

▶ Technical Opinion Letter for General Conformity Certification

A Smart Approach to Assess Compliance to CPSIA

BUSINESS CHALLENGE

How can you determine if your products must comply with the Consumer Product Safety Commission (CPSC) regulations? How can you know which rules, bans, regulations and standards are applicable to your product so that you can have confidence in issuing a General Conformity Certification (GCC) under the new Consumer Product Safety Improvement Act (CPSIA)?

Agents, importers and manufacturers are scrambling in response to this legislation which adopted new compliance requirements. New federal regulations require importers to issue a 'self-declaration' for their product. In this GCC document, you must list out all applicable regulations your product complies with under CPSC jurisdiction. All products subject to CPSC rules, bans, regulations and standards must provide a GCC for products manufactured on or after November 12, 2008.

SOLUTION

What is a Technical Opinion Letter for a GCC?

A Technical Opinion Letter for a GCC will identify if your products are subject to a CPSC rule, ban, regulation or standard. CPSIA requires both children and adult products applicable to CPSC regulations to submit a GCC. A Technical Opinion Letter will also give you the information you need to make decisions about your testing program. Our Bureau Veritas Engineering Services Group will review your products and recommend appropriate actions. A Technical Opinion Letter will provide you with a list of regulations applicable to your product, forming the basis for your preparation of a GCC.

What are the key benefits?

By using the Technical Opinion Letter, you can:

- Minimize uncertainty in self-declaring conformance to regulations
- Plan and develop your testing program with confidence in compliance
- Reduce time to market by knowing what your gaps are before shipment
- Avoid potential penalties by understanding what is needed

WHY CHOOSE BUREAU VERITAS?

Reputation – Over 30 years of technical and testing experience in consumer products.

Worldwide Locations – With locations close to sourcing and imported areas in over 40 countries, we offer you the convenience of global coverage with local service.

Technical Knowledge & Leadership – Evaluation and testing products annually worldwide provides a broad perspective of the hazards associated with a wide range of consumer products and most updated regulation information.

Personal Personalized Service – At Bureau Veritas, we are committed to meeting your needs and providing you with the highest levels of service.



RELATED SERVICES

Our services work together to help you minimize the risk of recalls and returns, protecting your brand equity.

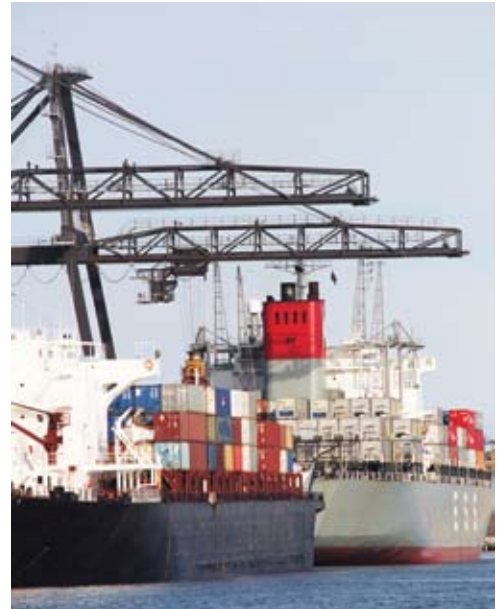
- Inspections
- Factory Assessments
- Security Assessments
- Social Audits
- Training

Ask us how these services can benefit you and your company.

OUR APPROACH

At Bureau Veritas, we are committed to helping you better prepare yourself for a GCC. We offer the following services to address your concerns and needs to support your compliance with CPSIA:

- **Identifying if a third-party testing report is required**
 - Define if your product falls under children or adult category by reviewing the product characteristics and foreseeable use aligned with CPSC practices.
 - Provide product testing follow-up service for all kinds of children products, which require third-party testing reports.
- **Listing out all the CPSC regulations applicable to your products in a Technical Opinion Letter**
 - We provide Technical Opinion Letters with different levels:
 - ▶ **Product Review** – A general listing of CPSC rules, bans, regulations and standards applicable on particular product categories.
 - ▶▶ **Product & Component Review** – A detail listing of CPSC rules bans regulations and standards, including requirements applicable on a particular part/material of a product.
 - ▶▶▶ **Product & Component Review, Missing Test Identification & Testing** – Review the document or certification provided by a client, compare it against the applicable CPSC rules, bans, regulations and standards and identify if any test required by CPSC is missing. Our engineers will then develop, conduct or subcontract the required testing.



FAQ

Is it the case that each shipment should come with a GCC?

No. CPSIA only requires each product applicable to CPSC rules, bans, regulations and standards be accompanied by the required GCC. The requirement applies to imports and products manufactured domestically.

For the GCC listed tests applicable to my products, can Bureau Veritas help to conduct testing?

Yes, we can help you to identify GCC regulatory tests relating to your products and conduct or subcontract the tests to validate GCCs.

If I already have a Technical Opinion Letter, do I still need to prepare a GCC?

Yes. A Technical Opinion Letter is not equal to a GCC. CPSIA requires you to issue a GCC for products applicable to CPSC rules, bans, regulations and standards. A Technical Opinion Letter is a document which helps you to collect the required information, decide on a testing program and then issue the GCC.



CONTACT

Please contact Bureau Veritas –
Engineering Services Division at
ESG-USmail@us.bureauveritas.com
ESG-Asiamail@hk.bureauveritas.com