INTERNATIONAL FEDERATION OF INSPECTION AGENCIES

CODE OF PRACTICE

CONSUMER PRODUCT TESTING

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EXECUTIVE SUMMARY

Goal: This Code of Practice for the Consumer Product Testing (Code) sets out the technical guidance for the IFIA members in the implementation of the ISO/IEC17025 by seeking to enhance the transparency of the data in the test reports issued by the Third Party (TP) laboratories, ensuring the integrity, consistency and reliability of the testing process.

Scope: This Code covers Toys, Hardline and Softline Consumer Goods and excludes Cosmetics & Personal Care Products and electrical testing requirements of products. This Code shall be followed by all IFIA members involved in the testing of the afore mentioned consumer goods. Furthermore, IFIA encourages non IFIA members involved in the testing of afore mentioned consumer goods to also follow the practises set out in this Code.

Rationale: Greater transparency with precise and detailed historical information in the test reports will ensure that all the stakeholders have clear and concise visibility as to the source of the data contained within that report.

Good Practice: TP laboratories shall follow the practices recommended in this guide in the following situations:

1. Referencing test results for the materials/components previously tested
2. Referencing test results from the reports issued by the other TP labs
3. Performing tests on a single style/design of the product as a representative of multiple styles/designs (grouping)
4. Accepting documents in lieu of testing for certain test parameters

These practices must be supported by proper documentation and this information must be reflected in the new TP testing report so stakeholders have greater visibility to which tests are being conducted and which test results are being transferred from other reports.

When conducting component testing or grouping, test reports must also clearly indicate which materials/components/styles are being tested as part of the finished product report and identify the corresponding applicable standards or regulations.

This Code is intended to support the due diligence expected from the manufacturers and importers in meeting their legal obligation to demonstrate compliance with the applicable standards and regulations.

1. INTRODUCTION

The purpose of this Code of Practice is to set out the general standards of delivery and performance that can be expected of an IFIA Member Company in the execution of its duties in relation to the consumer product testing. Specifically, the goal of this Code is to set out technical guidance for the IFIA members in the implementation of ISO/IEC17025 by enhancing transparency of data in test reports issued by the Third Party (TP) laboratories.

Though this Code, the Testing, Inspection, and Certification (TIC) industry, manufacturers, importers, distributors, retailers, regulators and other interested stakeholders will understand the scope of good industry practices that are critical to preserving the integrity of the independent testing labs as responsible members of the supply chain.

The Code covers Toys, Hardline and Softline Consumer Goods and excludes Cosmetics & Personal Care Products and electrical testing requirements of products. This Code shall be followed by all IFIA members involved in the testing of the afore mentioned consumer goods. Furthermore, IFIA encourages non IFIA members involved in the testing of afore mentioned consumer goods to also follow the practises set out in this Code.

IFIA has no responsibility or liability for acts or omissions of members or others making use of this Code of Practice.

2. BACKGROUND

In today's ever expanding regulatory and safety conscious environment, increased efforts are being taken to protect the consumer which has resulted in increased responsibility and higher scrutiny on the safety and compliance of the products on those who make, import, and sell the consumer products. A number of new mandatory testing and certification requirements have come into effect for the consumer products and the children's products, including extensive new record-keeping requirements.

The expansion of the regulatory requirements, underpinning improved consumer protection has become more stringent at a time when the consumers are becoming more cost conscious and are better informed, which continue to increase their demand for a safe product at affordable prices.

While the vast majority of the manufacturers/suppliers remain diligent and determined to ensure their products meet the regulatory and safety requirements, this increased cost of compliance has resulted in some buyers and manufacturers seeking ways to make testing more efficient to increase their competitiveness by adopting risk based approaches to lower the cost of compliance. However, if not done correctly, this may result in misleading test reports being presented to buyers and even noncompliant or unsafe product being sold to the consumers.

In this context, this Code of Practice will provide greater transparency of data and precise and detailed historical information in the test reports. It will ensure the owners of the test reports have clear and concise visibility as to the source of the data contained within that report and support the manufacturers, importers, suppliers, distributors and retailers in ensuring products meet the regulatory and safety requirements.

This Code could encompass many elements, however consideration at this time has been given to the critical areas that need to be addressed to ensure national and international standards and norms are followed, accreditation conditions are upheld and reduce the risk that noncompliant or unsafe products are placed on the market.

This Code is intended to support the due diligence expected from the manufacturers and importers in meeting their legal obligation to demonstrate compliance with the applicable standards and regulations.

3. TRENDS IN REGULATORY REQUIREMENTS

Regulators have published rules and regulations to establish and validate compliance with the requirements for the general consumer products and the children's product, including documentation and traceability requirements.

For example, the product certification rule in the United States (16 CFR 1107) mandates that the domestic manufacturer, or importer is responsible for compliance with the product safety and the certification requirements. It is expected that manufacturers and importers follow good manufacturing practices to establish "high degree of assurance" that all products they manufacture are compliant.

In many countries, nothing prevents the manufacturer or importer to rely on component part testing when referring to test results or certification provided by the supplier who has already tested its product (the component part). However, the manufacturer must exercise a standard of "due care" when relying upon the component part certificate or component part test results.

A clear expectation from regulators is that the manufacturers and importers should not solely rely on contract obligations with the vendor or simple attestation or guarantee letters from the suppliers.

Another example would be record keeping expectations that is also inherent in technical file requirement for safety of toys per Article 21 of the EU Directive 2009/48/EC or European Regulation (EU) 2016/426 (appliances burning gaseous fuels) and EU Directive 89/686/EEC - personal protective equipment.

Third party test labs serve an important function by helping the manufacturers and importers meet the product safety validation needs. With the complexity of the global supply chain, TP laboratories play an important part in the process by educating the suppliers and buyers on the applicable product safety requirements and an understanding of the standard of due care and robust production testing plans as these elements relate to the certification needs.

For the purposes of this document, TP laboratories are assumed to be contracted to only test products, therefore they are not providing the following services, unless specifically contracted by the client:

- TP laboratories are not auditing the manufacturers' supply chains to ensure traceability and documentation controls
- TP laboratories are not aware of material change when receiving a request from manufacturers to reference data from the old test reports or reports issued by the other labs
- TP laboratories referencing test results from reports issued by other labs, where contractually required by the customer, are not checking if those labs met the applicable accreditation requirements
- TP laboratories are not verifying if the sample is representative of entire production
- TP laboratories are not verifying if the manufacturers have reasonable testing programs in place to support these practices

Two critical elements of the Industry's Testing Code of Practice are:

- A list of good industry practices that address the use of customer provided testing data, reports and declarations and also the requirements for reporting and disclaimers.
- Technical Guidance to supplement the good practices to be adopted by the industry for consistency of

implementation.

4. GOOD INDUSTRY PRACTICES

ISO/IEC 17025 provides the framework on how reporting should be done. The following list identifies good practices with respect to the documentation review and data transfers that are addressed in Phase 1 of this initiative[1], with the aim of providing more detailed technical guidance for IFIA members in the implementation of ISO/IEC17025.

These Good Industry Practices shall be applied unless legal requirements require otherwise.

Practice	Industry Position
1. Referencing test results for materials/components previously tested	The reporting has to follow the basic guidelines of ISO 17025. Certain approaches to reduced testing based on the component testing rules for common components and materials are allowed when supported by proper traceability and documentation showing the linkage between such components and prior test results. Practice: Traceability of the documentation of the components from previous test reports is critical and shall be **clearly reflected within the test reports produced by the TP lab**. **Such test reports must clearly indicate which materials are being cross-referenced as part of the finished product report**[2]. See section 5 for parameters that must be cited in the finished report. Recommendation: It is recommended that these referenced original test reports shouldn't be typically older than one year

[1] An additional set of good industry practices are under further review will be addressed in phase 2. The phase 2 of this initiative will specify separate technical guidelines through a similar consensus process as in phase 1.

[2] This information is to just identify that the specified test results are being transferred from another test report and not to confirm or validate that these components are actually representative of the components previously tested.

2. Referencing test results from reports issued by other labs	The reporting has to follow the basic guidelines of ISO 17025. Certain approaches to reduced testing based on component testing for common components and materials are allowed when supported by proper traceability and documentation showing the linkage between such components and prior test results. Practice: Traceability of the documentation of the components from previous test reports is critical and shall be **clearly reflected within the test reports produced by the TP lab**. **Such test reports must clearly indicate which materials are being cross-referenced as part of the finished product report**[3]. See section 5 for parameters that must be cited in the finished report. In addition, recognitions of another labs' reports must be subject to certain minimum criteria: - ILAC-MRA ISO 17025 test lab - Retail program qualified / nominated (when applicable) - For Non-accredited or labs that are not retail qualified, the TP laboratory accepting the results is responsible to verify that the external lab meets the relevant requirements of ISO 17025. Recommendation: While it is the responsibility of the manufacturer or importer to ensure that testing has been performed by an approved lab with correct methods on its approved scope, the lab receiving and reviewing the prior test results shall reserve the right to request additional information and/or refuse to reference the prior test result from another test lab. It is also recommended that these referenced original test reports shouldn't be typically older than one year.

[3] This information is to just identify that the specified test results are being transferred from another test report and not to confirm or validate that these components are actually representative of the components previously tested.

3. Perform tests on a single style of the product as a representative of multiple styles.	This practice is generally called Grouping when dealing with product assortments. Practice: The report should clearly list and identify the component for the product grouping that were tested. That is the report must explicitly identify what products or components were actually tested per customer instructions and to which standards and/or regulations. Recommendation: In the event the TP lab report covers an assortment or grouping with common parts, the report could also indicate which products were not tested. Where applicable, specific guidance (to be developed) for representation of Grouping based test results technical guidance document should be followed.
4. Document acceptance in lieu of testing for certain test parameters.	It is common practice for importers and retailers to allow document acceptance in lieu of testing for certain testing parameters as part of their quality procedures. TP service providers adopt procedures consistent with the program guidelines established in the quality manual for each importer or retailer. Practice: In the event that the TP lab report is referencing document acceptance for a specific test, the same approach and recommendation must be followed as stated above in item 2.

5. PARAMETERS:

The following list depicts the various information parameters that must be captured in the TP test report, when results are referenced from another report that may be from the same or another lab location:

- Original Test Report Number
- Test Lab Name and Location
- Identification of component(s)
- Requirements (Standards/ Regulations)
- Test Date
- Subsequent test report Number & lab name and location (when applicable)

6. ENFORCEMENT

Enforcement actions will follow existing IFIA Rules and Regulations. If a third-party or another IFIA member complains to IFIA about an IFIA member not complying with this Code, the IFIA Complaints and Disciplinary Procedures should be followed[4].

7. CONCLUSION

There are significant benefits for all stakeholders by ensuring that the technical elements in the testing process remain consistent, reliable and professional and that the integrity in the testing process is maintained.

With the collective support of the IFIA members of the TIC industry behind this initiative, the industry is convinced that there will be a positive impact on the effectiveness and efficiency of the testing processes in addition to protecting the public safety and the end consumer. The goal of implementing this industry Testing Code of Practice is to enhance the credibility of industry's deliverables for its clients issued in the form of the test reports and thus preserve the integrity and reputation of the industry. The IFIA members are committed to a high standard of integrity demonstrated by this proactive initiative and we encourage other non-IFIA TIC industry players to follow this example in the spirit and the practice.

[4] http://www.ifia-federation.org/content/wp-content/uploads/Council_Reg._4.pdf