



Record of Commission Action
Commissioners Voting by Ballot*

Commissioners Voting: Chair Alexander D. Hoehn-Saric
 Commissioner Dana Baiocco
 Commissioner Peter A. Feldman
 Commissioner Richard Trumka Jr.
 Commissioner Mary Boyle

ITEM:

Renewal of Accreditation of the Step2 Company LLC Conformity Assessment Body as a
“Firewalled” Third Party Laboratory
(Briefing package dated July 13, 2022)

DECISION:

The Commission voted unanimously (5-0) to renew the accreditation of the Step2 Company LLC conformity assessment body as a firewalled third party laboratory.
The Commissioners issued a joint statement with their votes.

For the Commission:

Alberta E. Mills
Secretary

*Ballot vote due July 22, 2022
(Commissioner Trumka extended the vote due date from July 19 to July 22, 2022).

Attachment: Joint Statement by Chair Hoehn-Saric, Commissioners Baiocco, Feldman, Trumka and Boyle



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

**Joint Statement of Chair Alex Hoehn-Saric and Commissioners Dana Baiocco,
Peter A. Feldman, Richard R. Trumka Jr., and Mary T. Boyle
Regarding Their Vote to Approve Renewal of Accreditation for Step2 Firewalled
Laboratory
July 22, 2022**

Today, the Commission voted unanimously to approve the renewal of accreditation of the Step2 Company LLC laboratory as a “firewalled” lab to test children’s products to make sure they conform to our safety rules. This comes two years after the Commission initially approved Step2 as a firewalled laboratory and found, as required by the Consumer Product Safety Act, that the lab would provide equal or greater consumer safety protection than if the manufacturer were to use an independent lab, and that the lab had established procedures to protect against undue influence. Under our current regulations, we rely largely on accreditation organizations and third-party assessment bodies to evaluate a lab’s technical competence for certain testing methods and also its management and organization to ensure safeguards against undue influence.

This year, based on staff’s assessment of Step2’s application and staff’s recommendation to renew CPSC’s accreditation of its firewalled laboratory, we have voted to approve the renewal. However, we believe that the approval process can be strengthened and will be reexamining these processes going forward.

In the FY23 Operating Plan, we will be directing staff to prepare and present to the Commission a review of the CPSC-accepted firewalled lab process with recommendations to strengthen it. Congress instructed CPSC to periodically review and revise our requirements for testing labs to ensure the highest quality conformity assessment feasible. Now, more than a decade after Congress first permitted CPSC to create a process for approving firewalled labs, we want to reexamine that process – and the results.

We expect all testing labs—especially those that ensure children’s products conform to CPSC safety rules—will adhere to the highest standards of competency and impartiality.