

**1) What are the compliance requirements?**

- a) Following regulations should be referred for general consumer/gardening products:
  - i. American Society for Testing & Materials (ASTM) Standard F1505-16 covers various hand tools. This standard provides procedures to evaluate tools via visual and dimensional checks, ambient temperature and extreme low temperature impact tests and other related tests. This is an optional Standard to follow, however failing to match the quality of product as suggested by this standard may lead to recall of the product by CPSC. Also, certain tools/equipment are subject to specific ASTM standards. Thus, exporters are required to check the applicability of standards to their products.
  - ii. Toxic Substances Control Act (applicable for wooden products): Manufacturer is required to comply with the formaldehyde emission limits established by TSCA Title VI. Testing for the same should be conducted by the manufacturer. Basis the test, exporters need to obtain a certificate from their Importer on Record (IOR). This is a mandatory requirement.
  - iii. For most of the consumer products, the country of origin is required to be mentioned on label. This requirement can be referred in the following link:  
<https://www.cbp.gov/trade/rulings/informed-compliance-publications/markings-country-origin-us-imports>
  - iv. As per Federal Trade Commission (FTC), many consumer products are required to have manufacturer details on the label along with batch/ traceable information about the product
  - v. Consumer Product Safety Commission (CPSC) sets standards for compliance of wide range of consumer products, a few being Consumer Product Safety Act, Labeling of Hazardous Art Materials Act, Flammable Fabric Act, Poison Prevention Act, Federal Hazardous Substance Act etc.

**2) When are the compliance requirements needed? How often are the requirements needed?**

- a) Compliance requirements on the above manufacturing standards are mandatory. These regulations are continuous requirements and hence exporters are required to follow the standards for every batch
- b) Labeling is required once for every product and should be done before sending the shipment to USA
- c) Regulation with TSCA is required to be complied during the process of manufacturing, hence it can be considered as continuing process for each batch

**3) Links for reference:**

<https://www.astm.org/industry/all-agriculture-standards.html>  
<https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/fair-packaging-labeling-act-regulations-0>

**Additional requirement:**

If the products have chemical components, a **MSDS** (Material Safety Data Sheet) and a **COA** (Certificate of Analysis) are required with the shipment. These documents are prepared by the manufacturer and helps to understand the potential health and physical hazards of the chemical components, details of lab testing reports and product specifications like components, characteristics, etc. COA is issued for every batch of production.

Link for reference on MSDS: <https://www.osha.gov/sites/default/files/publications/OSHA3514.pdf>