

Preparing Authority: Bibi Abdullah	 G117 - Guidance on Scopes of Accreditation for Testing Laboratories Registered with the US Consumer Product Safety Commission	Publication Date: 07/06/23
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The Consumer Product Safety Improvement Act of 2008 (CPSIA) requires that children’s products and toys be tested by laboratories accepted by the US Consumer Product Safety Commission (CPSC). The CPSC requires that testing laboratories are accredited to ISO/IEC 17025 by an Accreditation Body that is a full member signatory to the ILAC MRA. Additionally, the CPSC mandates that the Scope of Accreditation issued to the laboratory must include an explicit reference to each children's product safety rule and/or test method for which the testing laboratory is registering with the CPSC.

Laboratories that wish to be considered for [CPSC acceptance](#) and listed on the CPSC website must submit an application with the CPSC at <http://www.cpsc.gov/cgibin/labregentry>.

Some CPSC mandated product safety rules are either safety requirements or Codes of Federal Regulation with no embedded test methods. Therefore, A2LA requires that in addition to the CPSC requirements, the laboratory shall also be accredited to an applicable published test method in order for the CPSC-required rules and/or regulations to remain on the laboratory’s Scope of Accreditation.

Below are tables of the [CPSC mandated product safety rules](#), the CPSC required method, and if applicable, the A2LA required method. For example, in order for a testing laboratory to register with the CPSC for Battery-Operated Toys, the laboratory would need to be accredited for ASTM F963-17 (Section 4.25). However, said “method” is actually a safety requirement with no embedded test methods. Therefore, A2LA would also require the laboratory to be accredited for ASTM F963-17 (Sections 8.17- 8.18), which do contain test methods, or another applicable published test method.

Table 1 – Mechanical Toy Safety Tests

<u>CPSC Product Safety Rule</u>	<u>CPSC Required Methodⁱ</u>	<u>A2LA Required Methodⁱⁱ</u>
Battery-Operated Toys	ASTM F963-17 ⁱⁱⁱ (Section 4.25)	ASTM F963-17 (Sections 8.17- 8.18)
Clacker Balls	16 CFR 1500.86(a)(5)	N/A
Confined Spaces	ASTM F963-17 (Section 4.16)	N/A
Cords, Straps, and Elastics	ASTM F963-17 (Section 4.14)	
Dive Sticks	16 CFR 1500.86(a)(7)(8)	N/A
Electrically Operated Toys	16 CFR 1505	N/A
Expanding Materials	ASTM F963-17 (Section 4.40)	
Folding Mechanisms & Hinges	ASTM F963-17 (Section 4.13)	
Hemispherical-Shaped Objects	ASTM F963-17 (Section 4.36)	Hemispherical-Shaped Objects
Holes, Clearance, & Accessibility of Mechanisms	ASTM F963-17 (Section 4.18)	
Jaw Entrapment in Handles and Steering Wheels	ASTM F963-17 (Section 4.39)	
Nails and Fasteners	ASTM F963-17 (Section 4.11)	N/A
Pacifiers, Toy	ASTM F963-17 (Section 4.20.2)	N/A
Plastic Film	ASTM F963-17 (Section 4.12)	ASTM F963-17 (Section 8.21)
Pom Poms	ASTM F963-17 (Section 4.35)	ASTM F963-17 (Section 8.16)
Projectile Toys	ASTM F963-17 (Section 4.21)	ASTM F963-17 (Section 8.14)
Projections ^{iv}	ASTM F963-17 (Section 4.8)	N/A
Rattles	16 CFR 1510; ASTM F963-17 (Section 4.23)	N/A
Sharp (Accessible) Edges	ASTM F963-17 (Section 4.7)	16 CFR 1500.49
Sharp (Accessible) Points	ASTM F963-17 (Section 4.9)	16 CFR 1500.48
Simulated Protective Devices	ASTM F963-17 (Section 4.19)	N/A
Small Objects	16 CFR 1501; ASTM F963-17 (Section 4.6)	N/A
Sound-Producing Toys	ASTM F963-17 (Section 4.5)	ASTM F963-17 (Section 8.19)
Squeeze Toys	ASTM F963-17 (Section 4.24)	N/A
Stability and Overload Requirements	ASTM F963-17 (Section 4.15)	ASTM F963-17 (Section 8.15) ^v , ASTM F963-17 (Section 8.20) ^v , ASTM F963-17 (Section 8.26) ^v
Stuffed and Bean Bag-Type Toys	ASTM F963-17 (Section 4.27)	ASTM F963-17 (Section 8.9.1)
Teethers and Teething Toys	ASTM F963-17 (Section 4.22)	N/A
Toy Chests	ASTM F963-17 (Section 4.41)	
Toy Gun Marking	ASTM F963-17 (Section 4.30)	N/A
Toys Intended to be Attached to a Crib or Playpen	ASTM F963-17 (Section 4.26)	N/A
Toys with Nearly Spherical Ends	ASTM F963-17 (Section 4.32)	N/A
Wheels, Tires and Axles	ASTM F963-17 (Sections 4.17)	ASTM F963-17 (Section 8.11)
Wires or Rods	ASTM F963-17 (Section 4.10)	ASTM F963-17 (Section 8.12)
Yo-Yo Elastic Tether Toys	ASTM F963-17 (Section 4.37)	ASTM F963-17 (Section 8.23)

Table 2 – Mechanical Juvenile/Other Products Tests

<u>CPSC Product Safety Rule</u>	<u>CPSC Required Method</u>	<u>A2LA Required Method</u>
All-Terrain Vehicles (ATVs)	16 CFR 1420	ANSI/SVIA 1
Bassinets/Cradles	16 CFR 1218	ASTM F2194

<u>CPSC Product Safety Rule</u>	<u>CPSC Required Method</u>	<u>A2LA Required Method</u>
Bedside Sleepers	16 CFR 1222	ASTM F2906
Bicycle Helmets	16 CFR 1203	N/A
Bicycles	16 CFR 1512	N/A
Bunk Beds	16 CFR 1513	N/A
Clothing Storage Units	16 CFR 1261	ASTM F2057
Cribs, Full-Size	16 CFR 1219	ASTM F1169
Cribs, Non-Full-Size	16 CFR 1220	ASTM F406
Crib Mattresses	16 CFR 1241	N/A
Frame Child Carriers	16 CFR 1230	ASTM F2549
Gates and Enclosures	16 CFR 1239	ASTM F1004
Hand-Held Infant Carriers	16 CFR 1225	ASTM F2050
Infant Bath Seats	16 CFR 1215	ASTM F1967
Infant Swings	16 CFR 1223	ASTM F2088
Infant Walkers	16 CFR 1216	ASTM F977
Magnet Sets	16 CFR 1240	16 CFR 1501 ^{vi} ; ASTM F963-17 (Section 8.24) ^{vi}
Pacifiers, Infant	16 CFR 1511	N/A
Play Yards	16 CFR 1221	ASTM F406 (excluding Sections 5.17, 5.19, 5.20, 6, 8.1-8.10.5, 10.1.1.1)
Portable Bed Rails	16 CFR 1224	ASTM F2085
Portable Gasoline Containers	16 CFR 1460	ASTM F2517
High Chairs	16 CFR 1231	ASTM F404
Folding Chairs and Stools	16 CFR 1232	ASTM F2613
Portable Hook-On Chairs	16 CFR 1233	ASTM F1235
Infant Bath Tubs	16 CFR 1234	ASTM F2670
Changing Products	16 CFR 1235	ASTM F2388
Booster Seats	16 CFR 1237	ASTM F2640
Soft Infant/Toddler Carriers	16 CFR 1226	ASTM F2236
Strollers/Carriages	16 CFR 1227	ASTM F833
Sling Carriers	16 CFR 1228	ASTM F2907
Infant Bouncer Seats	16 CFR 1229	ASTM F2167
Toddler Beds	16 CFR 1217	ASTM F1821
Toy Chests	ASTM F963-07 ^{ε1} (Section 4.27)	N/A

Table 3 – Flammability Tests

<u>CPSC Product Safety Rule</u>	<u>CPSC Required Method</u>	<u>A2LA Required Method</u>
Children’s Sleepwear, Sizes 0 - 6X	16 CFR 1615	N/A
Children’s Sleepwear, Sizes 7 - 14	16 CFR 1616	N/A
Clothing Textiles	16 CFR 1610	N/A
Mattresses and Mattress Pads	16 CFR 1632	N/A
Mattress Sets (Open Flame)	16 CFR 1633	N/A
Surface of Carpets and Rugs	16 CFR 1630	N/A
Surface of Small Carpets and Rugs	16 CFR 1631	N/A
Vinyl Plastic Film	16 CFR 1611	N/A

Table 4 – Chemical Toy Safety Tests

<u>CPSC Product Safety Rule</u>	<u>CPSC Required Method</u>	<u>A2LA Required Method</u>
Art Materials	ASTM F963-17 (Section 4.29)	15 USC 1278a
Heavy Elements (Sb, As, Ba, Cd, Cr, Pb, Hg, Se) in Paint and Other Surface Coatings	ASTM F963-17 (Section 4.3.5.1(2))	ASTM F963-17 (Section 8.3)
Heavy Elements in Toy Substrate Materials	ASTM F963-17 (Section 4.3.5.2)	ASTM F963-17 (Section 8.3)
Lead (Pb) Content in Children’s Metal Products	CPSC-CH-E1001-08 ^{vii} , CPSC-CH-E1001-08.1 ^{vii} , CPSC-CH-E1001-08.2 ^{viii} , CPSC-CH-E1001-08.3 ^{viii}	N/A
Lead (Pb) Content in Children’s Non-Metal Products	CPSC-CH-E1002-08 ^{viii} , CPSC-CH-E1002-08.1 ^{viii} , CPSC-CH-E1002-08.2 ^{viii} , CPSC-CH-E1002-08.3 ^{viii}	N/A
Lead (Pb) in Paint and Other Surface Coatings	16 CFR 1303 ^{ix} ; CPSC-CH-E1003-09, CPSC-CH-E1003-09.1; ASTM F2853-10 ^x	N/A
Liquids, Pastes, Putties, Gels and Powders ^{xi}	ASTM F963-17 (Section 4.3.6.3)	ASTM F963-17 (Section 8.4)
Pacifiers, Nitrosamine Test	ASTM F963-17 (Section 4.20.1)	ASTM F1313
Phthalate Determination	CPSC-CH-C1001-09.3; GB/T 22048-2008	N/A
Stuffing Materials	ASTM F963-17 (Section 4.3.7)	AOAC 945.75, AOAC 970.66

ⁱ If more than one method is listed in this column, unless otherwise indicated, the laboratory is not required to be accredited for all methods listed.

ⁱⁱ The test methods listed in this column are given as examples since they are specifically identified in the respective CPSC required methods. However, any applicable published test method will suffice. For example, 16 CFR 1500.49 is listed as the required additional method for Sharp (Accessible) Edges. Another applicable additional method is the European standard

EN 71-1 (Section 8.11). Therefore, for use as an additional method, it would be acceptable for a laboratory to be accredited for EN-71 (Section 8.11) rather than 16 CFR 1500.49.

iii ASTM F963 became effective as a mandatory consumer product safety standard on June 10, 2013. CPSC requires the scope of accreditation to specify the individual sections of the currently accepted version of ASTM F963 applicable to the product and not simply cite 16 CFR 1250.

iv Except bath toy projections.

v In addition to the CPSC Stability and Overload Requirements of ASTM F963-17 (Section 4.15), A2LA requires that the testing laboratory be accredited for ASTM F963-17 (Section 8.15) and/or Section 8.20 and/or Section 8.26.

vi 16 CFR 1240 specifically states that “each magnet in a magnet set, and any individual magnet, that fits completely within the [small parts] cylinder described in 16 CFR 1501 must have a flux index of 50 kG²mm² or less when tested in accordance with the method described in section 8.24 of ASTM F963-17.” Therefore, in addition to 16 CFR 1240, A2LA requires that the testing laboratory be accredited for both 16 CFR 1501 and ASTM F963-17 (Section 8.24).

vii Using Inductively Coupled Plasma Optical Emission Spectrometry (ICP-OES), Inductively Coupled Plasma Mass Spectrometry (ICP-MS), Flame Atomic Absorption (FLAA) or Graphite Furnace Atomic Absorption (GFAA).

viii Using ICP-OES, ICP-MS, FLAA, GFAA or X-ray Fluorescence (XRF).

ix Per CPSC Docket No. CPSC-2008-033 (Dated March 30, 2011), the CPSC requires that in addition to 16 CFR 1303, a laboratory’s Scope of Accreditation must contain CPSC-CH-E1003-09 or CPSC-CH-E1003-09.1 and/or ASTM F2853-10.

x Section 7.1 of ASTM F2853-10 specifically states that an Energy Dispersive X-ray Fluorescence (EDXRF) Spectrometer is required for this test method. Additionally, the corresponding footnote to Section 7.1 of ASTM F2853-10 states that “*the sole source of supply of the apparatus known to the committee at this time is X-Ray Optical Systems, Inc. (XOS).*” However, a Spectrometer not manufactured by XOS but shown capable of meeting the method precision and incorporating the features highlighted in Sections 7.1.1 through 7.1.5 of ASTM F2853-10 is deemed acceptable.

xi Except for cosmetics and tests on formulations used to prevent microbial degradation.

DOCUMENT REVISION HISTORY

Date	Description
07/06/2023	<ul style="list-style-type: none">➤ Updated ASTM F963-11 to ASTM F963-17 throughout the guidance document➤ Added Folding Mechanisms & Hinges, Cords, Straps, and Elastics, Holes, Clearance, & Accessibility of Mechanisms, Hemispherical-Shaped Objects, Jaw Entrapment in Handles and Steering Wheels, Expanding Materials, and Toy Chests under Table 1➤ Added Clothing Storage Units, Crib Mattresses, and Gates and Enclosures under Table 2➤ Added Art Materials under Table 4➤ Updated footnote iii to reflect what is currently noted on the CPSC website.