



PRODUCT COMPLIANCE REPORT

Children's Clothing

Overview

Product Name	Organic Cotton Baby Romper
Company Name	None
Country/Market	USA
Date	2021-10-13

Product Information

Selected Category: Children's Clothing

Do you intend to sell this product in California?: Yes

Is this product Children's Upper Outdoor Wear?: No

Does this product contain leather parts?: No

Does the Flammable Fabrics Act apply to your product?: Yes

Is this product Children's Sleepwear?: Yes

Is product packaging included?: Yes

Is this product packed in a plastic bag?: Yes

Is this product/packaging made of composite wood?: No

Is the packaging material made of wood or include wooden pallets?: No

Do you intend to claim that the product is Made in USA?: No

Icons

 Documentation/Certification

 Product & Packaging Labeling

 Product Lab Testing

 **Learn More (Sources)**

Important Information

Disclaimer: The content in the PDF report is provided for general information purposes only. The content includes summaries written by our team members based on publicly available information about product safety standards, labeling, documentation, testing, processes, and other product compliance-related topics. However, we don't guarantee that we cover every single relevant regulation/standard/requirement applicable to a certain product (We only cover the regulations/directives/rules listed in [this document](#)), or that the information is free from errors, or covering every single option, scenario, or exemption. We do make mistakes from time to time. We never provide legal advice of any sort.

Input Options: The report is generated based on your inputs. This is how the information in the report is structured:

a. Country/Market: Generates compliance requirements are broadly relevant to products belonging to your selected product category. Note that this is a general summary and there are exceptions.

b. Product Category: Generates compliance requirements are broadly relevant to products belonging to your selected product category. Note that this is a general summary and there are exceptions.

c. Specifications: Specify materials, age group, and other options that may impact which compliance requirements apply to a certain product. These input options differ depending on the selected product category. Keep in mind that we never guarantee that we cover every single input option that may be relevant to all products that fall within the scope of each product category.

Changes/Updates: Product standards and substance restrictions are subject to frequent updates and changes. In addition, new regulations, standards, and/or requirements may also become effective at any time. We review a predetermined list of official EU and US sources to stay up to date with updated product certification, labeling, testing, and other compliance requirements. We send the reports monthly to our customers by email - and clarify which (if any) of the update requires an update to the Compliance Report Tool database.

1. We do not guarantee that all updates are made in real-time. There can be a delay from the implementation of new requirements until we have updated the tool.

2. We do not guarantee that we 'catch' every single new or updated compliance requirement.

3. We recommend that you consult a lab testing company to get the latest information about mandatory standards/regulations in your market, country, or state. Lab testing companies generally stay up to date on new and updated standards and regulations.

Learn more:

- [Monthly Compliance Update \(PDF\) Sample](#)
- [Monthly Review Methodology \(PDF\)](#)

National/State-Level Standards/Regulations: The report doesn't cover all European national and US state standards, regulations, and requirements. We recommend that you consult a testing company or other professional to confirm all relevant (and current) national/state-level standards and regulations.

Sources: We link to official website sources in this report under **Learn more**, where you must go to find additional information about each topic.

Technical problems: The tool could malfunction as a result of programming bugs, hacking or other software interfering with the Compliance Report Tool. This can in turn result in the report missing information or containing for other reasons incorrect information. We test the tool* on a monthly basis, but cannot guarantee that this will never happen.

*Testing on Chrome and Safari browsers on desktop (Macbook Air M1 Chip 2020) only. We do not test on other website browsers or mobile devices.

Terms of Services

By accessing or using the Services, or using our website, affiliate websites, and the like, you Agree to the following terms and conditions:

1. You agree, as manufacturer, user, or importer that you are legally responsible for every consumer product, and compliance of applicable governing laws, for every consumer product made, sold, imported, or manufactured;
2. You agree to indemnify ComplianceGate against any legal obligations;
3. You acknowledge that ComplianceGate provides a general information service only to assist with importing and selling of consumer goods;
4. You acknowledge and agree that if You provide facts and/or circumstances and/or information that is inaccurate, that the information and/or Services provided by ComplianceGate may not be complete and/or accurate;
5. You acknowledge that information and Services provided by ComplianceGate are not legal advice and are not advice provided by licensed attorneys;
6. You acknowledge and agree not to rely on the Services and information provided by ComplianceGate;
7. You acknowledge that the Services and information provided by ComplianceGate are not guaranteed, do not come with any covenants and/or warranties;
8. You acknowledge that any and all information and/or Services provided by ComplianceGate should not be a substitute for guidance from a licensed, qualified attorney;
9. You acknowledge that information and/or Services provided by ComplianceGate are not binding to any legal effect; and
10. You acknowledge that by using the tool we collect your email address and other information that might be necessary (read our [Privacy Policy](#) for more details).

Applicable Law and Forum

The Agreement shall be governed by and construed in accordance with the internal laws of the Hong Kong Special Administrative Region of the People's Republic of China. Any conflict or dispute between the Parties that may arise in connection with this Agreement shall be exclusively submitted to the competent civil court in Hong Kong.



Product Category

These compliance requirements are broadly relevant to products belonging to your selected product category. Note that this is a general summary and there are exceptions.

CPSIA

Product Category: **Children's Clothing**

CPSIA regulates all products sold to children aged 12 years or younger. It covers toys and other children's products. Such products include those that are generally considered to be children's products.

Important note

Some children's product standards and regulations fall outside the scope of CPSIA. Carefully review 3. Regulations, Mandatory Standards and Bans to assess if CPSA, FHSA, or other requirements apply.

Learn More

1. The Consumer Product Safety Improvement Act (CPSIA)([Link](#))
2. What is a Children's Product? ([Link](#))
3. Regulations, Mandatory Standards and Bans ([Link](#))

ASTM Standards

CPSIA requires that the product is fully compliant with applicable ASTM standards and CPSC rules. Some standards, rules, and substance restrictions only apply to certain types of children's products, while others apply more broadly to all children's products. The first step of the process is to assess relevant and applicable ASTM and CPSC rules for your product.

Examples

ASTM F 963-17 Requirements Standard Consumer Safety Specification for Toy Safety

16 CFR Part 1203, Safety Standard for Bicycle Helmets

16 CFR Part 1228, Safety Standard for Sling Carriers

Learn More

1. Rules Requiring Third-Party Testing and a Children's Product Certificate ([Link](#))
2. ASTM F 963-17 Requirements Standard Consumer Safety Specification for Toy Safety ([Link](#))

Lab Testing

1. Third-party lab testing is mandatory when importing and selling children's products in the United States. Note that testing companies can also help you confirm relevant standards and rules applicable to your product.
2. Only test reports issued by a CPSC accepted lab are valid. You can search CPSC accepted labs using the link below.

Learn More

1. Testing & Certification ([Link](#))
2. Periodic Testing & Small Entity Compliance Guide ([Link](#))
3. List of CPSC-Accepted Testing Laboratories ([Link](#))

Children's Product Certificate (CPC)

Children's product importers and manufacturers must also issue a CPC, which is a self-issued document with information about the product, your company, supplier location, applicable standards, and the CPSC approved testing company.

Learn More

Children's Product Certificate (CPC) ([Link](#))

CPSIA Tracking Label

The product and the packaging must carry a CPSIA tracking label. This information is generally included:

- Importer company name
- Contact information: US address and phone number
- Model number/Product SKU
- Production location
- Production date
- Batch number

Learn More

1. Tracking Label Requirement for Children's Products ([Link](#))
2. Product and Outer Package Labeling Requirements for Durable Infant or Toddler Products ([Link](#))

Small Parts Requirements

Small parts are banned for children's products considered as suitable for certain age groups (e.g. children under 3 years). A 'small part' can be any of the following:

1. An individual component
2. A part that breaks off during testing
3. A fully assembled product

Small Parts Testing

Additional testing procedures apply to products that fall within the scope. Always consult a CPSC accepted testing lab to assess whether small parts testing is applicable to the product.

Age Group

Manufacturers and importers cannot arbitrarily decide whether their product is classified as intended for a certain age group. See the source under learn more for detailed information about age group classification.

Warning Labeling

Small parts choking hazard warning labeling is required for children's products for certain age groups (e.g. 3 to 6 years).

Learn More

Small Parts for Toys and Children's Products Business Guidance ([Link](#))

Other Warning Labels

Additional warnings may be required for certain types of products. Here are some examples:

Aquatic toys

"WARNING: This is not a lifesaving device. Do not leave child unattended while device is in use"

Crib and playpen toys

"WARNING: Possible entanglement or strangulation. Remove toy when baby begins to push up on hands and knees"

See ASTM F963 or other relevant standards for more details.

Learn More

What is an ASTM standard? ([Link](#))

CPSC Small Business Ombudsman

The CPSC Small Business Ombudsman can help you confirm current CPSIA and other CPSC product compliance requirements.

Learn More

Send a Message to CPSC's Small Business Ombudsman ([Link](#))

Textile, Wool and Fur Acts and Rules

Product Category: Children's Clothing

Clothing imported or manufactured in the United States must carry a permanent (e.g. nylon patch or printed) textiles label. Its purpose is to inform the customer of the fiber composition.

Examples

- 100% Polyester
- 100% Cotton
- 98% Polyester 2% Elastane

Textiles types and names

You can only use the types and names of textile fibers listed in Part 303. See the first and second sources for additional information.

Other requirements

- Importer or manufacturer information
- English language
- Country of origin

Learn More

1. FTC Threading Your Way Through the Labeling Requirements Under the Textile and Wool Act ([Link](#))
2. PART 303 - RULES AND REGULATIONS UNDER THE TEXTILE FIBER PRODUCTS IDENTIFICATION ACT ([Link](#))
3. PART 300 - RULES AND REGULATIONS UNDER THE WOOL PRODUCTS LABELING ACT OF 1939 ([Link](#))
4. PART 301 - RULES AND REGULATIONS UNDER FUR PRODUCTS LABELING ACT ([Link](#))

Care Labeling of Textile Wearing Apparel & Certain Piece Goods

Product Category: **Children's Clothing**

Wearing apparel and “textile products sold by the piece from bolts or rolls for the purpose of making home sewn textile wearing apparel” imported or manufactured in the United States must carry a permanent care instructions label.

Label Information

- Dry cleaning instructions
- Washing instructions
- Bleaching instructions
- Drying instructions
- Ironing instructions
- Warnings

Label type

You can either write care instructions or use ASTM D5489 care symbols, or a combination.

 **Learn More:** Care Labeling of Textile Wearing Apparel & Certain Piece Goods ([Link](#))

ASTM D1230-17 - Standard Test Method for Flammability of Apparel Textiles

Product Category: **Children's Clothing**

ASTM D1230-17 covers flammability test methods for clothing textiles. This test method is different from the test method described in 16 CFR Part 1610 - Standard for the Flammability of Clothing Textiles.

ASTM D1230-17 can be used to voluntarily assess the flammability of clothing textiles not covered by the Flammable Fabrics Act.

Lab Testing

Third-party lab testing is required to verify compliance with the applicable standards/requirements.

 **Learn More:** ASTM D1230-17 ([Link](#))



Specifications

This part of the report is a general summary of product compliance requirements generated based on your selected inputs on the specifications page.

California Proposition 65

Do you intend to sell this product in California? Yes


California Proposition 65 restricts more than 800 chemicals and heavy metals in consumer products sold in California. Restricted substances include lead, cadmium, and other harmful substances.

Lab Testing

Third-party lab testing is the only way to verify that your product is compliant with California Proposition 65.

Warning Labels

Non-compliant products may need to carry warning labels.

 **Learn More:** About Proposition 65 ([Link](#))

Flammable Fabrics Act - Clothing Textiles

Does the Flammable Fabrics Act apply to your product? Yes

The Flammable Fabrics Act (FFA) provides flammability definitions and testing methods for textiles.

- a. 16 CFR Part 1610 - Standard for the Flammability of Clothing Textiles
- b. 16 CFR Part 1611 - Standard for the Flammability of Vinyl Plastic Film

Exemptions

16 CFR Part 1610 does **not** apply to Class 1 fabrics, which are considered to exhibit normal flammability behavior, and are therefore not deemed as risky. Class 1 fabrics are defined as the following:

- a. Plain surface fabrics (all fibers) with a minimum weight of 2.6 ounces per square yard (Approx 88.2 gsm)
- b. Any fabric (of any weight and surface) made of acrylic, modacrylic, nylon, olefin, polyester, and/or wool

Other Textiles

16 CFR Part 1610 does **not** apply to to the following products:

- a. Hats, provided they do not constitute or form part of a covering for the neck, face, or shoulders
- b. Gloves, provided they are not more than 14 inches in length and are not affixed to or do not form an integral part of another garment
- c. Footwear, provided it does not consist of hosiery in whole or part and is not affixed to or does not form an integral part of another garment
- d. Interlining fabrics, when intended or sold for use as a layer between an outer shell and an inner lining in wearing apparel

Requirements

16 CFR 1610 sets flammability requirements based on the fabric type:

- Plain surface textile fabric
- Raised surface textile fabric

16 CFR 1610 specifies testing criteria based on the fabric class and fabric type.

Example: Class 1 Plain Surface Textile Fabric

Burn time is 3.5 seconds or more. ACCEPTABLE (3.5 sec is a pass)

Example: Class 2 Raised Surface Textile Fabric

(1) Burn time is greater than 7.0 seconds; or

(2) Burn time is 0-7 seconds with no base burns (SFBB). Exhibits rapid surface flash only.

ACCEPTABLE.

Lab Testing

Third-party lab testing is required to verify compliance with the applicable standards/requirements.

Learn More

1. Flammable Fabrics Act ([Link](#))
2. Electronic Code of Federal Regulations ([Link](#))
3. PART 1610-STANDARD FOR THE FLAMMABILITY OF CLOTHING TEXTILES ([Link](#))
4. PART 1611-STANDARD FOR THE FLAMMABILITY OF VINYL PLASTIC FILM ([Link](#))

Flammable Fabrics Act - Children's Sleepwear

Is this product Children's Sleepwear? **Yes**

Children's sleepwear is covered by stricter fabric flammability standards listed below. Apparel intended primarily for sleeping is considered to be sleepwear.

- a. 16 CFR Part 1615 - Standard for the Flammability of Children's Sleepwear: Sizes 0 Through 6X
- b. 16 CFR Part 1616 - Standard for the Flammability of Children's Sleepwear: Sizes 7 Through 14

Lab Testing

Third-party lab testing is required to verify compliance with the applicable standards/requirements.

Learn More

1. CPSC requirements for adult and children's clothing ([Link](#))
2. Electronic Code of Federal Regulations ([Link](#))
3. PART 1615-STANDARD FOR THE FLAMMABILITY OF CHILDREN'S SLEEPWEAR: SIZES 0 THROUGH 6X (FF 3-71) ([Link](#))

4. PART 1616-STANDARD FOR THE FLAMMABILITY OF CHILDREN'S SLEEPWEAR: SIZES 7 THROUGH 14 (FF 5-74) ([Link](#))
5. PART 1610-STANDARD FOR THE FLAMMABILITY OF CLOTHING TEXTILES ([Link](#))

Model Toxics in Packaging Legislation

Is product packaging included? **Yes**

Many US states restrict certain heavy metals and chemicals in packaging materials, printing inks, and dyes. Packaging materials containing excessive amounts (e.g. more than 100 ppm) of restricted heavy metals and chemicals are non-compliant.

Examples

- Phthalates
- PFAS
- Cadmium
- Lead
- Mercury
- Hexavalent chromium

Lab Testing

Third-party lab testing is required to verify compliance with the applicable standards/requirements.

Certificate of Compliance

Importers and manufacturers may need to provide a certificate of compliance upon request. You can use the templates provided by the linked website.

Learn More

1. MODEL LEGISLATION ([Link](#))
2. States with Toxics in Packaging Laws ([Link](#))

Uniform Packaging and Labeling Regulation (UPLR)

Is product packaging included? **Yes**

The UPLR has been adopted in 45 of the 50 states. The UPLR requires the product packaging to bear a label containing the following information:

1. Product name
2. Name and place of business of the manufacturer, importer, packer, or distributor
3. If applicable, net quantity of contents in terms of one or more of the following items:
 - Weight (for example gram, pound)
 - Measure (for example meter, yard)
 - Volume (for example cubic meter, cubic yard)
 - Quantity (number of usable units)

Company Role

The company's connection to the product must be identified correctly. Here are some examples:

- Manufactured for and packed by [COMPANY NAME]
- Imported by [COMPANY NAME]
- Distributed by [COMPANY NAME]

Exemptions

See Section 11. Exemptions in the source for information about exempt products.

 **Learn More:** Uniform Regulations ([Link](#))

IMPORTANT

Scope: This report only covers packaging materials for general consumer products. For example, it does not apply to food packaging, chemicals, household products, or pharmaceuticals.

Labeling Requirements: Note that additional packaging labeling requirements may apply depending on the product, materials, and/or age group. Here are some examples:

- FCC Logo
- CPSIA Tracking Label
- Country of Origin


Bag Suffocation Warning

Is this product packed in a plastic bag? Yes

Bag suffocation warning label texts are mandatory for all Amazon sellers and in certain US states.

Amazon Example

Warning: To avoid the danger of suffocation, keep this plastic bag away from babies and children. Do not use this bag in cribs, beds, carriages, or playpens. This bag is not a toy.

 **Learn More:** Packaging and prep requirements ([Link](#))



Country/Market

These compliance requirements broadly apply to consumer products in your selected country or market. Note that this is a general summary and there are exceptions.

Country of Origin

Market: **United States**

Country of origin labeling (e.g. Made in Vietnam) is mandatory for most products imported and sold in the United States. The product and the packaging must have a permanently affixed country of origin label.

Learn More

Marking of Country of Origin on U.S. Imports ([Link](#))

Manufacturer/Importer Information

Market: **United States**

Manufacturer/Importer information on the product and packaging is required for many products in the USA. Here is some information that you may need to include:

- Brand/Trademark
- SKU/Product ID
- US company name
- US company address
- US company contact details (e.g. email and phone number)

Batch ID/Traceability Number

Market: **United States**

Batch IDs are used to help trace products to certain production runs (batches) in case of quality or safety issues arise. Batch IDs are often mandatory and may include the following elements:

- SKU/Product ID
- Order/Manufacturing date
- Production Facility
- Country

Example

- SKU: ABC01
- Production Location: Shenzhen, China
- Production Date: June 2020

Batch Number: ABC01-062020-SZ1-CN

CPSC Standards & Regulations

Market: **United States**

CPSC standards set compliance requirements for a wide range of consumer products, both children's products, and non-children's products. Follow the link below for an overview of product regulations.

Examples

- CPSA
- FHSA
- PPPA


 **Learn More:** Regulations, Laws & Standards ([Link](#))

Regulations, Mandatory Standards, and Bans

You can find a list of CPSC standards and bans covering consumer products, packaging, and specific substances in Regulations, Mandatory Standards, and Bans (see link).


Lab Testing

Third-party lab testing is required to verify compliance with the applicable standards/requirements.

 **Learn More:** Regulations, Mandatory Standards, and Bans ([Link](#))

General Certificate of Conformity (GCC)

Importers and manufacturers of certain products must also issue a General Certificate of Conformity (GCC). The GCC includes information about the importer/manufacturer, product, standards, and testing.

 **Learn More:** Rules Requiring a General Certificate of Conformity (GCC) - General Use/Non-Children's Products ([Link](#))

CPSC Small Business Ombudsman

The CPSC Small Business Ombudsman can help you confirm current CPSIA and other CPSC product compliance requirements.

 **Learn More**

Send a Message to CPSC's Small Business Ombudsman ([Link](#))

ASTM Standards

Market: **United States**

ASTM standards cover general product safety, quality, performance, and testing procedures, for a wide range of products. While implementing ASTM standards is often voluntary (for non-children's products), it's still recommended as importers and manufacturers are still responsible for ensuring that their products are safe to use.

Examples

a. ASTM F963 - Standard Consumer Safety Specification for Toy Safety

b. ASTM F2643-15, Standard Specification for Powered Pot, Pan and Utensil Washing Sinks

c. ASTM F2417 -Standard Specification for Fire Safety for Candles

Lab Testing

Third-party lab testing is required to verify compliance with the applicable standards/requirements.

How to find standards for your product

1. You can find ASTM standards on www.astm.org
2. You can request a free lab test quotation to get an assessment of required/applicable standards for your product

Learn More

What is an ASTM standard? ([Link](#))

US State Regulations/Standards

Market: United States

Products sold in the United States are also subject to US-state regulations, safety standards, substance restrictions, labeling requirements, documentation requirements, and other compliance requirements. Here are a few examples:

- California Proposition 65
- Technical Bulletin 117-2013
- RoHS
- US Law Label

Some US state-level regulations may be included in this report. However, this report does not cover the majority of US-state regulations, standards, and other requirements that may apply to all or certain consumer products. We recommend that you request a third-party lab testing company to get an assessment of which regulations, standards, and other requirements may apply in the relevant US states.

Lab Testing

Third-party lab testing is required to verify compliance with the applicable standards/requirements.

Language Requirements

Market: United States

Product labels (e.g. country of origin and warning labels) and compliance documents are generally required to be written in English.

Important: The PDF is saved in My Reports and can be downloaded at any time. Notice that you must log in on www.compliancegate.com/account to access the My Reports page.

Next Step:

Option A: Read Official Sources: We link to official website sources in this report under **Learn more**, where you must go to find additional information about each topic.

Option B: Request Free Lab Test Quotation: Testing companies can help you verify if your product is compliant and provide a more specific assessment of applicable regulations, standards, and substance tests for your product. Further, testing companies normally stay up to date with new or updated regulations, standards, and other requirements.

[Request a Free Lab Test Quotation](#)

Found an error or is something missing?

Please send an email to info@compliancegate.com if you think the information is outdated, incorrect, or missing in this report.