CPSC eFiling Meeting Log – Component Part Testing Discussion with Industry
3/12/2025

Attendees:

Jim Joholske	Consumer Product Safety Commission (CPSC)
Sabrina Keller	Consumer Product Safety Commission (CPSC)
Andrea Rucker-Yarosh	Consumer Product Safety Commission (CPSC)
Katherine Rickerson	Consumer Product Safety Commission (CPSC)
Mary House	Consumer Product Safety Commission (CPSC)
Shaun Keller	Consumer Product Safety Commission (CPSC)
Stephen Lee	Consumer Product Safety Commission (CPSC)
Stephanee Synnott	Consumer Product Safety Commission (CPSC)
Marcy Van Winkle	Consumer Product Safety Commission (CPSC)
Jonathan Wolfish	Guidehouse Federal (CPSC contract support)
Carla Garcia	Guidehouse Federal (CPSC Contract Support)
Ryan Bernstein	Guidehouse Federal (CPSC Contract Support)
Corey Whipple	Guidehouse Federal (CPSC Contract Support)
Brian Holsey	Excidion (CPSC Contract Support)
Rebekkah Colclasure	Bureau Veritas
David Graff	Bureau Veritas
Kelly Nasrandinaj	Bureau Veritas
Richard Rosati	Bureau Veritas
Sarah Shepard	Bureau Veritas
Stacy Stannard	Bureau Veritas
Pratik Ichhaporia	Eurofins
Stephanie Fok	Intertek
Rajath Kumar	Intertek
Andrew Loveland	Intertek
Tim O'Meara	Comverex, LLC
Taylor Gilman	Disney
Veronica LandaBeavers	Disney
Alex Arechiga	Gap Inc.
Amy Fox	Gap Inc.
Jessica Giffin	Kroger

Delores Haynes	LAT Apparel
Jennifer Grassmann	Lionel
Beth Ann Littman	Macy's
Victoria Maloney	My Bobs
Jeanne Mizek	Rooms To Go
Marissa Torres	Sauder
Matt Wolf	Tractor Supply

1. If a final product test report includes the component lab reports – will this suffice for component part testing certification?

- M. House explained that the finished product certificate must include all citations and labs reflecting tests conducted on component parts if such testing supports compliance of the finished product
- Currently, CPSC requests test reports supporting a certificate to verify compliance once a shipment is stopped for examination. Pursuant to 16 CFR part 1110 and 16 CFR part 1109, certificates have always required that all rule citations and test labs appear on the certificate.
- A lab stated that they currently do not include all component part citations and test labs on the finished product certificate, which they prepare on behalf of importers. This lab provides a service to their clients by reviewing and verifying all testing conducted, including component part testing, and conducting any additional required tests on the finished product. The lab creates a finished product test report for their clients that lists all labs, citations, and testing, but component tests and labs are not listed on the finished product certificate unless the certificate is based solely on component part testing done by other labs.
- M. House said that this practice is inconsistent with the statute, meaning section 14 of the CPSIA, the current part 16 CFR part 1110 (in effect since 2009), the revised part 1110, and 16 CFR 1109 (in effect since 2011).

2. What lab information is necessary to include in the final product certificate?

- M. House explained that parts 1110 and 1109 require that the product certifier (generally the importer for imported products) must include all component part testing done to support a certificate, including the citations tested, lab names, and lab dates on the finished product certificate.
- A lab expressed concern that their costs would increase if they make business changes to align with the requirement that each component part test/rule and lab be included on the finished product certificate.
- Other labs on the call indicated that they include on the finished product certificate citations and lab names for tests conducted on component parts, but do not necessarily at this time associate a test citation with a specific lab.
- CPSC staff stated that finished product certificates entered into the Product Registry and the CATAIR require that each test/rule citation be associated with the lab that performed the test.

3. Is final product testing required if all component parts have been tested independently?

- M. House stated that there are some tests that can only be performed on component parts (i.e., phthalates) and some tests that can only be performed on the finished product, even if all component parts were independently tested, such as the small parts test. Certifiers must ensure their products are tested as required by the applicable rules for each product and then reflected on the finished product certificate.

4. Utilizing eFiled data for risk assessment purposes

- A. Rucker-Yarosh said one benefit of eFiling using the Product Registry will be the standardization of data. This will allow EXIS to perform an additional review and crosscheck all components tested as reflected in the certificate data.
- If CPSC discovers that a finished product certificate includes invalid data, the shipment can be flagged and stopped for further examination.

5. Disclaimers, Testing Exclusions, and Labs listing N/A

- M. House said disclaimers are used when an importer doesn't need to file a certificate for their product because no regulations apply.
- Testing Exclusions must be used if a product is subject to a rule, but no testing occurred because of a testing exclusion within a rule. One example is wearing apparel subject to 16 CFR 1610, when apparel is not tested based on the exception in 1610.1(d) based on the weight or type of fabric. Children's wearing apparel must have a certificate and state the exception code in place of the name of the test lab. Adult wearing apparel relying on this exception does not require a certificate based on a Commission issued enforcement policy.
    - If a lab marks a test as N/A, it is unclear if they mean it wasn't required, or simply not performed.
- M. House suggested that each importer confirm with all their test labs whether N/A means there is a test exclusion or that testing was not conducted because the product is not subject to that rule/test.
    - M. House also encouraged all importers that certify finished products by relying on component part testing, or another party's testing or certification, to review the requirements of 16 CFR part 1109 to determine whether they are meeting the requirement to use due care when relying on someone else's testing and/or certification.