

The background features a large blue polygon on the right side, a smaller orange triangle on the left, and a grey triangle at the bottom left. The text is positioned within the blue area.

**Toward Seamless
Surveillance:
U.S. Developments**

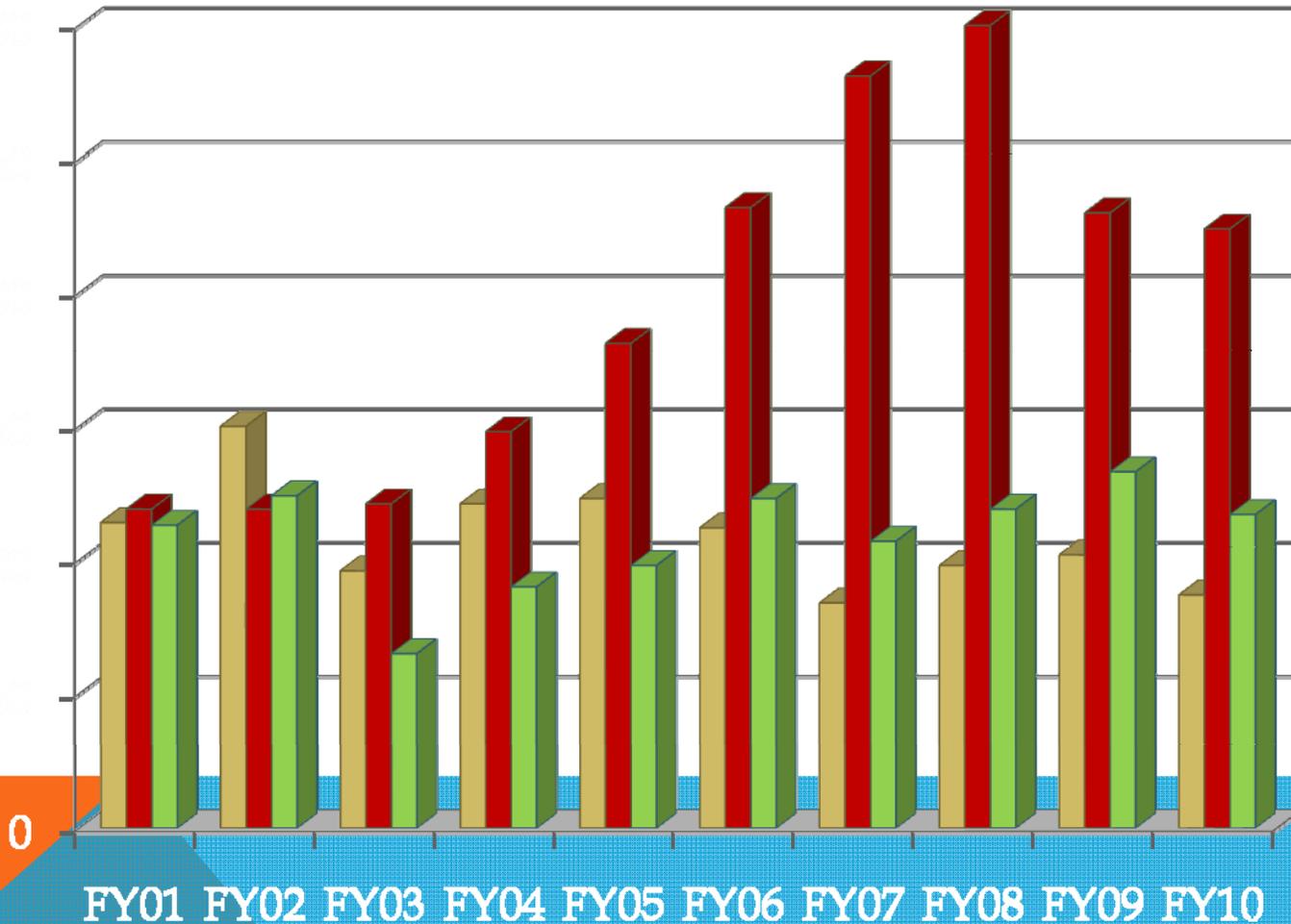
**Dennis Blasius
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Safety Commission (CPSC)**

REQUIRES A MULTIFACETED APPROACH

- Import surveillance
- Retail surveillance
- Internet surveillance



CPSC RECALLS BY PRODUCT ORIGIN



United States

China/HK

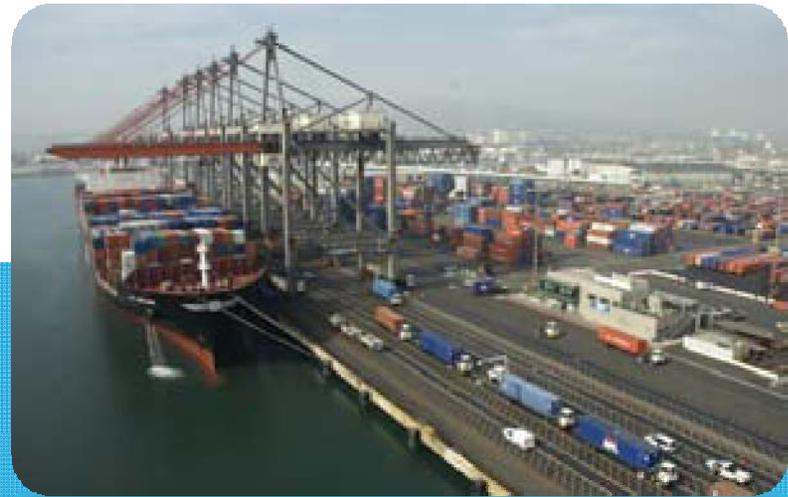
Rest of the World

OFFICE OF IMPORT SURVEILLANCE

- Division created in 2008; a recent restructuring has elevated the division to an office.
- Supported by CPSC's Office of the General Counsel; coordinates closely with CPSC's Office of Compliance and Field Operations.
- Works side by side with U.S. Office of Customs and Border Protection (CBP) at many ports to review shipments for health and safety risks.

IMPORT SURVEILLANCE

- Close and careful scrutiny of the import documentation filed by the import broker for anomalies
- Physical screening of products by CPSC Field Investigators at the port

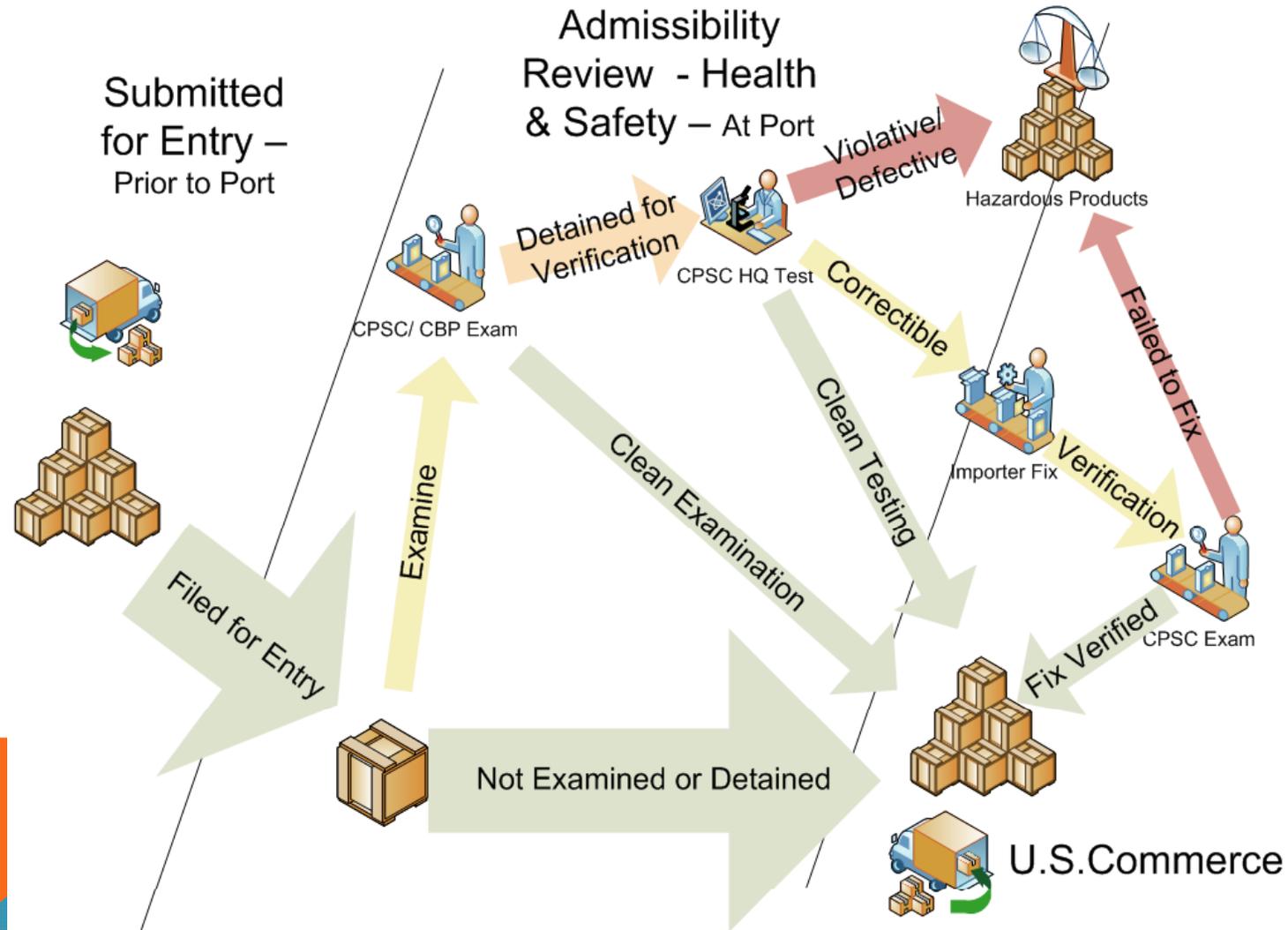


IMPORT SURVEILLANCE

- CPSC co-located at busiest ports working with U.S. Customs and Border Protection inspectors
- Various agencies co-locate analyst staff at the Commercial Targeting Analysis Center (CTAC) in downtown Washington, DC, which leverages targeting ability – identifying most likely at-risk products



ADMISSIBILITY DETERMINATION



EXAMINATION

- Screen for Compliance
 - Age Grading
 - Small Parts, Rattle, Pacifier
 - Labeling (Warnings)
- Lead Screening with Handheld X-Ray Fluorescence Device (XRF)
- Phthalates
- Certification
- Tracking Labels

DETENTION

- CPSC began detaining shipments under its authority on June 14, 2010.
- CBP remains the custodian of the merchandise.
- Notice of Detention will be issued within 5 days of initiation of the examination.

NONCOMPLIANCE DETECTED

Collect samples (based on type of violation)

- Issue receipt for samples.
- Process samples.
- Ship to Sample Storage Facility/CPSC Laboratory.
- Input Sample Collection Report.
- Issue Notice of Sampling & Detention or Conditional Release.

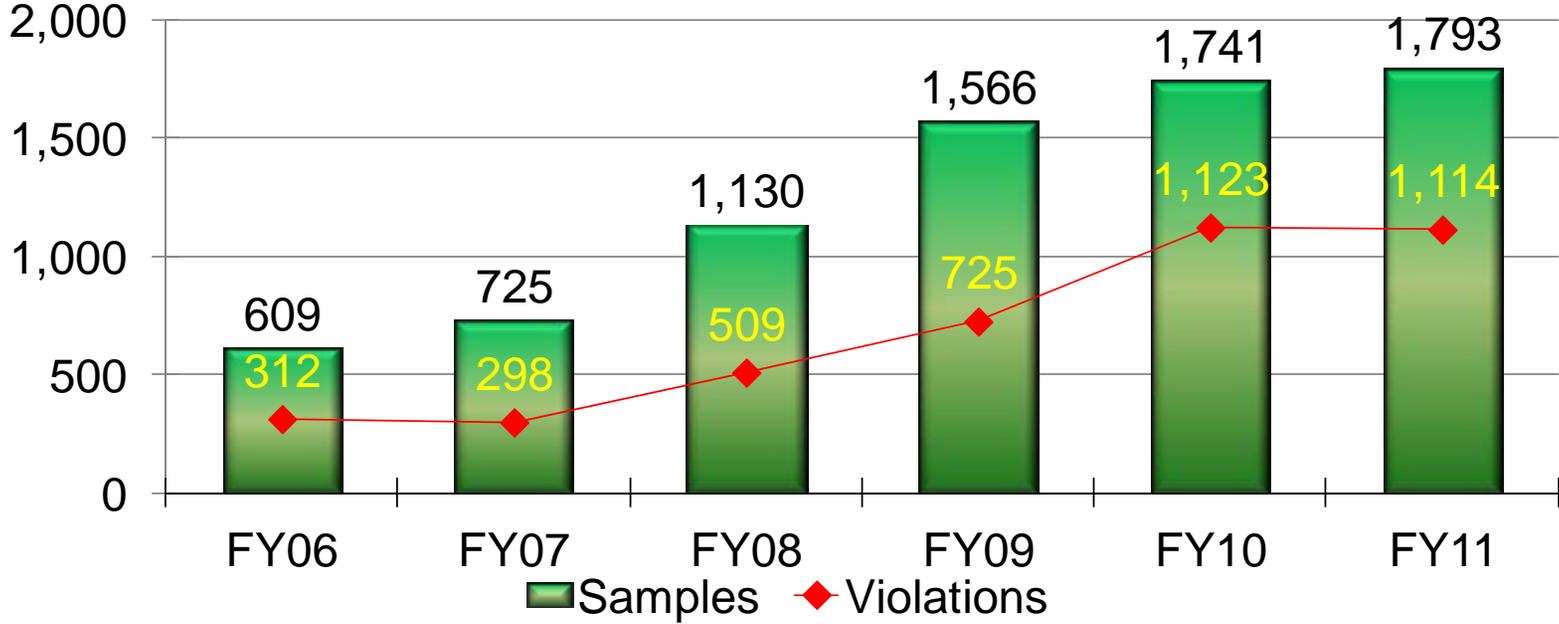
NONCOMPLIANCE DETECTED

At CPSC HQ:

- Evaluate age determination;
- Perform laboratory testing; and
- Write laboratory analysis report.

It can take Commission staff several weeks to test and determine compliance. The importer is responsible for all costs associated with storage while sampling and testing occurs.

IMPORT SAMPLES COLLECTED



RESOLUTION OF A DETENTION

- Release
- Recondition
- Voluntary Exportation with permission or destruction
- Seizure by CBP
- Refusal of admission

IMPROVEMENT ACT OF 2008 (CPSIA)

Section 222 requires CPSC to:

Develop a *Risk Assessment Methodology (RAM)* for the identification of shipments of consumer products that are intended for import into the United States and likely to include consumer products that: (1) violate health and safety rules, (2) are not accompanied by a certificate, (3) are imminently hazardous, (4) create a substantial product hazard, or (5) come from a manufacturer in violation of recordkeeping requirements.

In developing the methodology:

- use CBP's International Trade Data System (ITDS),
- make it part of the IT modernization plan, and
- evaluate how to share information with CBP involving risky shipments.

RAM GOALS

Develop an information system that:

- facilitates the identification of illegitimate cargo at entry/reduces the number of holds on legitimate cargo, and
- captures required data in a standardized fashion.

Automate hazard program reporting to inform subject matter experts of importation patterns.

RAM ARCHITECTURE

Integrate risk information to model and support Commission enforcement strategy involving product hazards at importation.

Potential sources of risk data include:

- Shipment (CBP)
- Case history (CPSC & CBP)
- Screening history (CPSC)
- Injury and death (CPSC)
- Commercial information (Third Party)

THE ROLE OF GTIN/GPC

- Repetition of products in a company's supply chain are identifiable between shipments.
- Standardized identification of entity and product model allows regulators to identify specific products in a shipment.
- Improved specificity of product categorization allows regulators to target risks more precisely.

GLOBAL CLASSIFICATION CODES EXTEND PRODUCT VISIBILITY



DESCRIPTION

STEP START WALK N
RIDE

BOUNCIN BABBLES

HEROES ACTION
FIGURES

REGULATOR ROLE

- Inspect shipments with the highest probability of violations or defects.
 - Limit the number of “random” searches.
- Enforce laws based upon good information.
 - Identify and improve data sources.
- Facilitate trade for entities in good control of supply chain where there are no violations or defects.

FUTURE CPSC PROJECTS

Modernize import regulations

- Ask for GTINs to be provided with certificates at entry when available
- Implement latest technology available through CBP and other partners
- Cooperate with other economies, such as China and the EU

ELECTRONIC MESSAGING

- Several regulatory requirements involve sharing data prior to, or at the time of, importation:
 - Third Party Certification, and
 - Self Certification.
- CPSC staff are designing methods for electronic transfer of data elements to satisfy these requirements.

ELECTRONIC MESSAGING

- At the time of entry, entering required data elements for certificates and other requirements will allow electronic review and facilitate the release of shipment.
- CPSC is developing guidance that should be available in 3-9 months.

CPSC PUBLIC IMPORT SURVEILLANCE REPORTS

Port Surveillance News: CPSC Takes Safety to the Front Lines, Prevents More Than 360,000 Violative Units from Reaching Consumers in 2nd Quarter of Fiscal Year 2012

WASHINGTON, D.C. - U.S. Consumer Product Safety Commission (CPSC) investigators continued to enforce product safety by screening more than 3,700 imported products at ports of entry into the United States and preventing more than 360,000 units of violative and hazardous imported products from reaching the hands of consumers during the second quarter of fiscal year 2012.

RETAIL SURVEILLANCE

- Targeted blitzes focused on holiday toy safety, children's products' lead content, and poor quality electrical products.
- Includes in-store screening of products to ensure products are labeled, are contained in proper child-resistant packaging when required, and meet generally accepted industry voluntary standards. Includes on-site XRF testing when feasible.



INTERNET SURVEILLANCE

- No longer a new challenge – many firms sell their products exclusively from Internet websites; and there would be no CPSC oversight of these sellers at all if Internet surveillance was not conducted.
- CPSC dedicates investigative staff to Internet surveillance, some fulltime.



QUESTIONS

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