

# Product Compliance Requirements

## Definitions - Children's Products, Toys and Childcare Items

**Children's product definition:** Consumer product designed or intended primarily for children 12 years of age or younger. Consider the following factors:

- A statement by the manufacturer about the intended use of such product.
- Product is represented in its packaging, display, photography, promotion or advertising as appropriate for use by children 12 years of age or younger. *Example – child pictured interacting with item*
- The product is commonly recognized by consumers as being intended for use by a child 12 years of age or younger.

**Toy definition:** A children's toy is a consumer product designed or intended by the manufacturer for a child 12 years of age or younger for use by the child when the child plays, using the same considerations as above to determine whether "designed or intended for".

**Childcare item:** "Child care articles" are defined as consumer products that are designed or intended by the manufacturer for a child who is 3 years old or younger, to facilitate sleeping or feeding, or to help a child who is sucking or teething.

## Requirements

The Consumer Product Safety Improvement Act (CPSIA) requires that all children's products and toys must have a Children's Product Certificate (CPC) that is based on testing completed by an independent, third party, CPSC accredited testing laboratory. Specific requirements will vary depending on the product. The vendor is required to comply with all applicable rules, bans, regulations, and industry standards.

Minimum testing requirements may differ slightly for certain product types but generally include:

1. Analytical testing
  - a. Lead in surface coatings must be 90 ppm or less
  - b. Lead in substrate must be 100 ppm or less
  - c. Phthalates must be 1000 ppm or less in toys and child care items
  - d. Heavy metals must meet all required limits
2. Safety testing
  - a. Must be tested to comply with small parts requirements
  - b. Toys must be tested to the ASTM (American Standard Test Method) F963 Toy Safety Standard
3. Product and product packaging must have a permanent tracking label

## Actions needed

- Children's products supplied to Best Buy must be compliant to all CPSIA rules, bans, regulations, and industry standards.
- Representative samples of every item must be tested by a third party, CPSC accredited test lab and confirmed compliant to all requirements.
- Testing must be current, no older than 12 months.
- Suppliers of children's products are required to be the Importer of Record, Best Buy must not be the direct importer.
- Suppliers of children's products are required to provide information on any safety warnings related to the product for the online web content.
- Suppliers of children's products are required to provide a soft copy of the Children's Product Certificate (CPC) or a URL to access the CPC for each toy and children's product sold to Best Buy within 48 hours of a request from Best Buy.
- Suppliers of children's products are required to provide an email for their Product Compliance contact.
- **Best Buy will audit for CPSIA documentation at regular intervals.**

