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Basic Product Safety Information

I've been working with the product safety issue for a couple of years now and thought it would be helpful if I shared some of the key issues, at least from my perspective.

Lots of good questions have surfaced in the last week as a result of our product safety quick quiz in AccountPro. More information will be coming but I hope this answers some of your questions and gives you an additional resource if you want to dig in deeper.

There are two important points to keep in mind.

- First, the driving force behind the emphasis on product safety is the change to the Consumer Product Safety Improvement Act (CPSIA) made in 2008. This is now the law of the land and there are stiff penalties for violating it.
- Two, our position on product safety and the steps we've taken to protect your customers is a competitive advantage. Not all distributors are doing this. Many still don't even have this issue on their radar.

Risky Products

1. Children's products are the riskiest and request the greatest care for two reasons. One, the allowable levels of lead, cadmium and other chemicals is lower. Two, there's a permanent tracking label requirement for any children's product going to a child under 12 years of age. The definition of what is a children's product is not as clear as you may think. Several factors are involved, including: was it designed for and intended for children; does the imprint or decoration on it transform it from an adult item to a children's item; was the product given to a range of ages or primarily children under the age of 12?
2. Drinkware's on the list because the traditional inks used to decorate drinkware have levels of lead that will not pass the new requirements. In addition, California's Prop 65 has additional restrictions for anything ending up in their state.
3. Promotional jewelry has traditionally used lead in the base metal and the inks used for decoration have contained lead and other chemicals above the new standards.

Safe Products

There are some products with low risk that are not much of a concern.

- Paper products are usually not a problem if they are offset or digitally printed. Unusual deco methods, that may have lead in the inks, need to be discussed.
- Embroidered apparel is low risk, unless it's a youth size because then it's a children's product and subject to the tracking label requirement. (To further complicate things, children's apparel needs two tracking labels if the decoration is done by someone other than the manufacture.) The other hazard with embroidery is metallic thread. The decorator needs to be consulted to make sure the metallic thread is CPSIA compliant.

Safe Suppliers

There are no guarantees, but the product safety documentation packet we've required our preferred and accommodation suppliers to sign gives us a high level of confidence that these suppliers understand the regulations and are following them. On top of that, we're protected by indemnifications and their insurance policies in the unlikely event of a problem.

We're working as fast as we can to get many more request lines suppliers approved and will share that list with you. Orders from approved suppliers will flow quickly through our system even if they are for one of the riskier products. The more approved suppliers we get the better it will be for all of us.

What to Ask a Supplier

In the meantime, what questions can you ask a non-approved supplier, up front, so you don't waste your time?

- Are you CPSIA compliant? If they don't know what you're talking about, move on. If you have to educate them about the regulations, I guarantee they have not tested their products.
- Can you send me a copy of the GCC for this product? If a supplier says they are CPSIA compliant, then they should have a GCC (general certificate of conformity) for that product. The GCC let's you know that the product was tested at some point. It's not a test of the latest batch, but it tells you that at some point in the past, a sample of this product was tested and these are the results. If a supplier says they are CPSIA compliant and they can give you a GCC, you can be pretty confident in them.
- Is this considered a children's product? If you're wondering whether something is for kid's or not start by asking the supplier what they think? If they say yes, ask if they've tested the product and how are they handling the permanent tracking label requirement. If their answers sound plausible, move forward with them.

Resources

- PPAI has an extensive library of articles and recorded webinars if you want to dig in deeper.
- The government's CPSIA site has the actual regulations and additional information, too.
- We will also be releasing additional information and resources for you in the next few weeks.

I hope this helps. As I said at the beginning of this message, product safety and the way you approach it can be a positive if handled correctly. Look for much more on this issue soon!

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