

INFORMATION COLLECTION REQUEST

Supporting Statement

Third Party Testing of Children's Products

OMB Control Number: 3041-0159

A. Justification

1. Circumstances Necessitating Information Collection

Section 14 of the Consumer Product Safety Act ("CPSA") requires third party testing of children's products that are subject to an applicable children's product safety rule to ensure compliance with such rule. Based on this testing, manufacturers, including importers, and private labelers are required to certify compliance of their products to the applicable standards. CPSC's children's product safety rules are listed in Appendix A. For example, CPSC has issued more than twenty rules for durable infant or toddler products under section 104 of the Consumer Product Safety Improvement Act (CPSIA). The Federal Hazardous Substances Act (FHSA) and the CPSA also authorize the Commission to establish consumer product safety rules, which may also be children's product safety rules. Such rules require certain recordkeeping, product labelling, and/or instruction material to inform the public of certain hazards and the safe use of the product as well as to assist the Commission, the manufacturers, and the public in identifying products that fail to comply with a children's product safety rule. This information collection request covers:

- the recordkeeping requirements set forth in a final rule on *Testing and Labeling Pertaining to Product Certification* (16 CFR part 1107; the testing rule);
- the recordkeeping and third party disclosure requirements set forth in a final rule on *Conditions and Requirements for Relying on Component Part Testing or Certification, or Another Party's Finished Product Testing or Certification to Meet Testing and Certification Requirements* (16 CFR part 1109; the component part rule);
- marking, labeling, and instructional literature requirements contained in rules for durable infant and toddler products issued under section 104 of the CPSIA (section 104 rules);
- additional requirements such as those set forth in the Certificates of Compliance rule (16 CFR part 1110), the Button Cell or Coin Batteries rule (16 CFR part 1263), the Clothing Storage Units rule (16 CFR part 1261), the Requirements for Electrically Operated Toys or Other Electrically Operated Articles Intended for Use by Children (16 CFR 1505), and the Marking of Toy, Look-Alike, and Imitation Firearms (16 CFR part 1272); and,
- additional recordkeeping requirements such as those set forth in the ban on articles known as "baby bouncers" or "walker-jumpers," or similar articles that are not covered by 16 CFR 1216 and that are not also covered by the testing rule or the 104 rules. (baby bouncer/walker-jumper rule, 16 CFR 1500.18(a)(6) and 1500.86(a)(4)).

The following is a more complete discussion of these information collections.

Testing and Certification: On November 8, 2011, the Commission issued two rules for

implementing third party testing and certification of children's products, as required by section 14 of the Consumer Product Safety Act (CPSA):

- *Testing and Labeling Pertaining to Product Certification* (76 FR 69482, codified at 16 CFR part 1107; the testing rule); and
- *Conditions and Requirements for Relying on Component Part Testing or Certification, or Another Party's Finished Product Testing or Certification to Meet Testing and Certification Requirements* (76 FR 69547, codified at 16 CFR part 1109; the component part rule).

The testing rule establishes requirements for manufacturers to conduct initial third party testing and certification of children's products, testing when there has been a material change in the product, continuing testing (periodic testing), and guarding against undue influence. A final rule on *Representative Samples for Periodic Testing of Children's Products* (77 FR 72205, Dec. 5, 2012) amended the testing rule to require that representative samples be selected for periodic testing of children's products.

The component part rule is a companion to the testing rule that is intended to reduce third party testing burdens, by providing all parties involved in the required testing and certifying of children's products the flexibility to conduct or rely upon testing where testing is the easiest and least expensive to accomplish. Certification of a children's product can be based upon one or more of the following: (a) component part testing; (b) component part certification; (c) another party's finished product testing; or (d) another party's finished product certification.

Section 1107.26 of the testing rule states the records required for testing and selecting representative samples. 16 CFR 1107.26. Required records include a certificate, and records documenting third party testing and related sampling plans. These requirements largely overlap the recordkeeping requirements in the component part rule, codified at 16 CFR 1109.5(g). Duplicate recordkeeping is not required; records need to be created and maintained only once to meet the applicable recordkeeping requirements. The component part rule also requires records that enable tracing a product or component back to the entity that had a product tested for compliance; the rule also requires attestations of due care to ensure test result integrity.

Because these records largely overlap, for this renewal, we are streamlining the burden analysis and combining all recordkeeping for testing and certification into one estimate, as explained further in this notice.

New Children's Product Rules: Since the last renewal of this collection of information, CPSC has issued four children's product rules (not including rules issued under section 104 of the Consumer Product Safety Improvement Act of 2008 CPSIA) that contain testing, marking, labeling, and certification requirements for children's products:

- (1) Safety Standard for Clothing Storage Units (CSUs) (16 CFR part 1261);
- (2) Safety Standard for Magnets (16 CFR part 1262) (does not contain labeling requirements);
- (3) Safety Standard for Button Cell or Coin Batteries and Consumer Products Containing Such Batteries (Button Battery) (16 CFR part 1263); and

(4) (4) Marking of Toy, Look-Alike, and Imitation Firearms (16 CFR part 1272; PRA burden addressed in 16 CFR part 1250).

In this renewal, we include the burden estimate for children's CSUs and non-toy children's products containing magnets in this collection of information. The Button Battery rule already expanded this collection of information to include the certification and labeling of non-toy children's products that contain button batteries and we list it here for completeness. Toy imitation firearms are already included in this collection pursuant to section 4.30 of ASTM F963, as required in 16 CFR part 1250. The burden estimate for these new rules is included in the analysis under the Testing and Certification.

Section 104 Rules: The Commission has issued 28 rules for durable infant and toddler products under section 104 of the Consumer Product Safety Improvement Act of 2008 (CPSIA), codified in 15 U.S.C. 2056a (section 104 rules). Section 104 rules that have been issued, to date, appear in Table 1. Each section 104 rule contains requirements for marking, labeling, and instructional literature:

- Each product and the shipping container must have a permanent label or marking that identifies the name and address (city, state, and zip code) of the manufacturer, distributor, or seller.
- A permanent code mark or other product identification shall be provided on the product and its package or shipping container, if multiple packaging is used. The code will identify the date (month and year) of manufacture and permit future identification of any given model.

Each standard also requires products to include easy-to-read and understandable instructions regarding assembly, maintenance, cleaning, use, and adjustments, where applicable. *See, e.g.*, sections 8 (marking and labeling) and 9 (instructional literature) of every ASTM voluntary standard incorporated by reference into a CPSC mandatory standard, as listed in Table 12.B.

OMB has assigned control numbers for the estimated burden to comply with marking and labeling requirements in each section 104 rule. With this renewal, CPSC is moving the marking and labeling burden requirements for two additional section 104 rules that have been issued since the last renewal in 2022, into the collection of information for Third Party Testing of Children's Products (bold font in Table 12.B). The paperwork burdens associated with the section 104 rules are appropriately included in the collection for Third Party Testing of Children's Products because all the section 104 products are also required to be third party tested. Having all of the burden hours under one collection for children's products provides one OMB control number and eases the administrative burden of renewing multiple collections. CPSC will discontinue using the OMB control numbers currently assigned to individual section 104 rules. The discontinued OMB control numbers are listed in Table 1.

eFiling Revision to 16 CFR part 1110: Section 14(a) of the CPSA requires that manufacturers (including importers) and private labelers issue certificates for all consumer products subject to a consumer product safety rule under the CPSA, or a similar rule, ban, standard, or regulation under any other law enforced by the Commission, that are imported for consumption or warehousing or distributed in commerce. 15 U.S.C. 2052(a)(11)-(12); 15 U.S.C. 2063(a)(1). Children's products introduced to the U.S. market must have a Children's Product Certificate (CPC) which, if imported, must be electronically filed with U.S. Customs and Border Protection at the time of filing entry.

The final rule revising part 1110 details the eFiling requirement and the burden of eFiling CPCs. 90 FR 1800, 1838-39 (Jan. 8, 2025). For most imported products the effective date of this requirement is July 8, 2026. Products imported from a Foreign Trade Zone (FTZ) must comply with the eFiling requirement by January 8, 2027.

Safety Standard for Button Cell or Coin Batteries and Consumer Products Containing Such Batteries (16 CFR part 1263): In February 2023, as required by Reese’s Law, CPSC issued an NPR to eliminate or adequately reduce the risk of injury from ingestion of button cell or coin batteries by children six years old and younger. After the NPR, UL updated their voluntary standard for button cell or coin batteries, and on September 21, 2023, the Commission published a direct final rule (DFR) to incorporate by reference UL 4200A-2023, *Standard for Safety for Products Incorporating Button Batteries or Coin Cell Batteries*. Section 2(a)(2) of Reese’s Law mandates warning label requirements on non-toy children’s products that contain a button cell or coin battery. Warnings are required:

- On the packaging of consumer products containing button cell or coin batteries (15 U.S.C. 2056e(a)(2)(A));
- In any literature, such as a user manual, that accompanies a consumer product containing button cell or coin batteries (15 U.S.C. 2056e(a)(2)(B));
- As practicable, directly on a consumer product that contains button cell or coin batteries in a manner visible to the consumer upon installation or replacement of the button cell or coin battery (15 U.S.C. 2056e(a)(2)(C)(i));
- As practicable, in the case of a product for which the battery is not intended to be replaced or installed by the consumer, directly on the consumer product in a manner that is visible to the consumer upon access to the battery compartment, except that if it is impracticable to label the product, this information shall be placed on the packaging or instructions (15 U.S.C. 2056e(a)(2)(C)(ii)).

Safety Standard for Clothing Storage Units (16 CFR part 1261): In November 2022, CPSC published a consumer product safety standard for CSUs to protect children from tip-over-related death or injury, with an effective date of May 24, 2023. However, in December 2022, the President signed into law the STURDY legislation, which required CPSC to either develop and promulgate a new consumer product safety standard for CSUs that meets certain requirements specified in STURDY or determine that a voluntary standard exists that meets STURDY’s requirements. On April 19, 2023, the Commission determined that ASTM F2057-23, *Standard Safety Specification for Clothing Storage Units*, is a voluntary standard that meets the requirements of STURDY. Based on that determination, the Commission issued a direct final rule adopting the requirements of ASTM F2057-23 as required by STURDY. The revised CSU rule includes requirements for marking, labeling, and instructional literature that were consistent with the November 2022 final rule. Accordingly, the Commission retained the collection of information already approved under *Safety Standard for Clothing Storage Units* (OMB Control Number 3041-0191). Children’s CSUs were included in that burden estimate, providing that the total hourly burden of the recordkeeping associated with CPCs for children’s CSUs is 63 hours. 87 FR 72653. In this renewal, we move and include the burden estimate for children’s CSUs into this collection of information for children’s products.

Safety Standard for Magnets (16 CFR part 1262): On September 21, 2022, the Commission published a final rule to address hazards associated with ingestion of one or more high-powered magnets, which can interact internally through body tissue, potentially leading to acute and long-

term health consequences or death. The rule establishes requirements for subject magnet products that are designed, marketed, or intended to be used for entertainment, jewelry (including children's jewelry), mental stimulation, stress relief, or a combination of these purposes, and that contain one or more loose or separable magnets, but the subject products do not include magnet products sold and/or distributed solely to school educators, researchers, professionals, and/or commercial or industrial users exclusively for educational, research, professional, commercial, and/or industrial purposes. The Safety Standard for Magnets does not contain labeling requirements but does require that children's products containing magnets be third party tested and certified as compliant with the magnet rule. 87 FR 57756, 57788. Accordingly, the burden of generating certificates, associated records, and eFiling is included in this collection of information.

Marking of Toy, Look-Alike, and Imitation Firearms (16 CFR part 1272): The Federal Energy Management Improvement Act Update transferred the authority for regulating the marking of toy, look-alike, and imitation firearms from the Department of Commerce to the CPSC. The Commission issued a direct final rule to adopt the Department of Commerce rule effective June 26, 2023. Toy guns are children's products currently regulated under CPSC's mandatory toy standard. Specifically, toy guns are subject to the requirements for toy gun markings contained in section 4.30 of ASTM F963-17 that are incorporated by reference at [16 CFR 1250.2](#). The requirements of section 4.30 are in turn based on the requirements in the Department of Commerce regulation at [15 CFR part 272](#). Accordingly, the paperwork burden for marking and labeling of toy imitation firearms are within the scope of this collection of information.

Electrically Operated Toys and Other Articles: The requirements for electrically operated toys and other electrically operated articles intended for use by children are set forth in 16 CFR part 1505. The regulation establishes certain criteria to use in determining whether electrically operated toys and other electrically operated children's products are banned and requires that certain warning and identification labeling be included on both the product and the packaging. The regulation also requires that manufacturers establish a quality assurance program to assure compliance and to keep records pertaining to the quality assurance program. Additionally, manufacturers or importers must keep records of the sale and distribution of the products.

Baby-Bouncer/Walker-Jumper Rule: The requirements for baby bouncers, baby walkers, and similar articles that are not covered by 16 CFR part 1216 (Safety Standard for Infant Walkers) are set forth under 16 CFR 1500.18(a)(6) and 1500.86(a)(4). These regulations establish criteria to use in determining whether certain baby-bouncers, walkerjumpers, or similar products are banned. The regulation requires that each product be labeled with information that will permit future identification by the manufacturer of the particular model of bouncer or walker-jumper. In addition, manufacturers must maintain records of sales, distribution, and results of tests and inspections for three years and make such records available to CPSC, upon request. Products covered under this regulation are not duplicative of an existing section 104 rule.

2. How, by Whom, and for What Purpose Information Is Used

Recordkeeping Requirements: The testing rule and the component part rule each have recordkeeping requirements that largely overlap. Section 1107.26 of the testing rule requires each manufacturer or importer of a children's product subject to a children's product safety rule to establish and maintain the following records:

- a copy of the Children’s Product Certificate (§ 1107.26(a)(1));
- records of each certification test (§ 1107.26(a)(2));
- records of periodic tests, production tests, and tests by laboratories accredited to ISO/IEC 17025, as applicable (§ 1107.26(a)(3));
- records documenting the basis for selection of representative samples for periodic testing purposes (§ 1107.26(a)(4));
- records of descriptions of all material changes in product design, manufacturing process, and sourcing of component parts, the certification tests run, and the test values (§ 1107.26(a)(5)); and
- records of undue influence procedures (§ 1107.26(a)(6)).

Section 1109.5(g) of the component part rule requires the creation and maintenance of specific data points, as well as documents that each certifier and testing party must provide, either in hard copy or electronically, to a another party who intends to rely on such documentation to issue a certificate:

- *Identification of the component part or the finished product tested;*
- *Identification of a lot or batch number, or other information sufficient to identify the component parts or finished products to which the testing applies;*
- *Identification of the applicable rules, bans, standards, and regulations for which each component part or finished product was tested;*
- *Identification of the testing method(s) and sampling protocol(s) used;*
- *The date or date range when the component part or finished product was tested;*
- *Test reports that provide the results of each test on a component part or finished product, and the test values, if any;*
- *Component part certificate(s) or finished product certificate(s), if any;*
- Identification of the party that conducted each test (including testing conducted by a manufacturer, testing laboratory, or third party conformity assessment body), and an attestation by the party conducting the testing that all testing of a component part or finished product by that party was performed in compliance with applicable provisions of section 14 of the CPSA, part 1107 of this chapter, or any more specific rules, bans, standards, or regulations;
- Records to support traceability as defined in § 1109.4(m), which includes the identity of all testing parties of a component part of a consumer product or a finished product, including the name and address of each testing party and any party that conducted testing on the component part or finished product. Parties that conduct testing may include a manufacturer, a supplier, a testing laboratory, or a third party conformity assessment body; and
- An attestation by each certifier and testing party that while the component part or finished product was in its custody, it exercised due care to ensure compliance with test result integrity requirements set forth in § 1109.5(b), including that: (1) proper

management and control of all raw materials, component parts, subassemblies, and finished products is established and maintained for any factor that could affect the finished product's compliance with all applicable rules; (2) the manufacturing process does not add or result in a prohibited level of a chemical from any source, such as the material hopper, regrind equipment, or other equipment used in the assembly of the finished product; and (3) no action or inaction subsequent to testing and before distribution in commerce has occurred that would affect compliance, including contamination or degradation.

Items that overlap with the testing rule are indicated in italics above. The first five items are data points that are usually included on a test report. Test reports are also required to be maintained under the testing rule. Component part and finished product certificates, the seventh item, are also a requirement in the testing rule. All of these records need to be created and maintained only once to meet the applicable recordkeeping requirements. The only unique records required in the component part rule are the last three bullets, which include two attestations and records that demonstrate who is responsible for having component parts of the product tested.

Unlike the testing rule, the component part rule requires records, or electronic access to records, to be provided to a third party, when that party intends to rely on such records to certify a product. The component part rule does not require that the records actually be physically provided to another party; electronic access to records is sufficient. Under both rules, § 1107.26(b) and § 1109.5(j), records must be maintained for 5 years and must be made available, either in hard copy or electronically, for inspection by the CPSC, upon request.

Section 104 Rules: Each section 104 rule contains requirements for marking, labeling, and instructional literature that are disclosure requirements. Individual section 104 rules specify that:

- Each product and the shipping container must have a permanent label or marking that identifies the name and address (city, state, and zip code) of the manufacturer, distributor, or seller.
- A permanent code mark or other product identification shall be provided on the product and its package or shipping container, if multiple packaging is used. The code will identify the date (month and year) of manufacture and permit future identification of any given model.

Products are also required in the standards to provide easy-to-read and understandable instructions regarding assembly, maintenance, cleaning, use, and adjustments, where applicable. Manufacturers are responsible for compliance with the marking, labeling, and instructional literature requirements in each children's product safety rule, including section 104 rules and the electrically-operated toys rule. Such requirements are intended to aid the manufacturer, importer, CPSC, and consumers in product identification and recall efforts, should a safety defect arise, as well as to inform consumers how to safely assemble and use the relevant consumer product.

eFiling of Certificates of Compliance (16 CFR part 1110): Finished product certifiers are required to maintain finished product certificates and the records supporting such certificates for at least five years from the certificate creation date, including (a) Records of test results on which a GCC is based, and records described in §§ 1109.5(g) and (j) (where applicable); (b) Records of test results and other records on which a CPC is based, as required by § 1107.26, and § 1109.5(g) and (j) (where applicable); and (c) Records of test results and other records on which a component part certificate is based, as required by §1109.5(g) and (j). CPSC will collect this CPC data electronically at the time of importation to target shipments for inspection and to assist in identifying noncompliant products.

Electrically Operated Toys and Other Articles: The requirements for electrically operated toys and other electrically operated articles intended for use by children are set forth in 16 CFR part 1505. The regulation establishes certain criteria to use in determining whether electrically operated toys and other electrically operated children's products are banned and requires that certain warning and identification labeling be included on both the product and the packaging. The regulation also requires that manufacturers establish a quality assurance program to assure compliance and to keep records pertaining to the quality assurance program. Additionally, manufacturers or importers must keep records of the sale and distribution of the products.

Baby-Bouncer/Walker-Jumper Rule: The requirements for baby bouncers, baby walkers, and similar articles that are not covered by 16 CFR part 1216 (Safety Standard for Infant Walkers) are set forth under 16 CFR 1500.18(a)(6) and 1500.86(a)(4). These regulations establish criteria to use in determining whether certain baby-bouncers, walker-jumpers, or similar products are banned. The regulation requires that each product be labeled with information that will permit future identification by the manufacturer of the particular model of bouncer or walker-jumper. In addition, manufacturers must maintain records of sale, distribution, and results of tests and inspections for 3 years and make such records available to CPSC, upon request. Products covered under this regulation are not duplicative of an existing section 104 rule.

3. Consideration of Information Technology

The testing and component part rules allow records to be maintained electronically and provided in that form to the Commission, upon request. The component part rule also allows records to be accessed by all parties electronically. Manufacturers and importers may use any improvements in information technology they deem suitable for compiling and maintaining the records required by the regulations.

4. Efforts to Identify Duplication and Similar Information Already Available

Testing Rule: The recordkeeping requirements allow a manufacturer to establish that a product was certified properly before it enters commerce and has been subjected to periodic testing to ensure continued conformity with all applicable CPSC rules, including testing after a material change in the product's design or manufacturing processes. Consequently, unless manufacturers are relying on component part testing as described below, it is unlikely that the required information is duplicated or already available from other sources.

Component Part Rule: Certified products and their component parts, if tested separately, must be traceable to the parties conducting and procuring third party testing. The required documentation is

largely the type of information that is already maintained by testing parties and certifiers on test reports. However, the final component part rule requires such information to be provided to, or available to, third parties in the supply chain, such as manufacturers and importers, who intend to rely on such testing or certification to certify the finished product. Multiple parties are not required to keep duplicate records under the component part rule, which allows a party who conducts testing on component parts to make such testing and certification records available electronically. As long as third parties who rely on these records to certify a product continue to have access to the required records, and can make the records available to the CPSC as required by the rule, they do not need to maintain them separately. It is unlikely that the required information and records are available from other sources.

Section 104 Rules, Electrically Operated Toys Rule, and Baby-Bouncer/Walker-Jumper Rule: Manufacturers are required by rule to place certain labels and warnings on the product, and certain warnings and instructions must also accompany each product. We are aware of no other information sources for these instructions and warnings that would be as readily available to the consumer.

In 2019 CPSC discontinued control number 3041-0035, requirements for electrically operated toys, and moved the burden estimate to the third party testing of children's products collection (OMB control number 3041-0159) to avoid double counting the burden, because most of the recordkeeping requirements of the electrically-operated toys and other articles rule are the same as those of the testing rule.

Table 1. List of Discontinued OMB Control Numbers Included under 3041-0159

Discontinued OMB Control Nbr	16 CFR	Standard	Final Rule/PRA Update
3041-0145	1215	Safety Standard for Infant Bath Seats	75 FR 31691 (June 4, 2010); PRA update: 78 FR 73506 (Dec. 6, 2013)
3041-0141	1216	Safety Standard for Infant Walkers	75 FR 35266 (June 21, 2010); PRA Update: 78 FR 40444 (July 5, 2013)
3041-0150	1217	Safety Standard for Toddler Beds	76 FR 78 FR 22019 (April 20, 2011); PRA Update: 79 FR 26417 (May 8, 2014)
3041-0157	1218	Safety Standard for Bassinets and Cradles	78 FR 63019 (Oct 23, 2013)
3041-0147	1219	Safety Standard for Full-Size Baby Cribs	75 FR 81766 (Dec 28, 2010) PRA Update: 79 FR 12185 (March 4, 2014)
3041-0147	1220	Safety Standard for Non-Full-Size Baby Cribs	75 FR 81766 (Dec 28, 2010) PRA Update: 79 FR 12185 (March 4, 2014)
3041-0152	1221	Safety Standard for Play Yards	78 FR 50328 (Aug. 19, 2013); PRA Update: 80 FR 59139 (Oct. 1, 2015)
3041-0160	1222	Safety Standard for Bedside Sleepers	79 FR 2581 (Jan. 15, 2014)
3041-0155	1223	Safety Standard for Infant Swings	77 FR 66703 (Nov 7, 2012) PRA Update: 80 FR 60885 (Oct. 8, 2015)
3041-0149	1224	Safety Standard for Portable Bed Rails	77 FR 12182 (Feb 29, 2012) PRA Update: 80 FR 33248 (June 11, 2015)
3041-0158	1225	Safety Standard for Hand-Held Infant Carriers	78 FR 73415 (Dec 6, 2013)
3041-0162	1226	Safety Standard for Soft Infant and Toddler Carriers	79 FR 17422 (March 28, 2014)
3041-0164	1227	Safety Standard for	79 FR 13208 (Mar 10, 2014)

		Carriages and Strollers	
3041-0167	1228	Safety Standard for Sling Carriers	82 FR 8671 (Jan 30, 2017)
3041-0174	1229	Safety Standard for Infant Bouncer Seats	82 FR 43470 (Sep 18, 2017)
3041-0166	1230	Safety Standard for Frame Child Carriers	80 FR 11113 (Mar 2, 2015)
3041-0173	1231	Safety Standard for High Chairs	83 FR 28358 (Jun 19, 2018)
3041-0172	1232	Safety Standard for Children's Folding Chairs and Stools	82 FR 59505 (Dec 15, 2017)
3041-0170	1233	Safety Standard for Hook-On-Chairs	81 FR 17062 (Mar 28, 20106)
3041-0171	1234	Safety Standard for Infant Bath Tubs	82 FR 15615 (Mar 30, 2017)
3041-0175	1235	Safety Standard for Baby Changing Products	83 FR 29672 (Jun 26, 2018)
3041-0177	1236	Safety Standard for Infant Sleep Products	86 FR 33022 (Jun 23, 2021)
3041-0178	1237	Safety Standard for Booster Seats	83 FR 30837 (Jul 2, 2018)
3041-0179	1238	Safety Standard for Stationary Activity Centers	84 FR 28205 (Jun 18, 2019)
3041-0182	1239	Safety Standard for Gates and Enclosures	85 FR 40100 (Jul 6, 2020)
3041-0185	1241	Safety Standard for Crib Mattresses	87 FR 8640 (Feb 15, 2022)
3041-0197*	1242	Safety Standard for Nursing Pillows	89 FR 85388 (Oct 25, 2024)
3041-0202*	1243	Safety Standard for Infant Support Cushions	89 FR 87467 (Nov 4, 2024)

* Request for discontinuation to be submitted before the end of 2028.

5. Impact on Small Business

Recordkeeping Requirements: Although many small businesses are required to keep records for children's product testing and certification, small businesses have the flexibility to establish and maintain records required by the testing rule and the component part rule in any manner or format provided they contain the information required by the rules and meet the availability requirements of the rules. The documentation required by the component part rule largely overlaps with recordkeeping required in the testing rule. Although in some instances multiple parties may keep copies of the same records, they are not required to do so. Access to the same records electronically is allowed by the component part rule. Finally, using component part testing is voluntary. To the extent that small businesses do not achieve a cost savings by conducting component part testing, they are not required to use it in certifying children's products.

Marking, Labeling, and Instructional Material Requirements: The impact on small businesses for the marking, labeling and instructions required have been addressed during each section 104 rulemaking procedure. Generally, marking, labeling, and instruction requirements have not been found to significantly impact small businesses. The electrically operated toys rule requires labeling on the products, outer packaging, and instruction sheets. In the research performed for the section

104 rules, staff found that labeling costs tend to be low in general for all firms, large and small. Therefore, the labeling requirements for electrically operated toys are not expected to significantly impact small businesses either.

CPSC provides a variety of resources to help both new and experienced small businesses learn about safety requirements that apply to consumer products, including the CPSC Regulatory Robot, and small business education videos. Many of these resources can be accessed online at: <https://www.cpsc.gov/Business--Manufacturing/Small-Business-Resources>.

6. Consequences of Less Frequent Information Collection and Technical or Legal Obstacles

Testing Rule: Failure to provide the information required would impair the CPSC's ability to determine whether a manufacturer is complying with the testing and certification requirements of section 14 of the CPSA and the requirements of the testing rule.

Component Part Rule: Without appropriate recordkeeping, allowance of component part testing could lead to degradation in compliance of finished products. Accordingly, the component part rule requires documentation sufficient to demonstrate the component part's compliance with the standards tested, and that enable component parts to be traced back to the party that had them tested, and to the third party laboratory that conducted the tests. Any less documentation and recordkeeping would not achieve this purpose, and would impede CPSC's ability to investigate compliance violations and enforce testing and certification rules for children's products.

Section 104 Rules: Stakeholders, consumers, and the government rely on product marking, labeling, and instructions to inform about safe use and assembly of products and to identify products for recall.

eFiling of Certificates of Compliance (16 CFR part 1110): The eFiling program allows CPSC to use algorithms to interdict high risk consumer products at U.S. ports. CPSC has limited ability to monitor the millions of consumer products, including e-commerce shipments, imported daily, as well as those under the *de minimis* exemption (less than \$800). eFiling enables CPSC and CBP to use certificate data, which has been required since 2008 but not electronically collected, to more efficiently target high-risk imported products. eFiling makes it more difficult for foreign manufacturers who ignore existing testing and certification requirements to evade detection. eFiling also reduces inspection frequency and hold times for compliant importers – rewarding firms with a record of compliance and enabling their imports to move more quickly. Less frequent eFiling collection means a greater number of unsafe products coming into the country and into consumers' homes.

Additional Collections: As with the Section 104 rules, stakeholders, consumers, and the government rely on product marking, labeling, and instructions to inform about safe use and assembly of products containing button cell or coin batteries, CSUs, electrically operated toy products and to identify products for recall. Additionally, the recordkeeping requirements will assist in the identification of products that are found not to be compliant with the rule. Stakeholders, consumers, and the government rely on product marking, and record keeping to identify consumer products containing button cell or coin batteries, CSUs, and baby-bouncer/walker-jumper products that are found not to be compliant with rule and possibly subject to a recall.

7. Consistency with the guidelines in 5 CFR 1320.5(d)(2)

The testing and component part rules are consistent with the guidelines in 5 CFR § 1320.5(d)(2) except (iv). Both the testing rule and the component part rule require that the records be maintained for 5 years (5 CFR 1107.26(b) and 5 CFR 1109.5(j), respectively). The 5-year record retention requirement was selected to be consistent with the 5-year statute of limitations in 28 U.S.C. § 2462.

The requirements of the section 104 rules, the electrically-operated toys rule, and baby-bouncer/walker-jumper rule are consistent with the guidelines in 5 CFR § 1320.5(d)(2).

8. Agency's Federal Register (FR) Notice and Related information

On July 11, 2025, a 60-Day Federal Register Notice was published at 90 FR 30887. The Commission received one comment in support of third-party testing.

Comment

I think it is a good idea to continue third-party testing to determine safety of children's products. Good job on protecting our kids. Thank you.

Stakeholder Outreach

Testing and Component Part Rules: Stakeholders were given an opportunity to comment on the proposed recordkeeping requirements for the testing and component part rules as part of the rulemaking process for parts 1107 and 1109. A notice of proposed rulemaking was published in the *Federal Register* for both rules on May 20, 2010: 75 FR 28336 (testing rule) and 75 FR 28208 (component part rule). The CPSC's responses to comments appear in the final rules published on November 8, 2011: 76 FR 69482 (testing rule) and 76 FR 69547 (component part rule). Stakeholders were also given an opportunity to comment on recordkeeping requirements in an amendment to the testing rule that requires the selection of representative samples and associated recordkeeping. A notice of proposed rulemaking on this amendment was published in the *Federal Register* on November 8, 2011, 76 FR 69586. The CPSC responded to one comment on the recordkeeping burden in the final rule implementing the representative sample requirement, which was published in the *Federal Register* on December 5, 2012, at 77 FR 72205. Stakeholders were also given the opportunity to comment on reducing third party testing burden associated with the testing of children's products pursuant to a request for comment issued by the Commission on November 8, 2011 (76 FR 69596).

Section 104 Rules: Stakeholders had the opportunity to comment on marking, labeling, and instruction requirements in each section 104 rule. Sections 4 and 12 list each section 104 rule. Section 4 includes a citation to the *Federal Register* notice for each final rule, and a citation for any burden renewal (PRA Update). The bolded standards are new standards issued since the last PRA update for this collection regarding Third Party Testing of Children's Products.

Additional Collections: Stakeholders were able to submit comments through notice and comment rulemaking for products that contain button cell or coin batteries, CSUs, and magnets. The electrically operated toys rule and the baby-bouncer/walker-jumper rule and their recordkeeping and

labeling requirements predate the Commission. The public last had an opportunity to comment on the requirements of the electrically operated toys rule and the baby-bouncer/walker jumper rule in 2019 when CPSC sought approval to include the information collections under the Third Party Testing for Children's Products collection (OMB Control No. 3041-0159. A *Federal Register* notice for the PRA update was published on March 13, 2019 (84 FR 9104).

eFiling of Certificates of Compliance (16 CFR part 1110): The Commission issued an NPR and an SNPR allowing stakeholders to comment on the information collection associated with eFiling. CPSC also ran an eFiling Pilot test which was popular with industry participants and highly effective.

9. Payment or Gift to Respondents

The CPSC did not and will not provide any payment or gifts to respondents for any of the rules included in this information request.

10. Confidentiality of Information

The information submitted to CPSC would be subject to the Freedom of Information Act and its exemptions to public disclosure.

Section 104 Rules: No assurance of confidentiality exists because marking, labeling, and instructional literature are, in part, on the product and are required disclosures to consumers that are not considered confidential information.

eFiling of Certificates of Compliance (16 CFR part 1110): Certificate data provided to CPSC is secured by CPSC in databases that are not publicly searchable. CBP's system maintains security features for certificate data submitted in ACE. CPSC's Product Registry, a database for reusable certificate data, uses a range of data security techniques and best practices to protect user and business information. Some notable security features include: eFiled certificate data is encrypted at rest (encrypted storage) and in flight (Secure Sockets Layer and other secure protocols); authentication is handled by a web access management platform that requires verified ownership of a valid email address, which includes standard intruder detection and account recovery protocols; token-based authorization scheme and access controls for accounts and roles which determine level-of-access permissions for application components and for individual data requests; segregation of data by Business Account and by Product Collections. Only users authorized by the Business Account Administrators can access the collection-specific data. When a FOIA request is filed, importers, domestic manufacturers, and private labelers who are required to issue certificates are first given the opportunity to assert confidentiality before such information is released. Manufacturer information on a certificate would not be released pursuant to a FOIA request as long as the certifier makes out that the information is confidential under section 6(a) of the CPSA.

Additional Collections: Any information required to be maintained as part of the electrically operated toys rule and baby bouncer/walker jumper rule which the manufacturer or importer claims to be confidential is subject to procedures for withholding confidential information from public disclosure set forth at 16 C.F.R. Part 1015, Subpart B.

11. Sensitive Questions

Information regarding ownership, business and governmental relationships, suppliers, and third party conformity assessment body personnel may be considered sensitive. Such information could appear through the records and documentation required by the testing and component part rules. However, the rules do not require the disclosure of confidential business information to non-governmental third parties.

12. Estimates of Burden Hours and Explanation

Estimated Number of Respondents:

Testing and Certification of Children's Products: Recordkeeping requirements in parts 1107 and 1109 apply to all manufacturers, importers, and private labelers of children's products that are covered by one or more children's product safety rules promulgated and/or enforced by the CPSC.

To estimate the number of respondents, we reviewed every industry category in the NAICS and selected industry categories that included firms that could manufacture or sell children's products that are regulated by CPSC and require testing and certification. Using data from the U.S. Census Bureau,¹ we determined that there were approximately 20,100 manufacturers, about 106,700 wholesalers, and about 263,800 retailers in these NAICS categories. Accordingly, we estimate there are approximately 390,600 annual respondents. Note, however, these categories also include many non-children's products, which are not covered by any children's product safety rules. Therefore, these numbers would constitute an overestimate of the number of establishments that are subject to the PRA requirements and therefore constitute a high estimate of the number of firms that are subject to the recordkeeping requirements. Table 12.A sets forth the burden estimate for all children's product safety rules that are not rules under section 104 of the CPSIA, estimating an average annual hourly burden of 5,037,900 hours.

Section 104 Rules: Table 12.B summarizes the section 104 rules for durable infant or toddler products subject to the marking and labeling requirement that have been or are now being moved into OMB control number 3041-0159. The two new section 104 rules being moved into this information collection are shown in bold text. Table 12.B also contains the estimated number of manufacturers and models and the total respondent hours, estimating 6,338 respondents for section 104 Rules, with an estimated annual hourly burden of 97,968 hours.

eFiling Requirements: As shown in Table 12.C, the final rule to revise part 1110 estimates that 224,000 importers of children's products will annually eFile Children's Product Certificates (CPCs) with an estimated annual 209,462 hourly burden. 90 FR 1800, 1838-39 (Table 14).

Electrically Operated Toys and Other Articles Rule: CPSC staff estimates that about 40 entities will respond to this collection annually.

Baby-Bouncer/Walker-Jumper Rule: CPSC staff estimates that about six entities will

¹ All Sectors: County Business Patterns, including ZIP Code Business Patterns, by Legal Form of Organization and Employment Size Class for the U.S., States, and Selected Geographies: 2022, [Census – Table Results](#) for Table ID CB2200CBP. The list of all children's product safety rules covered by this burden analysis appears in Appendix A of the Supporting Statement posted on Regulations.gov under Docket No. CPSC-2010-0038.

respond to the testing and recordkeeping requirements of this regulation annually.

Estimated Time per Response:

Testing and Certification: We estimate that an average of 3 hours per year will be needed for each response. The PRA burden will vary greatly from respondent to respondent, depending upon factors that are out of CPSC’s control and at the discretion of the establishment. For example, respondents that regularly change their product may spend more time on testing and certification and the associated recordkeeping, while respondents that utilize the component part rule effectively, or that continuously manufacture the same product, may spend less time responding to the collection.

Section 104 Rules: Each section 104 rule contains a similar analysis for marking and labeling that estimates the time to make any necessary changes to marking and labeling requirements at 1 hour per model. Some section 104 rules also contain requirements for instructional literature, and we have included estimates for instructional literature in this analysis, where required.

eFiling Requirements: The average filing takes roughly 22 seconds (or 0.0062 hours) across filing modes.

Electrically Operated Toys and Other Articles Rule: Products subject to this regulation are also subject to the requirements of the testing rule. Therefore, the burden of any duplicative recordkeeping requirements will not be reported here to avoid double-counting the burden. CPSC staff estimates that the additional burden imposed by this regulation over that imposed by the testing rule is 1.5 hours (30 minutes per response to maintain sales and distribution records for recordkeeping, and 1 hour to make labeling changes).

Baby-Bouncer/Walker-Jumper Rule: CPSC staff estimates that respondents will spend 2 hours per response (1 hour on recordkeeping requirements, and 1 hour on labeling requirements).

Total Estimated Annual Burden:

Adding the total estimated recordkeeping burden for testing and certification (5,037,900 hours), marking and labeling for 104 Rules (97,968 hours), eFiling CPCs (209,462 hours), electrically operated toys (750 hours), and baby bouncer/walker-jumpers (24 hours) the total estimated annual burden of the collection is 5,346,104 hours.

At \$41.59 (U.S. Bureau of Labor Statistics, “Employer Costs for Employee Compensation,” March 2025, Table 4, total compensation for all sales and office workers in goods-producing private industries: https://www.bls.gov/news.release/archives/ecec_06132025.htm) hourly compensation rate, the total cost of the information collection is approximately \$222.3 million (5,346,104 hours × \$41.59 = \$222,344,465.36).

Table 12.A. Estimated Burden for Testing and Certification

Respondents	Number of responses	Frequency of response	Duration of response (in	Average hourly response burden
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			hours)	
Manufacturers	20,100	2	3	120,600
Wholesalers	106,700	3	3	960,300
Retailers	263,800	5	3	3,957,000
Total	390,600	--	--	5,037,900

Table 12.B. Estimated Burden for Marking and Labeling in Section 104 Rules

Discontinued OMB Control Number	16 CFR Part	Description	Mfrs.	Models	Total Respondent Hours
3041-0145	1215	Safety Standard for Infant Bath Seats	12	2	24
3041-0141	1216	Safety Standard for Infant Walkers	19	4	76
3041-0150	1217	Safety Standard for Toddler Beds	111	10	1,110
3041-0157	1218	Safety Standard for Bassinets and Cradles	72	4	288
3041-0147	1219	Safety Standard for Full-Size Cribs	80	13	1,040
3041-0147	1220	Safety Standard for Non-Full-Size Cribs	39	2	78
3041-0152	1221	Safety Standard for Play Yards	34	4	136
3041-0160	1222	Safety Standard for Infant Bedside Sleepers	13	2	26
3041-0155	1223	Safety Standard for Swings	6	8	48
3041-0149	1224	Safety Standard for Portable Bedrails	18	2	36
3041-0158	1225	Safety Standard for Hand-Held Infant Carriers	78	2	156
3041-0162	1226	Safety Standard for Soft Infant and Toddler Carriers	44	3	132
3041-0164	1227	Safety Standard for Carriages and Strollers	100	7	700
3041-0167	1228	Safety Standard for Sling Carriers	1,000	2	8,500*
3041-0174	1229	Safety Standard for Infant Bouncer Seats	26	4	104
3041-0166	1230	Safety Standard for Frame Child Carriers	14	3	42
3041-0173	1231	Safety Standard for High Chairs	83	3	249
3041-0172	1232	Safety Standard for Children's Folding Chairs and Stools	17	2	34
3041-0170	1233	Safety Standard for Hook-On-Chairs	7	1	7

3041-0171	1234	Safety Standard for Infant Bath Tubs	27	2	54
3041-0175	1235	Safety Standard for Baby Changing Products	141	6	846
3041-0177	1236	Safety Standard for Infant Sleep Products	1,325	6,528	68,650*
3041-0178	1237	Safety Standard for Booster Seats	52	2	104
3041-0179	1238	Safety Standard for Stationary Activity Centers	11	4	44
3041-0182	1239	Safety Standard for Gates and Enclosures	127	3.6	9,496*
3041-0185	1241	Safety Standard for Crib Mattresses	38	10	380
3041-0197	1242	Safety Standard for Nursing Pillows	844	–	1,688
3041-0202	1243	Safety Standard for Infant Support Cushions	2,000	–	4,000
Total Respondents			6,338	Total Burden	97,968

*Includes additional hours for instructional literature.

Table 12.C. Estimated Burden for other Children’s Product Requirements

Requirement	Number of Respondents	Frequency of Response	Estimated Number of Responses	Response Time (in hours)	Burden Hours
eFiling CPCs	224,000	152	34,055,116	.0062	209,462
Electrically Operated Toys and Other Articles Rule	50	10	500	1.5	750
Baby-Bouncer/Walker Jumper Rule	6	2	12	2	24

13. Estimates of Other Total Annual Cost Burden to Respondents or Recordkeepers

Many importers use import brokers who charge a filing fee to facilitate customs filings and reporting with the government. Brokers typically charge a fee per entry or per entry line that is filed, and each entry line may contain one or more product certificates. The fees that brokers charge vary with the complexity of the Message Set and with the number of Message Sets filed.

Table 13.A below presents an estimate of filing fees for CPCs. CPSC estimates that importers of children’s products will file 28,555,603 annual message sets and expect filing fees for CPCs to total \$21,987,815 annually.

Table 13.A. Estimate of Filing Fees for CPCs

Additional Cost	Number of Respondents (Importers)	Number of filings with a fee	Total Number of Responses	Cost per Response	Total Burden Cost
CPC Filing Fee	224,000	127	28,555,603	\$0.77	\$21,987,815

14. Annual Cost to the Government

Testing and Component Part Rules: CPSC collects testing and certification records when we are investigating a potential noncomplying product. The records are intended to provide documentation of testing and certification, and traceability of component parts. In an investigation, access to these records should make it easier to identify the noncomplying products and possibly reduce the cost to the government of investigating a recall. Although the CPSC cannot estimate how often it will investigate allegedly noncomplying product incidents, the examination of records required by the rule would largely be incidental to a CPSC investigation. Accordingly, we anticipate that the annual cost to the government will be minimal.

Section 104 Rules: For each section 104 rule, the estimated annual cost to the federal government is approximately \$4,873, which includes 60 staff hours to examine and evaluate the information, as needed, for compliance activities. This is based on a GS-12 level salaried employee. The average hourly wage rate for a mid-level salaried GS-12 employee in the Washington, D.C. metropolitan area (effective as of January 2025) is \$55.07 (GS-12, step 5). This represents 67.8 percent of total compensation (U.S. Bureau of Labor Statistics, “Employer Costs for Employee Compensation,” December 2025, Table 2, percentage of wages and salaries for all civilian management, professional, and related employees). Adding an additional 32.2 percent for benefits brings the average compensation for a mid-level salaried GS-12 employee to \$81.22 per hour. Assuming that approximately 60 hours will be required annually, this results in an annual cost of \$4,873.20. The combined cost to the federal government for all 28 section 104 rules is \$136,449.60.

Additional Collections: The total estimated cost to the government for the electrically operated toys rule is expected to be less than 1 staff month (160 hours). Record review will be performed during compliance inspections conducted to follow up on consumer complaints and reports of injury which indicate possible violations of the regulations. The total estimated cost to the government for the baby bouncer/walker jumper rule is expected to be two days (16 hours), of professional staff time reviewing records required by the regulations.

The annual cost to the government of the additional collections of information is estimated to be about \$14,295 ((160 hours + 16 hours) × \$81.22 = \$14,294.72) This is based on an average hourly wage rate of a GS-12, Step 5 employee.)

15. Changes in Burden

New rules have been added to Appendix A and are included in the burden estimate for this collection of information. In addition, staff changed the estimation procedure for PRA burden in this collection to include the breadth and variety of consumer products that are children’s products. To estimate the number of respondents, we reviewed every industry category in the NAICS and selected industry categories that include firms that could manufacture or sell children’s products that are regulated by CPSC and require testing and certification. Then using 2022 data from the U.S. Census Bureau’s County Business Patterns dataset, we identified the number of establishments that would report to the collection. (See footnote 1.) This new estimation procedure will improve the consistency of estimates moving forward, as long as Census is able to maintain the County Business Patterns dataset, which is currently updated on a three-year cycle.

The estimated number of responses increased from approximately 1.8 million in the previous renewal to 36 million, while the estimated burden hours have decreased from approximately 6.4 million in the previous renewal to 5.3 million. This adjustment is largely a reflection of the efficiency of eFile. Under previous processes, firms provided a paper certificate of compliance. The eFiling program enables CPSC (and CBP) to use certificate data, which has been required since 2008 but not electronically collected. Simultaneously, eFiling makes it easier for CPSC to collect required information from foreign manufacturers who may not have responded to existing testing and certification collection requirements previously. That means fewer unsafe products coming into the country and into consumers' homes. The estimated improvement in efficiency is an average decrease from 3.56 hours per response (6,400,000 hours / 1,800,000 responses), to 0.147 hours (or 8.8 minutes) per response (5,300,000 hours / 36,000,000 responses).

16. Statistical Reporting

Information collected under this requirement will not be published.

17. Exemption for Display of Expiration Date

The agency does not seek an exemption from displaying the expiration date.

18. Exemption to Certification Statement

N/A.

B. Statistical Methods

The information collection requirements do not employ statistical methods.

APPENDIX A

Children's Product Safety Rules: The following is a list of children's product safety rules that require third party testing and certification.

Citation	Description
1110	Certificates of Compliance
1203	Safety Standard for Bicycle Helmets – Children's
1215	Safety Standard for Infant Bath Seats
1216	Safety Standard for Infant Walkers
1217	Safety Standard for Toddler Beds
1218	Safety Standard for Bassinets and Cradles
1219	Safety Standard for Full-Size Cribs
1220	Safety Standard for Non-Full-Size Cribs
1221	Safety Standard for Play Yards
1222	Safety Standard for Infant Bedside Sleepers
1223	Safety Standard for Swings
1224	Safety Standard for Portable Bedrails
1225	Safety Standard for Hand-Held Infant Carriers
1226	Safety Standard for Soft Infant and Toddler Carriers
1227	Safety Standard for Carriages and Strollers
1228	Safety Standard for Sling Carriers
1229	Safety Standard for Infant Bouncer Seats
1230	Safety Standard for Frame Child Carriers
1231	Safety Standard for High Chairs
1232	Safety Standard for Children's Folding Chairs and Stools
1233	Safety Standard for Hook-On Chairs
1234	Safety Standard for Infant Bath Tubs
1235	Safety Standard for Baby Changing Products
1236	Safety Standard for Infant Sleep Products
1237	Safety Standard for Booster Seats
1238	Safety Standard for Stationary Activity Centers
1239	Safety Standard for Gates and Enclosures
1241	Safety Standard for Crib Mattresses
1242	Safety Standard for Nursing Pillows
1243	Safety Standard for Infant Support Cushions
1250	Safety Standard Mandating ASTM F963 for Toys (described in more detail in sections of ASTM F963, below)
1261	Safety Standard for Clothing Storage Units
1262	Safety Standard for Magnets
1263	Safety Standard for Button Cell or Coin Batteries and Consumer Products Containing Such Batteries
1272	Marking of Toy, Look-Alike, and Imitation Firearms (included under part 1250, section 4.30)
1303	Ban of Lead-Containing Paint and Certain Consumer Products Bearing Lead-Containing Paint - Children's Products. Applies to consumer paints and paint used on certain movable non-metal children's furniture products
1420	Requirements for All Terrain Vehicles (ATVs) - Children's
1501	Small Parts
1505	Electrically Operated Toys or Articles
1510	Rattles
1511	Pacifiers
1512	Requirements for Bicycles – Children's
1513	Safety Standard for Entrapment Hazards in Bunk Beds – Children's
1610	Standard for the Flammability of Clothing Textiles – Children's

1611	Standard for the Flammability of Vinyl Plastic Film – Children’s
1615	Standard for the Flammability of Children’s Sleepwear: Sizes 0 through 6X (FF 3-71)
1616	Standard for the Flammability of Children’s Sleepwear: Sizes 7 through 14 (FF 5-74)
1630	Standard for the Surface Flammability of Carpets and Rugs – Children’s
1631	Standard for the Surface Flammability of Small Carpets and Rugs – Children’s
1632	Standard for the Flammability of Mattresses and Mattress Pads (FF 4-72, Amended) - Children’s
1633	Standard for the Flammability (Open Flame) of Mattress Sets - Children’s
15 USC 1278a Metal	Test Method CPSC-CH-E1001-08 and/or CPSC-CH-E1001-08.1 and/or CPSC-CH-E1001-08.2 and/or CPSC-CH-E1001-08.3, or for Metal Jewelry CPSC Laboratory SOP (effective date 03/23/2009)
15 USC 1278a Non-Metal	Test Method CPSC-CH-E1002-08 and/or CPSC-CH-E1002-08.1 and/or CPSC-CH-E1001-08.2 and/or CPSC-CH-E1002-08.3, Lead Content in Children's Non-Metal Products
15 USC 2057c	Determination of Phthalates in Toys and Certain Children’s Products— Plasticizers in Polyvinyl Chloride Plastic(Test Method: CPSC-CH-C1001-09.3 and/or GB/T 22048-2008) (effective date December 31, 2011. See Federal Register notice of August 10, 2011)
1500.18(a)	Kites
1500.86(a)(5)	Clacker Balls
1500.86(a)(7) & (8)	Dive Sticks and Other Similar Articles

The following sections of ASTM F963 are mandatory safety requirements for toys codified in 16 CFR part 1250. Toys must be third party tested and certified to meet each applicable section of the standard listed below. Citations are to the 2017 version of ASTM F963, unless otherwise noted.

Citation	Description
4.10	Wires or Rods
4.11	Nails and Fasteners
4.12	Plastic Film
4.13	Folding Mechanisms and Hinges
4.14	Cords, Straps, and Elastics
4.15	Stability and Overload Requirements
4.16	Confined Spaces
4.17	Wheels, Tires, and Axles
4.18	Holes, Clearances, and Accessibility of Mechanisms
4.19	Simulated Protective Devices (except labeling and/or instructional literature requirements)
4.20.1	Pacifiers with Rubber Nipples/Nitrosamine Test
4.20.2	Toy Pacifiers
4.21	Projectile Toys
4.22	Teethers and Teething Toys
4.23.1	Rattles with nearly spherical, hemispherical, or circular flared ends
4.24	Squeeze Toys
4.25	Battery-Operated Toys (except labeling and/or instructional literature requirements)
4.26	Toys Intended to Be Attached to a Crib or Playpen (except labeling and/or instructional literature requirements)
4.27	Toy Chests (except labeling and/or instructional literature requirements) – ASTM F-963-07e1
4.27	Stuffed and Beanbag-Type Toys
4.3.5.1(2)	Surface Coating Materials – Soluble Test for Metals
4.3.5.2	Toy Substrate Materials
4.3.6.3	Cleanliness of Liquids, Pastes, Putties, Gels, and Powders
4.3.7	Stuffing Materials
4.30	Toy Gun Marking
4.32	Certain Toys with Nearly Spherical Ends
4.35	Pompoms
4.36	Hemispheric-Shaped Objects

4.37	Yo-Yo Elastic Tether Toys
4.38	Magnets (except labeling and/or instructional literature requirements)
4.39	Jaw Entrapment in Handles and Steering Wheels
4.5	Sound Producing Toys
4.6	Small Objects (except labeling and/or instructional literature requirements)
4.7	Accessible Edges (except labeling and/or instructional literature requirements)
4.8	Projections (except bath toy projections)
4.9	Accessible Points (except labeling and/or instructional literature requirements)