

## Transcript of CPSC Podcast 2020- Durable Infant or Toddler Products: Common Requirements

### **Slide 3**

Hi, my name is Sylvia Chen, and I want to welcome you to this podcast presentation today.

### **Slide 4**

As CPSC's Director of International Programs, Richard O'Brien stated: "design of safe products at the outset is critical." CPSC is a United States federal government agency charged with protecting the public from unreasonable risks of injury or death associated with the use of consumer products under the agency's jurisdiction. We have developed this podcast series not only to inform about regulations, standards, and other safety requirements, but also to emphasize the importance of designing products with safety considerations in mind, and to offer best practices for enhancing the safety of a variety of common consumer products.

### **Slide 5**

The series covers seven common consumer products and the requirements for keeping consumers safe, focusing on products affecting millions of consumers, such as electronics, apparel, bicycles, mattresses, infant and toddler products, carriages and strollers, and toys. In this podcast series, you can expect to learn about the key hazards and risks of the product, important design and manufacturing considerations, regulations and standards that CPSC uses to ensure product safety, best practices you can employ, and what resources are available to assist you in understanding and implementing the requirements.

The podcasts include English and Chinese slide decks and Chinese narration to make this important safety information as accessible as possible. Additionally, CPSC has established a dedicated email box, where listeners, at their convenience, can send in any questions, in English or Chinese. Our staff will monitor the email box and respond to your questions. Transcripts in English are available on this site.

### **Slide 6**

The slides used in this podcast are not a comprehensive statement of legal requirements or policy, and thus, should not be relied upon for that purpose. You should consult official versions of U.S. statutes and regulations, as well as published CPSC guidance, when making decisions that could affect the safety and compliance of products entering U.S. commerce. Note that references are provided at the end of the presentation.

### **Slide 7**

And now, I would like to introduce the presenter, Joseph Tsai, a Senior Compliance Officer at the U.S. Consumer Product Safety Commission. His covers common requirements for durable infant or toddler products.

## **Slide 7**

How are you? My name is Joseph Tsai. I am a Senior Compliance Officer at the U.S. Consumer Product Safety Commission (CPSC). Today, I will use Mandarin to explain to the manufacturers, exporters, and importers in China and the rest of the world, the common U.S. requirements for all durable infant or toddler products.

你好！我名字叫 Joseph 蔡。我是美国消费品安全委员会的资深合规官员。今天，我将用华语向在中国以及全世界华人生产，出口，和进口婴幼儿耐用产品的产业，说明美国婴幼儿耐用产品的共用要求。

## **Slide 8**

First, I want to explain what is a durable infant or toddler product.

首先，我先向各位解释什么是婴幼儿耐用产品。

Then I want to explain what the requirements are for durable infant or toddler products.

接着，我要向各位说明婴幼儿耐用产品需要遵守什么法规。

Then I want to explain what are the product registration and labeling requirements for durable infant or toddler under the Consumer Product Safety Improvement Act (CPSIA) of 2008.

然后，我要向各位说明婴幼儿耐用产品在 2008年消费品安全改进法案下的产品注册和标签要求。

Next, I will explain what are the regulations regarding third party testing and certification for children's products under the CPSIA.

然后，我要向各位说明消费品安全改进法案下之儿童产品的第三方测试和认证需求。

Finally, I want to remind everyone about other common requirements that pertain to lead, phthalates, and small parts.

最后，我要向诸君提醒其他的共用要求：铅，邻苯二甲酸盐（塑化剂）和小部件。

## **Slide 9**

What is a durable infant or toddler product?

那什么是婴幼儿耐用产品？

“Durable infant or toddler product” is defined as a durable product intended for use, or that may be reasonably expected to be used, by children under the age of 5 years.

“婴儿和幼儿耐用产品”被法律定义为给5岁以下儿童使用或可以合理预期使用的耐用产品。

The CPSIA requires the CPSC to promulgate consumer product safety standards for durable infant or toddler products.

2008年消费品安全改进法案要求 CPSC 颁布婴幼儿耐用产品的安全标准。

The law requires the standards to be the same as the voluntary standards or made more stringent if it reduces the risk of injury.

这个法律要求新的标准与现有的自愿标准相同，如果能降低受伤风险则新的标准可以更严格。

### **Slide 10**

What requirements must durable infant or toddler products comply with?

那婴幼儿耐用产品需要遵守什么法规？

First, they must comply with the performance requirements for each respective durable infant or toddler product.

第一，他们必须遵守其个别专属的产品规格。

Second, they must comply with the product registration and labeling requirements for durable infant or toddler products.

第二，婴幼儿耐用产品必须遵守产品注册和产品标签之规定。

Third, because durable infant or toddler's products are children's products, they must comply with the testing and certification requirements for children's products.

第三，因为婴幼儿耐用产品是儿童产品之一，因此婴幼儿耐用产品必须遵守儿童产品的第三方测试和认证之规定。

Other common requirements: lead (surface coating and content), phthalates, and small parts.

其他共同规定：铅，邻苯二甲酸盐（塑化剂）和小部件之规定。

### **Slide 11**

There are 27 different durable infant or toddler products. But today, we are not going to talk about these 27 different performance requirements. Why is that?

这里共有27种不同的婴幼儿耐用产品，所以有27种其个别专属的产品之规格。但是今天，我们不讨论这27种不同的产品规格。那这是为什么？

### **Slide 12**

The reason is simple! Since we started to enforce the requirements for durable infant and toddler's product in 2011, we have discovered a total of 388 violative products. Among them, 27 percent of the products violate the registration requirement, 5 percent violate the registration and labeling requirements, 4 percent violate the registration and certification requirements, and 28 percent violate the registration, labeling, and certification requirements. Only 36 percent violate the performance requirements. This means 64 percent (nearly 2/3) of the total violations are actually non-performance violations.

原因很简单！因为自2011年我们开始对婴幼儿耐用产品执法后，我们总共发现388件违规产品。这其中27%是注册违规，5%是注册违规加上标签违规，4%是注册违规加上认证违规，28%是注册违规加上标签和认证违规，仅仅只有36%是产品规格违规。也就是说非产品规格违规的居然占64%，也就是将近 2/3！

### **Slide 13**

Therefore, today, I want to explain to everyone the registration and labeling requirements for durable infant or toddler products.

因此，今天我想向大家解释婴幼儿耐用产品的消费者产品注册和产品标签之规定。

CPSIA requires a specific registration form and labeling for durable infant or toddler products.  
消费品安全改进法案明文规定婴幼儿耐用产品必须有特定的产品注册表和标签。

Registration form must be attached to the product.

产品注册表必须附在产品上。

Labeling must be on the product and its packaging.

产品标签必须在产品本身和产品包装上。

The on-product labeling must be permanent.

产品上的标签必须是永久性的。

The purpose of the registration and labeling requirement is to improve notification to product owners and to promote recall effectiveness.

产品注册表和产品标签是为了促进产品召回效能。

### **Slide 14**

What information satisfies the labeling requirements for durable infant or toddler products?

婴幼儿耐用产品的标签需要什么信息？

Name of manufacturer

制造商名称

Date of manufacture

生产日期

Model name/number

产品式样名称或型号

Product's city and country of origin

产品的原产国及城市

Include manufacturer's contact information (must be U.S. address and telephone number).

Let me repeat, manufacturer's contact information must be U.S. address and telephone number.

制造商的联系信息 (必须是美国地址和电话号码).

我再重复一次, 制造商的联系信息 必须是美国地址和电话号码).

## **Slide 15**

Next, I want to talk about registration requirements and the registration form for durable infant or toddler products.

接下来，我要谈谈婴幼儿耐用产品的产品注册要求和产品注册表。

Provide a postage-paid consumer registration form with each product.

产品必须有邮费已付的产品注册表。

Registration form must be attached to the product so a consumer notices it after purchasing the product.

注册表必须附在产品上，所以消费者在购买产品后注意到它。

The manufacturer's name and U.S. contact information, model name, and number must be on the registration form.

制造商的名称和制造商在美国的联系信息，产品的式样名称和型号必须已印在注册表上。

Must keep records of consumers who register their products with the manufacturer.

制造商必须保存消费者所注册的资料与记录。

Must provide an option for consumers to register online.

必须让消费者能在网上注册。

## **Slide 16**

Next, let's see an example of a product registration form.

接下来，让我们看看产品注册表的范例。

The upper portion is for consumers to retain.

上面是让是消费者保留的部分。

The lower portion is for consumers to mail back to the manufacturer.

下面是让消费者邮寄回给制造商的部分。

The left side is the front, and the right side is the back.

左手边是正面，右手边是背面。

The front side of the part consumers retain should include a purpose statement.

消费者所保留的部分，它的正面应有目的声明。

And its back side must have manufacturer's contact information, this includes address and registered website. If there is no registered website, then there must be an email address for the manufacturer.

并且其背面必须有制造商的联系信息，这包括地址和注册网站。如果没有注册的网站，则必须有电子邮件地址。

Must have pre-printed product information. This includes model name, model number, and the manufacturing date.

必须有预先印好的产品信息, 这包括 model 名称, model 编号, 和制造日期。

The part that consumers return to the manufacturer must be postage-paid so that consumers don't have to pay postage fee.

消费者寄出的部分, 必须已付邮费, 所以消费者不必付邮费。

The front side of the part that consumers return to the manufacturer must include the manufacturer's U.S. mailing address.

消费者寄出的部分, 正面必须有制造商的美国邮寄地址。

The back side of the part that consumers return to the manufacturer must have an area that allows consumers to fill out their contact information. This includes consumer's name, address, telephone number, and email address. The format must have blocks that would allow consumers to fill in alphabets.

消费者寄出的部分, 背面必须有让消费者填写其联系信息的地方, 这包括消费者的姓名, 地址, 电话号码和电子邮件地址。格式必须像这样一格格, 所以消费者可以填写英文字母。

In addition, the back side must have pre-printed product information. This includes model name, model number, and the manufacturing date.

此外, 背面必须有预先印好的产品信息, 这包括 model 名称, model 编号, 和制造日期。

### **Slide 17**

Next, let's use a different way to examine the product registration form. This portion is retained by the consumer.

接下来, 让我们用另一种方式来看看产品注册表。这是让消费者保留的部分。

This is the front side.

这是正面。

This is the back side.

这是背面。

The front side should have a purpose statement.

正面应有目的声明。

The back side must have manufacturer's contact information, this includes address and registered website. If there is no registered website, then it must have an email address for the manufacturer.

背面必须有制造商的联系信息, 这包括地址和注册网站。如果没有注册的网站, 则必须有电子邮件地址。

Must have pre-printed product information. This includes model name, model number, and the manufacturing date.

必须有预先印好的产品信息, 这包model 名称, model 编号, 和制造日期。

### **Slide 18**

Next, let's look at the product registration form. This is the part that consumers return to the manufacturer.

接下来, 让我们看一下产品注册表 消费者邮寄的部分。

This is the front side.

这是正面。

This is the back side.

这是背面。

The part that consumers return to the manufacturer must be postage-paid so that consumers don't have to pay postage fees.

消费者寄出的部分, 必须已付邮费, 所以消费者不必付邮费。

Of course, there should be a manufacture's US mailing address.

当然, 必须有制造商的美国邮寄地址。

The back side must have an area that allows consumers to fill out its contact information. This includes consumer's name, address, telephone number, and email address. The format must have blocks that would allow consumers to fill in alphabets.

背面必须有让消费者填写其联系信息的地方, 这包括消费者的姓名, 地址, 电话号码和 email 地址。格式必须像这样一格格所以消费者可以填写英文字母。

Must have pre-printed product information. This include model name, model number, and the manufacturing date.

必须有预先印好的产品信息, 这包括 model 名称, model 编号, 和制造日期。

### **Slide 19**

Next, I want to discuss the third party testing and certification for children's products.

接下来, 我要谈谈儿童产品的第三方测试和认证。

Durable infant and toddler's products are children's products; therefore, they must have third party testing and certification.

婴幼儿耐用产品是儿童产品之一, 所以婴幼儿耐用产品必须要有第三方测试和认证。

The CPSIA requires that each manufacturer must have children's products, including durable infant or toddler products, tested to the applicable requirements by a CPSC-accepted and accredited third party testing conformity laboratory.

2008年消费品安全改进法要求制造商必须将其儿童产品（包括婴幼儿耐用产品）给美国消费品安全委员会认可的第三方检测机构按照适用的美国法规检验。

After the testing, manufacturers must provide a Children's Product Certificate (CPC) based on passing test reports, and the CPC must be provided to the retailer and/or distributor and accompany the shipment at the time of importation into the United States.

经过检验后，制造商必须依第三方检测机构的检验报告提供一份儿童产品证书（CPC）。儿童产品证书必须提供给零售商和/或分销商，并在报关（美国海关）时随附。

## **Slide 20**

What information is required in a CPC?

那儿童产品证书须要有什么信息？

Identification of the product covered by this certificate.

产品名称。

Citation to each CPSC children's product safety rule to which this product is being certified.

列该产品所通过的每个CPSC儿童产品安全规则。

Identification of the importer or domestic manufacturer certifying compliance of the product:

Provide the name, full mailing address, and telephone number.

列签署该产品证书的进口商或(美国)国内制造商证的名称, 地址, 和电话号码。

Contact information for the individual maintaining records of test results: Provide the name, full mailing address, e-mail address, and telephone number of the person maintaining test records in support of the certification.

列检验报告持有者的联系信息: 姓名, 地址, email, 和电话号码。

Provide the date and place where this product was manufactured:

提供本产品的生产日期和其原产国及城市。

Provide the date(s) and place when the product was tested for compliance with the consumer product safety rule(s) cited above.

提供本产品检验的日期和地点。

Identify any third party, CPSC-accepted laboratory on whose testing the certificate depends:

Provide the name, full mailing address, and telephone number of the laboratory.

提供检验本产品的 CPSC 认可之第三方检测机构的名称, 地址和电话号码。

## **Slide 21**

CPSC's website has several examples of CPCs. Please check our website.

CPSC网址有多种儿童产品证书的范例, 请到我们的网站看一看。

## **Slide 22**

Lastly, I want to remind everyone about other common requirements for children's products.  
最后, 我想提醒大家其他儿童产品的共用要求。

The first requirement pertains to small parts. Durable infant and toddler products are for infants and toddlers; therefore, these products cannot have small parts.  
首先是有关小部件的问题。婴幼儿耐用产品是给婴幼儿用的, 因此当然不能有小部件。

The next requirement concerns lead levels.  
接下来是铅含量。

Lead content level (especially in plastic) cannot exceed 100 ppm in children's products.  
儿童产品的铅含量 (特别是在塑料中的铅含量) 不可超过 100 ppm。

Lead in paint cannot exceed 90 ppm.  
漆的铅含量不可超过 90 ppm。

Next is phthalates.  
接下来是塑化剂。

Each of these eight phthalates cannot exceed 0.1%.  
这八个塑化剂每个不可超过 0.1%

Applies to children's toys and child care articles that facilitate sleeping or feeding or help with sucking or teething of a child ages 3 and younger.  
适用于儿童玩具以及让3岁及以下儿童方便入睡, 喂食或帮助其吮吸或出牙的用品。

## **Slide 23**

Next, let's proceed with the case study for durable infant or toddler products.  
接下来, 让我们来进行婴幼儿耐用产品的案例分析。

## **Slide 24**

Which product below is a durable infant or toddler product?  
请问以下哪一个产品是婴幼儿耐用产品?

The product in the middle is a durable infant or toddler product. It is an infant bouncer seat.  
The product on the left is a teddy bear, and the product on the right is a bouncing ball. These two products are children's toys, not durable infant or toddler's products.  
中间的那一个产品是婴幼儿耐用产品。它是婴幼儿蹦蹦座。左侧的产品是玩具熊, 右侧的产品是弹跳球。这两种产品是儿童玩具, 不是婴幼儿耐用产品。

### **Slide 25**

Which product below is not a durable infant or toddler product?

请问以下哪一个产品不是婴幼儿耐用产品？

The pacifier is not a durable infant or toddler product.

奶嘴不是婴幼儿耐用产品。

### **Slide 26**

What information must the manufacturer place on durable infant or toddler products to meet all the labeling requirements?

请问婴幼儿耐用产品的标签需要什么信息？

Name of manufacturer

制造商名称

Date of manufacture

生产日期

Model name or number

产品式样名称或型号

Product's city and country of origin

产品的原产国及城市

Include manufacturer's contact information (must be U.S. address and telephone number).

制造商的联系信息 (必须是美国地址和电话号码)

Above information must be on the product and its packaging, and must be placed permanently on the product.

以上信息必须在产品本身及其包装上，并且在产品上的标签必须是永久性的。

### **Slide 27**

Next, let's take a look at the product registration card.

接下来，让我们看一下产品注册表。

What information must be on the part that the consumer retains?

消费者保留的部分需要什么信息呢？

The front side must include a purpose statement.

正面需要有目的声明。

The back side must have the manufacturer's contact information, which includes address and registration website. If there is no registration website, then it must have an email address for the manufacturer.

背面必须有制造商的联系信息, 这包括地址和注册网站。如果没有注册的网站, 则必须有电子邮件地址。

Must have pre-printed product information. This includes model name, model number, and the manufacturing date.

必须有预先印好的产品信息, 这包括model 名称, model 编号, 和制造日期。

### **Slide 28**

What information must be on the part that the consumer mails to the manufacturer?

消费者邮寄的部分需要有什么信息呢?

The front side must be postage-paid so that consumers don't have to pay postage fee.

正面必须已付邮费, 所以消费者不必付邮费。

Must have manufacture's U.S. mailing address.

必须有制造商的美国邮寄地址。

The back side must have an area that allows consumers to fill out their contact information.

This includes consumer's name, address, telephone number, and email address. The format must have blocks that would allow consumers to fill in alphabets.

背面必须有让消费者填写其联系信息的地方, 这包括消费者的姓名, 地址, 电话号码和 email 地址。格式必须像这样一格格, 所以消费者可以填写英文字母。

Must have pre-printed product information. This include model name, model number, and the manufacturing date.

必须有预先印好的产品信息, 这包括model 名称, model 编号, 和制造日期。

### **Slide 29**

If you want distribute the product pictured below in the United States, what should you prepare before you bring the product into the United States?

您希望在美国销售此产品 (婴儿浴座椅), 在将此产品带入美国之前, 您应该准备什么?

Make sure the product has the required labels for durable infant or toddler products. Make sure the on-product label is permanent.

确保产品本身和其包装上有永久性的婴幼儿耐用产品标签。

Make sure a registration form is attached to the product.

确保产品上附有产品注册表。

Get the product tested by a CPSC-accepted third party testing lab. Make sure the product is tested to all the applicable CPSC requirements.

让CPSC认可的第三方检测机构检验你的产品, 并确保本产品通过所有适用的CPSC法规。

Provide a children's product certificate (CPC) based on the third party test report, and provide the CPC when you file entry with U.S. Customs.

检验后,依第三方检测机构的检验报告提供一份儿童产品证书 (CPC),并在报关(美国海关)时随附。

### **Slide 30**

Thank you, and we hope you enjoyed this podcast. If you have any questions on the presentation, please do not hesitate to submit your questions in English or Chinese to the mailbox mentioned earlier: [CPSCinChina@cpsc.gov](mailto:CPSCinChina@cpsc.gov). This mailbox is routinely monitored.

### **Slides 32-35**

We also wish to remind viewers that CPSC has many technical documents and resources available in Chinese. At the conclusion of this presentation, we provide many links to resources viewers may find useful.

### **Slides 36-37**

We encourage viewers to be sure to check out CPSC's Regulatory Robot, available in English, Chinese, and several other languages. The Regulatory Robot is an automated tool that can help identify safety requirements for many different types of products. Many companies have found this tool to be extremely helpful.

### **Slides 38-45**

Please also see the following slides to view a variety of durable infant or toddler products specific resources.

### **Slide 43**

Thank you for downloading this presentation.