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

BALLOT VOTE SHEET

Date: SEP 2 2008

TO : The Commission
Todd A. Stevenson, Secretary

THROUGH: Patricia Semple, Executive Director PS
Cheryl F. Falvey, General Counsel CAF

FROM : Lowell F. Martin, Attorney LFM

SUBJECT : Accreditation Requirements for Third Party Conformity Assessment Bodies to Test to the Lead Paint Requirements of 16 C.F.R. Part 1303

Ballot Vote Due: September 9, 2008

The attached staff memorandum recommends an approach to establishing accreditation requirements for third party conformity assessment bodies to test to the lead paint requirements of 16 C.F.R. Part 1303. The Commission is required to issue such requirements pursuant to the Consumer Product Safety Improvement Act of 2008, P.L. 110-314. By separate (official use only) memorandum, the Office of the General Counsel is providing a draft Federal Register notice that would publish the recommended requirements.

Please indicate your vote on the following options.

1. Accept the staff's recommended approach and publish the Federal Register notice as drafted.

_____ _____
Signature Date

2. Accept the staff's recommended approach and publish the Federal Register notice with changes (please specify).

_____
_____
_____

_____ _____
Signature Date

Note: This document has not been reviewed or accepted by the Commission.
Initial ____ Date 9/2/08

9/2/08

3. Do not accept the staff's recommended approach.

_____ _____

Signature Date

Attachment:

Staff briefing memorandum, *Accreditation Requirements for Third Party Conformity Assessment Bodies to Test to the Lead Paint Requirements of 16 C.F.R. Part 1303*, _____ __, 2008.

Third Party Conformity Assessment Body Accreditation Requirements for Testing Compliance with 16 C.F.R. Part 1303

As Required by the Consumer Product Safety Improvement Act of 2008

For Further Information, Contact:

Scott Heh, 301-504-7646
Special Assistant
Office of the Executive Director

Or

Robert J. Howell, 301-504-7621
Acting Assistant Executive Director
Office of Hazard Identification and Reduction

TABLE OF CONTENTS

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

Memorandum

Date: SEP 2 2008

TO : The Commission
Todd Stevenson, Secretary

THROUGH: Cheryl A. Falvey, General Counsel CAF
Patricia M. Semple, Executive Director PMS

FROM : Scott Heh SH
Special Assistant
Office of the Executive Director

Robert J. Howell
Acting Assistant Executive Director
Office of Hazard Identification and Reduction

SUBJECT : Accreditation Requirements for Third Party Conformity Assessment Bodies to Test to the Lead Paint Requirements of 16 C.F.R. Part 1303

I. Introduction

On August 14, 2008, the Consumer Product Safety Improvement Act (hereafter referred to as the "Act" or the "CPSIA") was signed into law [Public Law 110-314]. Section 102 of the Act mandates that third party testing be conducted for certain children's products. Before importing for consumption or warehousing or distributing in commerce any children's product that is subject to a children's product safety rule, every manufacturer of such children's product (and the private labeler of such children's product if such product bears a private label) shall (A) submit sufficient samples of the children's product, or samples that are identical in all material respects, to a third party conformity assessment body (hereafter referred to as third party testing laboratory) accredited under requirements to be established by the Commission to be tested for compliance with such children's product safety rule; and (B) based on the assessment by the third party testing laboratory, issue a certificate that certifies that such children's product complies with the children's product safety rule.

The third party testing requirements apply to any children's product manufactured more than 90 days after the Commission has published requirements for accreditation of third party testing laboratories to assess conformity with a children's product safety rule. The Act sets a schedule

for the Commission to publish notice of requirements for accreditation of third party testing laboratories. The full schedule for CPSC action on accreditation requirements is at Tab A. The first item for Commission action on the accreditation schedule is for the lead paint regulation. The Act requires that not later than September 13, 2008 (i.e., 30 days after enactment of the CPSIA), the Commission publish notice of requirements for the accreditation of third party testing laboratories to assess conformity with part 1303 of title 16, Code of Federal Regulations.

The Act defines a third party testing laboratory as one that is not owned, managed or controlled by the manufacturer or private labeler of a product assessed by such testing laboratory. A laboratory that is so owned, managed, or controlled may in certain specified circumstances be accredited as a third party testing laboratory. The Act specifies that a third party testing laboratory may include a government owned or controlled laboratory under certain conditions.

Special provisions are established in the Act for laboratories that are owned, managed, or controlled by a manufacturer or private labeler. Such laboratories are commonly referred to as proprietary laboratories or "first party" laboratories. The Act stipulates that the Commission may accredit a proprietary laboratory as a third party testing laboratory if the Commission by order makes certain findings that the laboratory is protected from undue influence by the manufacturer or private labeler and that provisions are in place for immediate and confidential reporting to the Commission of any attempts by the manufacturer or other interested party to hide or exert undue influence over test results. A laboratory that satisfies these requirements is defined in the statute as a "firewalled" testing laboratory.

The Act provides that accreditation of third party testing laboratories may be conducted either by the Commission or by an independent accreditation organization designated by the Commission, and requires that the Commission maintain on its web site an up-to-date list of laboratories that have been accredited to assess conformity with children's product safety rules.

II. Background on International Accreditation of Conformity Assessment Bodies (Testing Laboratories)

The term "conformity assessment" describes a variety of activities that can be used to demonstrate that specified requirements relating to a product are fulfilled. This broad term is often used to describe distinct activities such as testing, inspection, certification, as well as the accreditation of conformity assessment bodies. [1] Conformity assessment can include one or more of these activities.

In the context of this memorandum to the Commission on accreditation, "third party conformity assessment body" is synonymous with "third party testing laboratory." For proposed CPSC requirements for accreditation of testing laboratories, the CPSC staff recommends an approach that allows for certain testing laboratories to test children's products to assess conformance with 16 C.F.R. Part 1303.

There is a rapidly growing demand for conformity assessment entities that can facilitate the acceptance of products across nations' borders. This demand has resulted in the establishment of international organizations and the development of international standards related to all aspects

of conformity assessment. The International Laboratory Accreditation Cooperation (ILAC) is an organization that was formed in 1977 to promote international acceptance of test results performed by accredited laboratories. A series of standards developed by the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC) provides specifications for organizations that conduct conformity assessment activities. The ISO/IEC is a specialized system for worldwide standardization. Technical committees comprised of members from across the globe (including the United States) collaborate to develop these conformity assessment standards to facilitate acceptance of testing results between countries. These standards were developed expressly to be used by accreditation bodies that have entered into mutual recognition arrangements (MRAs) with equivalent bodies in other countries. The most relevant ISO standards for testing laboratories and the accreditation of such laboratories are: (1) ISO/IEC 17025:2005 International Standard - General Requirements for the Competence of Testing and Calibration Laboratories, and (2) ISO/IEC 17011:2004 Conformity Assessment – General Requirements for Accreditation Bodies Accrediting Conformity Assessment Bodies.

ISO/IEC 17025

The ISO/IEC 17025 standard sets out requirements for testing laboratories to demonstrate that they operate a quality system, are technically competent, and are able to generate technically valid results.

Throughout the world, many rely on laboratory accreditation as a means to independently evaluate laboratory competence. Laboratory accreditation is based upon criteria and procedures from ISO/IEC 17025 to determine the technical competence of laboratories. Technical assessors conduct a thorough evaluation of all factors of facility operations that affect the production of technical data. [2] ISO/IEC 17025 addresses factors relevant to a laboratory's ability to produce precise, accurate test and calibration data. Specifically, provisions in the standard include requirements and guidance for technical competency of staff; validity and appropriateness of the methods; traceability of measurements and calibrations to national standards; suitability, calibration, and maintenance of test equipment; and quality assurance of test, inspection, or calibration data. Laboratories are accredited to ISO 17025 for a specified technical scope. This statement of scope comprises part of the laboratory's accreditation, and can include such items as testing in accordance with mandatory standards, voluntary standards, or other types of testing regimes. A laboratory's certificate of accreditation includes the statement of scope for which it is accredited.

In addition to technical requirements, the ISO/IEC 17025 standard has management requirements on topics such as organization, management systems, document control, audits, and management reviews. Several of these management requirements address impartiality and safeguards against conflicts of interest. If the laboratory is part of an organization that performs activities other than testing, the responsibilities of key personnel in the organization that have an involvement or influence on the testing and/or calibration activities of the laboratory shall be defined in order to identify potential conflicts of interest. The laboratory must have arrangements to ensure that its management and personnel are free from any undue internal and external commercial, financial and other pressures and influences that may adversely affect the quality of their work. Further,

the laboratory must have policies and procedures to avoid involvement in any activities that would diminish confidence in its competence, impartiality, judgment or operational integrity. [3]

To ensure continued compliance, accredited laboratories are regularly re-examined, at least every two years, with either an on-site surveillance or a full reassessment, to ensure that they maintain their standards of independence and technical expertise. [2, 4]

ISO/IEC 17011

The ISO/IEC 17011 standard establishes requirements for accrediting organizations that evaluate testing laboratories for conformance with ISO/IEC 17025.

ISO/IEC 17011 was created to be used within a framework of international MRAs that implement a peer evaluation mechanism among nations' accrediting bodies. The peer evaluation process provides assurance that accrediting bodies are operating in accordance with the 17011 standard. The standard provides specifications for accrediting body procedures for conducting laboratory assessments, and also provides the procedures for the peer evaluation of operations among accrediting bodies.

Major elements of the ISO/IEC 17011 standard include requirements for the structure, management, and supervision of the accreditation body organization, including documentation of responsibilities, and demonstration of expertise. A related section of requirements addresses impartiality of the accreditor's operations. For example, the standard requires that the accreditation body shall ensure a balanced representation of interested parties with no single party predominating. All accreditation body personnel must act objectively and shall be free from any undue commercial, financial, and other pressures that could compromise impartiality.

The standard requires that an accreditation body be a registered legal entity. A governmental accreditation body is deemed to be a legal entity on the basis of its governmental status. A government is responsible for identifying the accreditation body in such a way that there is no conflict of interest with governmental conformity assessment bodies (such as government laboratories).

Other provisions in the standard include specifications for document control, internal audits and management reviews, preventative actions, analysis of findings and reports, and appeals processing. [4]

International Laboratory Accreditation Cooperation (ILAC)

ILAC officially established its charter in 1996 to create a network of MRAs among accreditation bodies to facilitate trade by promoting the acceptance of test and calibration results performed by accredited laboratories. The ILAC-MRA helped establish a global network of accredited testing and calibration laboratories that are assessed and determined to be competent by an ILAC arrangement signatory accreditation body.

There are over 60 ILAC-MRA signatory accrediting bodies located throughout the world. This includes MRA signatory organizations in Australia, Canada, China, many countries in the European Union, Japan, Mexico, the United States and several other countries. Many countries have one ILAC-MRA signatory accrediting body. Some countries have more than one accrediting organization. For example, Japan, Germany, and the United States have three or more MRA signatory accrediting bodies.[1]

The evaluation of an accreditation body to establish its qualifications to be a signatory involves a team of peers (generally senior staff of experienced accreditation bodies) who conduct evaluations in accordance with ISO/IEC 17011. The evaluations include audits at the headquarters office of the applicant body. Additionally, the evaluators witness the performance of the applicant's assessors during actual assessments/reassessments of laboratories to determine compliance with ISO/IEC 17025.

ILAC's uniform approach, based on ISO/IEC standards, allows countries to establish agreements based on mutual evaluation and acceptance of each other's laboratory accreditation systems. Each partner in such an arrangement recognizes the other partner's accredited laboratories as if they themselves had undertaken the accreditation of the other partner's laboratories. [5]

III. Different Categories of Laboratories and Proposed CPSC Acceptance

There are some accepted terms used to describe conformity assessment depending on who conducts the assessment. Third party conformity assessment testing is defined as testing that is conducted by a laboratory that is independent of the person or organization that manufactures the product. Independent commercial laboratories and government laboratories are often considered to be third party laboratories. First party conformity assessment testing is defined as testing performed by the person or organization that provides the product (e.g., a manufacturer owned laboratory that conducts testing of its own product.)

Under the system of accreditation by an ILAC-MRA member, any of these types of laboratories can be accredited to ISO 17025. For example, in addition to many commercial laboratories, CPSC staff is aware that at least one major U.S. based toy manufacturer owns a laboratory that is accredited by an ILAC-MRA organization in accordance with ISO/IEC 17025. Also, there are government affiliated laboratories that are similarly accredited. Under the ISO 17025 accreditation, not only commercial laboratories, but manufacturer (first party) laboratories and government laboratories must have arrangements to ensure that their management and personnel are free from any undue internal and external commercial, financial and other pressures and influences that may adversely affect the quality of their work.

The CPSC staff recommends that ISO 17025 accreditation by an ILAC-MRA accrediting body serve as the baseline criterion for CPSC acceptance of any laboratory, (e.g., commercial third party, government, or manufacturer owned). The staff also recommends certain additional criteria as directed by the CPSIA, depending on the type of laboratory.

[1] http://ilac.org/membersbycategory.html contains a complete list of ILAC-MRA accrediting bodies.

Laboratories Owned or Controlled by a Manufacturer or Private Labeler

The Act specifies that a laboratory owned or controlled by a manufacturer or private labeler may request Commission accreditation. The Commission may accredit a laboratory under the firewalled provision if the Commission finds *by order* that:

> A.) accreditation of the laboratory would provide equal or greater consumer safety protection than the manufacturer's or private labeler's use of an independent third party conformity assessment body; and
>
> B.) the laboratory has established procedures to ensure that –
>
> > i.) its test results are protected from undue influence by the manufacturer, private labeler or other interested party;
> >
> > ii.) the Commission is notified immediately of any attempt by the manufacturer, private labeler or other interested party to hide or exert undue influence over test results; and
> >
> > iii.) allegations of undue influence may be reported confidentially to the Commission.

In establishing standards for accreditation of a testing laboratory, the Act specifies that the Commission may consider standards and protocols for accreditation of such laboratories by independent accreditation organizations that are already in effect.

The CPSC staff recommends that the Commission consider ISO 17025 accreditation as the basis for meeting the first two criteria for firewalled laboratories [i.e., Item A - equal or greater consumer safety and Item B (i) - protected from undue influence]. The staff makes this recommendation because ISO 17025 accreditation includes an assessment to confirm the technical competence of the laboratory for a given scope and also includes an assessment of a laboratory's management and organization to ensure safeguards against undue influence.

For a proprietary laboratory to be considered under the firewalled provision, the staff further recommends that the laboratory must submit documentation that is satisfactory to the Commission to demonstrate compliance with items B (ii) and B (iii). This is discussed further in Section IV on laboratory registration with the Commission.

Government Owned Laboratories

The CPSIA provides that government owned or controlled laboratories may be considered third party laboratories if -

> - to the extent practicable, manufacturers or private labelers located in any nation are permitted to choose testing laboratories that are not owned or controlled by the government of that nation;

- the entity's testing results are not subject to undue influence by any other person, including another governmental entity;

- the entity is not accorded more favorable treatment than other testing laboratories in the same nation who have been accredited;

- the entity's testing results are accorded no greater weight by other governmental authorities than those of other accredited laboratories; and

- the entity does not exercise undue influence over other governmental authorities on matters affecting its operations or on decisions by other governmental authorities controlling distribution of products based on outcomes of the entity's conformity assessments.

The staff recommends that government laboratories be accepted as third party testing laboratories if they are accredited in accordance with ISO 17025 and they meet the conditions outlined above. To obtain this assurance, CPSC staff will engage the government entities relevant to the accreditation request.

IV. Third Party Laboratory Registration with the CPSC and Required Documents

The staff recommends that the Commission implement a process by which a third party laboratory must submit documentation to the CPSC that demonstrates adherence to the proposed accreditation requirements. The baseline documentation must include the ISO 17025 accreditation certificate, including a statement of scope that clearly identifies 16 C.F.R. Part 1303.

If the Commission concurs, the staff will set up a CPSC web site online registration process for laboratories to submit the required documentation. Tab B shows a draft format for the on-line registration form. The laboratory must identify if it is a third party, government, or firewalled laboratory. If the laboratory is owned or controlled in part or in whole by a government, it must identify the government entity on the registration.

An important piece of the staff's recommended registration process is a section that requires a listing of manufacturers of any products subject to the lead paint standard who hold a ten percent or greater interest in the facility.[2] The staff recommends this approach to identify which laboratories must comply with the statutory requirements for accreditation of "first party" or "firewalled" laboratories. Those laboratories must submit a copy of the firm's established materials used for training its employees on the process and means by which allegations of any attempt by the manufacturer, private labeler, or other interested party to hide or exert undue influence over test results can be immediately and confidentially reported to the Commission,

[2] This ten percent or greater criterion is also used by the Federal Energy Regulatory Commission [Standards of Conduct for Transmission Providers, Order No. 2004, 105 FERC P61,248 at 62,299 (2003)] and the Federal Communications Commission [47 C.F.R. section 1.2112] as the criterion for potential control by an affiliated business entity.

thus satisfying the statutory requirements for accreditation if the Commission finds the materials to be satisfactory.

After a laboratory has submitted the required documentation associated with ISO/IEC 17025 accreditation and has been accepted as a third party laboratory, the staff recommends that the laboratory contact information and testing scope be posted on the CPSC web site in a list of laboratories that are accredited to test compliance with 16 C.F.R. Part 1303.

For laboratories seeking acceptance under the firewalled provision, the staff recommends an examination by staff of all relevant materials required by the registration. The results of the staff review would be submitted to the Commission for its official consideration of whether to accredit the laboratory as a firewalled laboratory.

V. Proposed Limited Acceptance of Children's Product Certifications Based on Testing Prior to the Effective Date

The staff recommended accreditation approach utilizes and builds upon existing systems of conformity assessment based on ISO/IEC standards and internationally recognized accrediting bodies. In the field of children's products, some manufacturers, importers, and/or retailers have put in place their own processes for third party testing to demonstrate conformity with certain mandatory and voluntary safety standards. These systems may already dictate testing by third party laboratories that are accredited by an ILAC-MRA signatory body in accordance with ISO 17025. Therefore, there are likely many products in the marketplace that have already undergone testing earlier than the mandatory effective date in a way that would support the children's product certification of compliance with 16 C.F.R. Part 1303 required by the CPSIA.

For these children's products, the staff recommends that the Commission allow certifications to be based on prior testing under certain conditions. Specifically, the staff proposes that the Commission accept lead in paint certifications if the product[3] was tested on or after August 14, 2008 (the date of CPSIA enactment) by a laboratory that is CPSC-accepted as accredited no later than November 26, 2008.[4] This policy would allow for certification of products on the basis of testing performed relatively recently by an accredited third party laboratory, thereby providing a substantial degree of assurance of compliance with 16 C.F.R. Part 1303. Under this approach, firms who were already voluntarily getting products tested by competent laboratories will not have to have those same products retested during this start-up period. This approach also may help prevent testing backlogs at accredited laboratories, making it less likely that the Commission will have to postpone the effective date for certification.[5] Manufacturers and private labelers that did not already utilize third party testing, or that based their certifications on

[3] The CPSIA requires that certification be based on testing of sufficient samples of the product, or samples that are identical in all material respects to the product.

[4] The staff recommends November 26, 2008 as a practical intermediate date in the period between Commission notice of laboratory accreditation requirements and the date when product certification to 16 C.F.R. Part 1303 is required (accreditation notice date plus 90 days).

[5] In accordance with the CPSIA, if the Commission determines that an insufficient number of third party laboratories have been accredited to permit certification for a children's product safety rule under the Act's accreditation schedule, the Commission may extend the deadline for certification to such rule by not more than 60 days.

test dates prior to August 14, 2008, would need to conduct third party testing by a CPSC-accepted laboratory to be able to certify products manufactured on or after the effective date.

The staff recommends that government laboratories be treated similarly as other third party laboratories with respect to certifications based on testing prior to the effective date. Nonetheless, manufacturers and private labelers will need to consider carefully the fact that government laboratories also will need to meet the conditions for governmental entities as required by the Act. If the CPSC accepts accreditation of a government laboratory by November 26, 2008, testing by that laboratory conducted on or after August 14, 2008 can be used to support third party certification for lead in paint.

The staff recommends that prior testing by first party laboratories (e.g., manufacturer owned laboratories), even if ISO 17025 accredited, would not be accepted since the firewall provisions established by the CPSIA would not have been in place at the time of the test.

In summary, the staff recommends that the Commission will accept a certificate of compliance with the lead paint ban for a children's product based on testing performed by an accredited laboratory on or after August 14, 2008 (the date of enactment of CPSIA) but prior to the Commission's acceptance of the laboratory's accreditation if:

- the third party laboratory was ISO/IEC 17025 accredited by an ILAC-MRA member at the time of the test;
- the accreditation scope in effect for the laboratory at that time expressly included testing to 16 C.F.R. Part 1303;
- the laboratory's accreditation application is accepted by the Commission under the procedures proposed in this memorandum by November 26, 2008; and
- the laboratory's accreditation and inclusion of part 1303 in its scope remains in effect through the effective date for mandatory third party certification to the lead paint ban.

VI. Environmental Considerations

Generally, CPSC mandatory requirements are considered to "have little or no potential for affecting the human environment," and environmental assessments are not usually prepared for such actions (see 16 C.F.R 1021.5(c)(1)). Nothing in these recommended accreditation requirements alters that expectation. Therefore, the staff does not expect such requirements to have any negative environmental impact.

VII. Recommended Effective Date

The staff recommends that the requirements for accreditation for third party laboratories to test to the lead paint ban of 16 C.F.R. Part 1303 become effective upon publication of notice thereof in the Federal Register. Publication in the Federal Register is typically the means by which the public is formally advised of the coming into force of new mandatory requirements.

An FR publication of third party laboratory accreditation requirements would also establish an effective date of 90 days after FR publication for children's products to be certified to comply with the lead paint ban at 16 C.F.R. Part 1303[6].

VIII. Staff Recommendation for Accreditation Requirements for Third Party Laboratories to Test to the Lead Paint Requirements of 16 C.F.R. Part 1303

The staff recommends that the Commission approve posting its recommended accreditation requirements on the CPSC web site and publishing them in a Federal Register (FR) notice as drafted by the Office of the General Counsel (provided separately under restricted cover). The FR notice would establish the requirements for laboratories to become accredited to test to the lead paint requirements of 16 C.F.R Part 1303. In addition, the FR notice would solicit comments from interested parties on the established approach for laboratory accreditation associated with the lead paint requirements and on the overall approach for accreditation.

[6] The CPSIA confirms existing law that compliance of any children's product with third party testing and certification does not exempt such children's product from complying with the underlying safety rule or standard to which the product is certified [15 U.S.C. 2063(h)]. Therefore, the Commission may take action against firms that distribute products that are not in compliance with 16 C.F.R. Part 1303, even if those products are certified based on third party testing.

References

[1] ISO/IEC 17000:2004 Conformity Assessment – Vocabulary and General Principles.

[2] White paper: Should Laboratories be Accredited to ISO/IEC 17025 or Certified to ISO 9001? www.aclasscorp.com

[3] International Standard ISO/IEC 17025:2005 - General Requirements for the Competence of Testing and Calibration Laboratories

[4] ISO/IEC 17011:2004 Conformity Assessment – General Requirements for Accreditation Bodies Accrediting Conformity Assessment Bodies

[5] www.ilac.org

TAB A

Time Line for Establishing Laboratory Accreditation Requirements

- Lead paint ban at 16 C.F.R. part 1303 -- not later than 30 days after enactment [September 13, 2008]

- Full sized cribs at 16 C.F.R. part 1508, non full-sized cribs at 16 C.F.R. part 1509, and pacifiers at 16 C.F.R. part 1511 -- not later than 60 days after enactment [October 13, 2008]

- Small parts at 16 C.F.R. part 1501 -- not later than 90 days after enactment [November 12, 2008]

- Children's metal jewelry under the standards for lead at section 101(a)(2) of CPSIA -- not later than 120 days after enactment [December 12, 2008]

- Baby bouncers, walkers and jumpers at 16 C.F.R. §§ 1500.18(a)(6) and 1500.86(a) -- not later than 210 days after enactment [March 12, 2009]

- Children's products subject to the 300 ppm lead content limit of Section 101 of the CPSIA other than metal jewelry -- not later than May 16, 2009

- All other current CPSC children's product safety rules -- not later than 10 months after enactment of CPSIA [June 14, 2009]

TAB B

DRAFT FORM FOR LABORATORY REGISTRATION WITH CPSC

CPSC Form #xxxx

U.S. Consumer Product Safety Commission
4330 East West Highway, Bethesda, MD 20814

Consumer Product Conformity Assessment Body Recognition

Registration Form
for Lead Paint, 16 C.F.R. Part 1303

This registration form and all related materials (certificate, scope documents, and training materials, if required) must be submitted electronically and in the English language.

1. Legal name of the laboratory

_____

2. Full address of the laboratory

Address (Line 1) _____

Address (Line2) _____

City _____ State/Province _____

Country _____ Post Code _____

3. Registering as a (check one):

- ☐ Firewalled Conformity Assessment Body
- ☐ Third Party Conformity Assessment Body
- ☐ Government Conformity Assessment Body

4. Registration status (check one):

- ☐ New Registration
- ☐ Increase in scope from prior registration
- ☐ Renewal
- ☐ Reinstatement

5. Laboratory name as you wish it to be listed on the CPSC web site, if different than legal name

_____

6. Laboratory's authorized representative

Family name(s): _____ First (Given) name _____

Title _____ E-mail _____

Telephone # _____ Fax # _____

7. Laboratory Accreditation Information

Date of accreditation to ISO/IEC 17025:2005 _____

Name of ILAC-MRA member providing accreditation _____

Certificate number _____

Expiration date _____

8. Laboratory web site (optional) _____

9. Ownership

Name(s) of all manufacturers and/or private labelers of children's products subject to 16 C.F.R. Part 1303 holding ten percent or greater interest in this conformity assessment body. If this entity is owned or controlled in part or in whole by a government, name the government entity below.

Percent Owned

a. _____ _____

b. _____ _____

c. _____ _____

d. _____ _____

e. _____ _____

f. _____ _____

g. _____ _____

h. _____ _____

i. _____ _____

j. _____ _____

All registrants must provide a copy of the laboratory accreditation certificate and relevant scope documents with this registration form.

Firewalled conformity assessment bodies must also submit copies of the training materials noted in section 10.

10. Firewalled conformity assessment body training materials

If any manufacturer or private labeler of children's products subject to 16 C.F.R. Part 1303 holding ten percent or greater interest in this conformity assessment body is using this entity for the required testing of their products, the conformity assessment body must submit a copy of the firm's established materials used for training its employees on the process and means by which allegations of any attempt by the manufacturer, private labeler or other interested party to hide or exert undue influence over test results can be immediately and confidentially reported to the Commission.

11. Applicant Information

Family name(s): _____ First (Given) name: _____

Title: _____ E-mail _____

Current Date _____

KNOWING AND WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR IN ANY OTHER SUBMITTED MATERIALS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT FOR UP TO FIVE YEARS (U.S. Code, Title 18, Section 1001) AND/OR WITHDRAWAL OF CPSC RECOGNITION OF ACCREDITATION.

Submit by E-mail

CPSC
Revision 4b