JPMA Certification 2.0
Frequently Asked Questions

1. **Why did JPMA decide to enhance the Certification Program?**

   With increased regulatory scrutiny, the juvenile products manufacturing industry demanded a turn key solution to respond to the increased testing responsibility at the state and Federal levels. Additionally, the industry has been incurring the expense and burden to meet all requirements and duplicative testing through major retailer programs for many years. The goal of Certification 2.0 is acceptance by retailers as precluding the need for duplicative retailer testing. The JPMA Certification Program is a natural program to fulfill requirements and reduce duplicative testing.

2. **How does Certification 2.0 differ from the old Certification Program?**

   The JPMA Certification Committee has created the JPMA Protocols which outline the testing requirements in the program. These protocols incorporate all Federal and state requirements as well as some of the requirements that the major retailers have in common. Additionally, JPMA eliminated the Random Retail testing portion of the program and replaced it with a focus on pre-market testing in the manufacturing process and Pre-Market Certification of products. Finally, third party testing using an appropriately accredited independent laboratory must be completed when participating in Certification 2.0.

3. **What is the JPMA Certification 2.0 doing to cover 'undue influence"?**

   Laboratory Accreditation requires safeguards. In addition we encourage contractual provisions to include the following language:

   "In connection with its representation and warranty that goods provided under contract shall meet all applicable U.S., EU and ISO product safety regulations, Vendor is obligated to restrict and protect against any form of undue influence related to the selection of representative samples, testing and preparation of test reports or legally required Certificates of Compliance, involving the subject product. Failure to do so constitutes a material breach of this contract resulting in its rescission and any and all damages or expenses arising out of such breach including, but not limited to lost profits and any reasonable expenses directly or indirectly arising as a result of the inappropriate existence of such undue influence."

   Applicants and participants will also be required to sign an addendum to the current agreement outlining the following: "Applicant has in place a policy that

restricts undue influence in the selection or representative samples of products or materials. Unless otherwise specified. Applicant further represents and warrants that all samples selected or provided under the Program are or will be representative of production product or materials and have been selected without undue influence".

4. **Can a manufacturer still complete testing in their own facility?**
   Third party testing using an appropriately accredited independent laboratory must be completed when participating in Certification 2.0. The law permits a laboratory that is owned, managed, or controlled by a manufacturer or a private labeler, to apply for CPSC approval if it puts extra safeguards in place. These labs, known as "firewalled labs," may only be accredited by order of the CPSC. If you operate a firewalled lab, you can conduct testing for specific tests that the CPSC has accredited your lab to perform. Test results must be transferred to the Program Administrator to fulfill the program requirements.

   Additionally, manufacturers can still utilize their own labs for quality checks and internal testing outside of JPMA Certification. JPMA still offers auditing services through the Program Administrator if participants wish to take advantage of that service.

5. **Which laboratories are supporting Certification 2.0?**

   SGS serves as the Program Administrator and Principal lab. BV and ITS are Supporting Labs in the program. Testing results from BV and ITS must be transferred to the principal lab (SGS) in order to fulfill the requirements of the program. As the law denotes, JPMA also accepts test results from CPSC accredited third party laboratories under the Certification 2.0 program. Testing results can be transferred to the JPMA supporting labs or principal lab for acceptance. Details on this can be found in the JPMA Procedural Guide.

6. **The Procedural Guide states that you must choose which laboratory you want to work with for Certification in each product category. Does this mean that we need to choose one lab for all of our testing in a particular category?**

   Participants have the flexibility of choosing one laboratory for each product category they participate in. For example if a program participant makes cribs and play yards, they need to choose one test laboratory for all of their crib testing and one test laboratory for all of their play yard testing. Participants can use any of the laboratories, but if they use BV, ITS or a CPSC Accredited lab, they must have their test results transferred to SGS.

7. **I hear that I have to purchase a license to access the Program Administrator's database. What are the details and what is the cost?**

The Program Administrator (SGS) has an IT system called DataManager. There is no requirement for the participant to use DataManager, but if a participant does not use it they will not have the luxury of accessing test reports electronically at their leisure from SGS.

The data that is entered into DataManager will not be entered by the participants. Instead data entry would be handled by whichever laboratory did the testing. If you are utilizing a testing lab other than SGS, their access to DataManager is limited to:

- Entering the data required for the Service Request.
- Uploading the test report to the Service Request.
- Viewing the Service Request and related document that a specific user has entered.

Laboratory users (other than SGS) will not have access to reporting or dashboards in the system. More information about user licenses for DataManager can be obtained by contacting SGS. Please email JPMA Certification Program Director Lisa Trofe (ltrofe@jpma.org) for contact information.

I don't sell to the mass retailers. What's in it for me?

Certification 2.0 is a one stop shop and includes requirements for all the mandatory Federal, state and ASTM standards for your products. JPMA has negotiated protocol testing price discounts with SGS, BV and ITS for participants in the program. JPMA has used a subset of product categories to analyze the cost savings for members and non-members, and found that by participating in the JPMA Certification Program you will benefit from more testing (mandatory, Federal, state, ASTM ***and*** mass retailer) for less costs. These cost savings include approximately 20% - 50% discounts depending on product category and membership status. Regardless of whom you currently sell to, program participants win when it comes to testing prices. Additionally, if your future goals are to sell to mass retailers, you can assure them that you are already meeting their requirements by participating in JPMA Certification 2.0.

8. What are the cost implications for participating in Certification 2.0?

These fees have not changed. Members who participate in the JPMA Certification Program pay $1,640. per product category. Non-members who participate in the program pay $2,800. Additionally, JPMA has negotiated protocol testing price discounts with SGS, BV and ITS and these represent best industry pricing. These quotes can be found on the JPMA Protocol Test Prices spreadsheet. JPMA has developed the protocols in such a way that they are applied in the most economic way to benefit you. Please note that not all protocols are applicable to every product, and some products require different

testing based on the material content of the product. It is best to obtain a quote for your product from the participating laboratories to determine the applicable cost.

9. **What is a pre-market sample? Does the sample have to come from the actual production line?**
   Pre-market sample must be a representative sample as defined by CPSC which defines a representative sample as one that is identical to the certified production product in all material respects. For Production Surveillance a representative sample is one that is known to be representative of the population of products manufactured since the last periodic test (or since the pre-market certification for the first periodic test).

   The Participant must retain evidence identifying the pre-market sample in such a way to describe the design of the sample tested. This can be done by (a) retention of the tested sample, or (b) sample from the same production lot or (c) documentation that defines the design of the model (e.g. - Bill of Materials, drawings of the complete sample, etc.). The manner and means of describing the sample selected are at the option of the Participant.

   Program Participants will be required to certify by signature via the test report form (for example see Form C) that the sample is representative of the population of products manufactured since the last periodic test.

10. **Where can I locate the JPMA Certification Procedural Guide and Protocols?**

    The JPMA Certification Procedural Guide and Protocols can be found in the members' only section of jpma.org or by contacting JPMA at or 856-642-4416.

11. **If I have product already on the market that is not JPMA certified, can I still have it tested and certified to 2.0? If so, is Pre-Market Certification relevant?**

    In many cases Pre-Market Certification is exactly that, a certification of the product before it hits the market. However, Pre-Market Certification is required for any participant to enter into the JPMA Certification Program. It allows the laboratory to ensure that products are actually meeting the standards and protocols and are therefore compliant with JPMA Certification 2.0.

12. **Are retailers currently accepting JPMA Certification 2.0?**

    JPMA continues to work with retailers to outline JPMA Certification 2.0 and discuss their acceptance of the program. This is a major goal of the JPMA Board

of Directors and they are engaged in discussions with retailers to address the duplicative testing concerns that our industry faces.

However, as of 2014, Wal-Mart has accepted the JPMA Certification 2.0 program, to the end that as the two protocol requirements line up, those test reports will be accepted by Wal-Mart so that the product will not be required to undergo duplicative testing. Wal-Mart does have additional testing protocols that are not included in the Certification 2.0 program and successful testing to those protocols must be completed for Wal-Mart.

13. If I test under a retailer program, can I transfer the test results to comply with Certification 2.0?

JPMA has written Section 4.8 of the Procedural Guide to guide participants on the rules for transferring test results. The laboratory must ensure that these outlined requirements are met in order to fulfill the program requirements. JPMA has engaged and is in ongoing discussions with major retailers to reach agreement that the Certification 2.0 test results can be accepted by them. While we believe it is possible to transfer testing results for Certification 2.0, we encourage all manufacturers to review their contracts with the retailers to ensure the manufacturer is the owner of their test reports, therefore allowing for that report to be transferred fulfilling the Certification 2.0 requirements.

14. How many samples do I need to send to the lab for testing?

Please see the chart in the members' only section of jpma.org for a suggested number of samples that each lab requests, by product category. Note that sending less than the requested number of samples can result in a delay in your testing process. If you have questions or would like to confirm the number of samples you should send, you should always discuss with your lab representative during the quote process.

15. I am new to the Certification Program, how do I apply?

In order for a manufacturer to have their products JPMA Certified, they must submit an application and contract to the Juvenile Products Manufacturers Association (JPMA) to participate in the certification program. Participants can be either a member or non-member of the association. Applicants can visit the members' only section of jpma.org and/or contact JPMA at 856.642.4416 or via email at jpma@jpma.org.

16. I've been through initial testing, what do I do if I have a new product I am bringing to market?

Anytime you are bringing a new product to market, you must conduct Pre-Market Certification as outlined in the JPMA Procedural Guide. This includes products in categories that you are already certified in. Note failing to conduct Pre-Market

Certification for a product category you are already certified in is a violation of the program requirements and will result in corrective action notification from JPMA.

17. Can I just certify one model in my line?

If a manufacturer wants to participate in a specific product category of the Certification Program, then all of their models in that category must be tested and pass the JPMA Protocols to be certified.

18. How does JPMA plan to market the Certification Program?

JPMA has dedicated nearly three quarters of a million dollars to market the Certification Program to consumers, retailers, government officials, manufacturers and the media. This is by far the most the association has ever dedicated to this effort and the plan is aimed at gaining consumer recognition of the JPMA Certification Seal and educating them on the safe selection and use of juvenile products.

19. I make products that JPMA does not currently certify. Will JPMA expand the program at any point to include more product types?

Program expansion is a goal for JPMA in 2015. We are reviewing options for how we can expand the program to test or certify products that do not have an ASTM standard, the foundation on which the JPMA Certification Program has historically been built. More information will be shared as it becomes available.