

Cost of Third-Party Testing

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1. More Testing = More assurance that all production will comply
2. More Testing = More costs

Factors Affecting the Cost of Third-Party Testing

- What rules apply to the product (e.g., lead, phthalates, mechanical standards)
- Number of components or complexity of the product
- Volume of testing needed by the manufacturer
- Location of the testing

Some Typical Costs

Lead (ICP): \$20 to more than \$100

Phthalates: \$100 to \$350

Mechanical: \$50 to more than \$1,500

Examples

Assumption: No component testing.

Blocks

Test	Components	Cost/test	Total
Lead-in-paint	4	\$50	\$200
ASTM Toxics	4	\$90	\$360
Total			\$560

* Certification and 3rd party testing not currently required for all tests



Toy Xylophone

Test	Components	Cost/test	Total
Lead	5 paints, 1 substrate	\$50	\$300
ASTM Toxics	5	\$90	\$450
Small Parts			\$100
Total			\$850

* Certification and 3rd party testing not currently required for all tests



Children's Sleepwear

Test	Components	Cost/test	Total
Lead	1	\$50	\$50
Flammability			\$930
Total			\$980

* Certification and 3rd party testing not currently required for all tests



Crib

Test	Components	Cost/test	Total
Lead	1 paint, 2 substrates	\$50	\$150
Mechanical			\$1,200
Total			\$1,350

* Certification and 3rd party testing not currently required for all tests



Amount of Testing Drives Total Cost of Testing

- Sample size
- Frequency of retesting

Total Cost

Product	Amount of Testing per Year	
	One Sample	10 Samples
Blocks	\$560	\$5,600
Xylophone	\$850	\$8,500
Sleepwear	\$980	\$9,800
Crib	\$1,350	\$13,500

Per Unit Costs

Product	Output per Year	
	5,000	500,000
Blocks	\$0.11 - \$1.14	<\$0.01 - \$0.01
Xylophone	\$0.17 - \$1.70	<\$0.01 - \$0.02
Sleepwear	\$0.20 - \$1.96	<\$0.01 - \$0.02
Crib	\$0.27 - \$2.70	<0.01 - \$0.03

Component Testing

Reduces the number of tests, and
Allows the cost to be spread over more
product

Not applicable to all tests, and
Not all component suppliers may be willing
to conduct the tests

Low Cost Scenario – Component Testing Virtually Eliminates the per unit Cost of Chemical Testing.

Total Cost (with Component Testing)

Product	Amount of Testing per Year	
	One Sample	10 Samples
Blocks	\$0	\$0
Xylophone	\$100	\$1,000
Sleepwear	\$930	\$9,300
Crib	\$1,200	\$12,000

Per Unit Costs

Product	5,000 Units per Year	
	No Component Testing	w/Component Testing
Blocks	\$0.11 - \$1.14	\$0 - \$0
Xylophone	\$0.17 - \$1.70	\$0.02 - \$0.20
Sleepwear	\$0.20 - \$1.96	\$0.19 - \$1.86
Crib	\$0.27 - \$2.70	\$0.24 - \$2.40

Summary

1. Third-party testing can be expensive, especially if multiple samples are required to be tested.
2. The burden will generally fall heaviest on small and low-volume manufacturers.
3. Component testing can potentially reduce, but not eliminate, the cost of third-party testing.
4. It is uncertain how many component manufacturers will voluntarily certify their components based on third-party testing, if component testing is allowed by the Commission.