriers whose primary use position is upright, specifically soft packs, mei tais, hip carriers <http://www.astm.org/Standards/F2236.htm>

\*Compliance deadline: September 29, 2014. All carriers which fall under F2236 made or imported after September 29, 2014 must be tested and compliant with ASTM F2236

* 1. infant sling carrier: carriers in which baby can recline, specifically pouches, ring slings, wraps, hybrids <http://www.astm.org/Standards/F2907.htm>

\*Compliance deadline: January 30, 2018. All carriers which fall under F2907 made or imported after January 30, 2018 must be tested and compliant with ASTM F2907.

* 1. frame child carriers: carriers with a stiff frame <http://www.astm.org/Standards/F2549.htm>

\* Compliance deadline: September 2, 2016. All carriers which fall under F2549 made or imported after September 2, 2016 must be tested and compliant with ASTM F2549.

1. Have I acquired and read the relevant standard(s)?
2. Has my product been tested to the specifications of the relevant standard(s)?

For details about any specific point, or clarifying questions, please contact BCIA through our website: [babycarrierindustryalliance.org](http://babycarrierindustryalliance.memberlodge.org/prs)

This checklist is not intended as legal advice, but just as a way for you to orient yourself as to the safety and compliance issues faced by baby carriers. It is ultimately your responsibility to make sure your products comply with all relevant US regulations, and the CPSC-accepted laboratory that you decide to work with can help ensure that you have covered all of your bases.