**GUIDELINES FOR ISSUING A CHILDREN’S PRODUCT CERTIFICATE**

*This guide was prepared by Kristi Hayes-Devlin for the Baby Carrier Industry Alliance­­ as a service to BCIA members in 2015. It was updated by the BCIA in Oct 2019. 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).

FURTHER INFORMATION ON CPC:

CPSC Resource page on Children’s Product Certificates: <https://www.cpsc.gov/Testing-Certification/Childrens-Product-Certificate-CPC>

CPSC Regulatory Robot- if you are looking to verify the full list of regulations and exemptions that apply to your specific product, this is an excellent resource: <https://business.cpsc.gov/robot/>

FILLING OUT YOUR CPC:

The template is relatively self-explanatory, and we have numbered the sections according to the CPSC model CPC. Here are a few extra explanation points to keep in mind while filling out the CPC template

1. 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.
2. These are the third-party certifications and tests currently required by US law. Delete any that do not apply to the carrier being certified (ex. a carrier with no plastic components can either delete or mark phthalates and plastics requirements as N/A.) 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. We have left this list intentionally robust to meet amazon and other 3rd party seller requirements.
3. This is your company – or you, if you are a sole proprietor 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. Please note that if you are submitting a CPC to Amazon, they require a US address.
4. This is YOU or YOUR COMPLIANCE DIRECTOR as the contact person maintaining records.
5. Date and place where the product was manufactured. Note: you cannot certify a product that has not yet been produced, i.e, you can use a date range for a production batch, but not a future date.
6. 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, and 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 that 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.

Questions, comments or concerns? Please contact Linnea at director@babycarrierindustryalliance.org