Baby Safety Alliance Verification Program

Procedural Guide

Categories:

High Chairs (ASTM F404 & General Prohibition)
Non-Full-Size Baby Cribs/Play Yards (ASTM F406 & SOR 2018-186)
Carriages & Strollers (ASTM F833 & SOR 2023-101)
Infant Walkers (ASTM F977)
Expansion Gates & Expandable Enclosures (ASTM F1004 & SOR 2016-179)
Full Size Baby Cribs (ASTM F1169 & SOR 2016-152)
Portable Hook-On Chairs (ASTM F1235)
Toddler Beds (ASTM F1821)
Infant Bouncer Seats (ASTM F2167)
Infant Bath Seats (ASTM F1967)
Stationary Activity Centers (ASTM F2012)
Infant Floor Seats (ASTM F3317)
Infant Bathers (ASTM F3343)
Baby Monitors (ASTM F2951)
Child Safety Locks & Latches (ASTM 3492-21)
Bibs & Burp Cloths (FDA)
Infant/Children's Tableware & Food Storage (FDA)
Hand-Held Infant Carriers (ASTM F2050)
Infant Swings (ASTM F2088)
Bassinets & Cradles (ASTM F2194 & SOR 2016-152)
Portable Bed Rails (ASTM F2085)
Soft Infant Carriers (ASTM F2236)
Baby Changing Products (ASTM F2388)
Frame Child Carriers (ASTM F2549)
Children's Folding Chairs (ASTM F2613)
Booster Seats (ASTM F2640)
Infant Bath Tubs (ASTM F2670)
Bedside Sleepers (ASTM F2906)
Rockers (ASTM F3084)
Sling Carriers (ASTM F2907)
Crib Mattresses (ASTM 2933)
Nursing Pillows (16 CFR 1242)
Child Restraint Systems (FMVSS & SOR 2010-90)
Infant Feeding (FDA)
Children's Cups (FDA)
Pacifiers (16 CFR 1511)

HOW THE BABY SAFETY ALLIANCE VERIFICATION PROGRAM WORKS

The Baby Safety Alliance currently sponsors thirty-six (36) verification categories for Juvenile Products in the Verification Program.

The purpose of the verification program is to assure the consumer, by the presence of a verification seal (and listing in a directory), that the products bearing the seal comply with the requirements of the current applicable ASTM standards, Canadian standards and Federal requirements (16 CFR), which meets the requirements of ISO-IEC Guide 23.[1]

As sponsor of the program, Baby Safety Alliance retains appropriately accredited, independent testing laboratories, BUREAU VERITAS, INTERTEK and SGS, to perform the tests of samples on a periodic basis. Samples are tested for compliance with all sections of the applicable Baby Safety Alliance protocol requirements and the Procedural Guide for the Verification Program.

The program is open to all manufacturers, both members and non-members of Baby Safety Alliance and to firms that market private brand models. Participation in the program is on a voluntary basis. All model numbers manufactured or directly marketed by a program licensee for sale in the United States must comply with the current applicable Baby Safety Alliance protocol requirements for that manufacturer or distributor to be Baby Safety Alliance Verified.

[1] https://www.iso.org/files/live/sites/isoorg/files/archive/pdf/en/iso_iec_guide_23_1982.pdf

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Administrator	A person or organization designated by the sponsor of a verification program to perform the executive duties and record keeping required to manage the affairs of that program.
Alternate Test Facility	Independent testing laboratory chosen by the Participant which is approved by the CPSC and accredited by an ILAC accredited assessor, (e.g., the American Association for Laboratory Accreditation -- A2LA), for the relevant field of testing of products.
Annual Verification Testing	Follow-up sample submission test requests by a manufacturer. Annual testing is required at least once every 365 days from the date of the last issuance of the previous passing initial/annual test report. NOTE: Refer to Section 4.4, Product Changes, for rules and guidance on retests on product changes. A change may or may not require a reset to the annual test date.
Basic Model	The representative product of a family of an identical construction/design. Each site of production will be verified as a separate base model.
Family	A family is a combination of a basic model and the corresponding modification models that have the same construction/design.
Initial Verification Testing	Either (1) the first sample submission test request by a manufacturer entering a new juvenile product category or (2) a new model sample submission test request by a manufacturer for a category the manufacturer currently participates in.
Inspection	The process of examining, measuring, testing, gauging, or otherwise comparing the unit of product or service with applicable provisions of referenced standards or specifications, and review of compliance with provision(s) of the verification procedure.
Modification Model	Any model that is structurally identical to the basic model and only differs in areas such as style number, color, etc. The differences from the basic model must not affect the model's compliance with the performance requirements of the Baby Safety Alliance protocols.
Program Participants	A manufacturer that is involved in the Baby Safety Alliance Verification Program. Program Participants test their products to confirm

	compliance to the relevant standard(s), and only distribute product models that comply with that standard.
Principal Laboratory	Independent testing and inspection agency designated by the Baby Safety Alliance (program sponsor), as the Program Administrator. This lab must receive all testing results from other laboratories including Supporting Laboratories and CPSC Accredited Laboratories
Pre-Testing	A submission by a manufacture that is not an official Baby Safety Alliance submission request. A pre-test submission may be for one specific test or for multiple tests. A pre-test submission may also be referred to as pre-market test request submission or a preliminary test request submission. NOTE: Pre-test submissions are not Baby Safety Alliance submissions and therefore do not require a Baby Safety Alliance issued test report.
Represent-ative Sample	Samples that are identical to the verified product in all material respects. Samples that are known to be representative of the population of products manufactured since the last periodic test (or since the verification for the first periodic test). Samples are comparable to the unselected portion of the children's product population with respect to compliance to the applicable children's product safety rule(s)
Sponsor	An organization under whose authority a verification program is developed, promulgated, and financed, and with whose name the verification program is identified; the sponsor may delegate the operation and administration of a verification program to another party called the Administrator.
Supporting Laboratory	Independent testing and inspection agency designated by the program sponsor, Baby Safety Alliance. Tests performed by these laboratories must be transferred to the Program Administrator.
Third Party Testing Organization	A testing inspection agency other than one controlled by a producer(s)/vendor(s).
Validation	The process by which a separate determination is made by a third party that verification by the producer or vendor is, in fact, in accordance with the program requirements.

Validator	A third-party organization that conducts the act of validation and is other than the producer or vendor or buyer.
Valid Date Code	A date code on the product indicating a date of manufacture after the date that Baby Safety Alliance approves the Application and Agreement for the applicable Verification Program.
Verification	The procedure by which a product or service becomes verified.
Verification Seal	An affixation to or marking on a product, or service document, on the package or container thereof, which includes a verification mark or symbol and other information required by or permissible under the program. It may consist of one or more seals, markings or nameplates.
Verified	Attested by the producer or vendor under the procedures of Verification Program as satisfying the BSA protocol requirements of the referenced standard(s) or specification(s).
Verifier	The producer or vendor who verified that the product(s) or service(s) meets the requirements of the referenced standard(s) or specification(s).

The following definitions are taken from the Baby Safety Alliance/Manufacturers Application and Agreement:

1.4 **Program:**

The term “Program” refers to the Baby Safety Alliance Verification Program, which provides for the verification of a participant by a laboratory, as being capable of testing their product to confirm compliance to the standard(s) and only distributing product models that comply with the standard(s).

1.6 **Standard:**

The term “Standard” refers to the Standard Consumer Safety Specification, for the specific juvenile product, issued by ASTM International, any applicable Federal requirement(s) and Baby Safety Alliance protocols.

SECTION 2 – PROGRAM ROLES

2.1 Program Sponsor

The Baby Safety Alliance is the sponsor of the program. On matters pertaining to participation, Manufacturers Agreements, purchase of seals, etc. manufacturers shall communicate with the Administrator of the Baby Safety Alliance Verification Program:

Lisa Trofe, CAE
Executive Director
Baby Safety Alliance
1120 Route 73, Suite 200
Mt. Laurel, NJ 08054
(856) 380-6896
info@babysafetyalliance.org

2.2 Independent Testing Laboratory/Validator

Bureau Veritas (hereinafter referred to as "Laboratory", "Principal Laboratory" and/or "Program Administrator") is at present designated as the program's Principal Independent Testing and Inspection Agency and Program Administrator. On matters pertaining to initial verification, scheduling of field tests, sample collection, verification of modification model, communication is directed to:

Robert Moss
Bureau Veritas
100 Northpointe Parkway
Buffalo, NY 14228
704-989-4443
robert.moss@bureauveritas.com

Intertek and SGS (hereinafter referred to as "Laboratory" or "Supporting Laboratory") are, at present, designated as the program's approved Supporting Independent Testing and Inspection Agencies. On matters pertaining to initial verification, scheduling of field tests, sample collection, verification of modification models, etc., communications are directed to:

Amy Turner
Intertek Test Lab (ITS)
545 East Algonquin Road, Suite F
Arlington Heights, IL. 60005
214-970-8663
amy.turner@intertek.com

Scott Nesson
SGS North America
291 Fairfield Avenue
Fairfield, NJ 07004
201-247-9337
scott.nesson@sgs.com

You must choose which laboratory you want to work with for Verification Program testing. The principal role of the Laboratory is to validate the manufacturer's verification.

You can choose to have testing done at one of the labs' overseas locations. Please contact their U.S. location for information.

Testing completed by Intertek or SGS must be transferred to the Program Administrator (Bureau Veritas). Testing completed by CPSC Accredited laboratories (see Section 4.7) must also be transferred to the Program Administrator.

2.3 Participants

Any manufacturer or importer (hereinafter referred to as the "Manufacturer"), whether or not a Baby Safety Alliance member, may participate in the program in accordance with the terms and conditions set forth in the Application and Agreement and the Procedural Guide. Application for participation in the program must be sent to the Baby Safety Alliance. (see Paragraph 2.1).

2.4 Baby Safety Alliance Verification Committee

The Baby Safety Alliance Verification Committee has complete responsibility for the development, modification and technical guidance of the program in order to ensure uniformity, equity, and continuity.

SECTION 3 – PROGRAM DOCUMENTS

3.1.1 Application and Agreement

The application and agreement must be completed in advance of requesting testing. The application and agreement are online forms located under the Verification Program menu of www.BabySafetyAlliance.org.

3.2 Laboratory Service Agreement

The agreement between Baby Safety Alliance and the Laboratory sets forth the responsibility of the Laboratory to assure that the Participant's products comply with the requirements of the verification Protocols and for the laboratory to perform the tests and inspections as stipulated in the Procedural Guide (Paragraph 3.3).

3.3 Procedural Guide

The Procedural Guide is prepared by Baby Safety Alliance, approved by the Baby Safety Alliance Verification Committee and distributed by Baby Safety Alliance. It is the intent that this guide will outline and amplify the provisions of the Participant's and Laboratory Service Agreements for the guidance of those concerned with the operation of the program.

3.4 Directory of Verified Baby Safety Alliance Verification Program Participants (per category)

Baby Safety Alliance will prepare and publish online a directory listing of all verified participants. Notification of the Directory will be distributed by Baby Safety Alliance in a manner and at a cost that allows all interested parties to have access to it.

Directory listing of ALL participants in the Baby Safety Alliance verification program is MANDATORY.

SECTION 4 – OUTLINE OF TESTING PROCEDURE

After the participant has completed the Application and Agreement (See Paragraph 3.1), the following steps must be completed **before** Baby Safety Alliance approves the Application and Agreement. Upon successful completion of the following steps and based on notification by the Laboratory, Baby Safety Alliance will issue an approval signifying the participant is verified for the product category listed.

4.1 Model Families

4.1.1 Basic Models

All basic models must be tested in accordance with Section 4.2 and 4.3.
A complete model list (Form A) must be submitted to Baby Safety Alliance.

The model list and pictures of all modification models must be updated in the Program Administrators electronic system as new base or modification models are added. At a minimum a program participant must update the model list each calendar year.

4.1.2 Modification Models

The Participant shall document similarities in models to justify that certain tests need not be repeated for each model number. If the modification, in the judgment of the Laboratory and based on the CPSC definition of a material change in the product's design or manufacturing process, requires additional tests to determine compliance with specific requirements of the Standards, these individual tests shall be conducted by the laboratory or the Participant may refer a dispute to the Baby Safety Alliance Verification Committee for resolution.

A modification model shall be structurally identical to the basic model such that any differences must not affect the model's compliance with the performance requirements of the standard.

4.1.3 Sample Identification

4.1.3.1 Ongoing Test Samples

Regardless of whether the samples are selected by the Participant or selected by the Laboratory, provision for identifying the samples selected for testing is required.

4.1.3.2 Initial Test Samples

For the initial verification selection of a model by the Participant, the manner and means, at the option of the Participant, of identifying the design of the sample tested shall be 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.). This

information shall be retained on file at the Participant's factory for twelve months and shall be made available to the Laboratory upon request.

4.1.3.3 Documentation by Component Parts

Program Participants choosing to pursue component part testing as part of the verification testing must provide all of the information indicated in section 4.9 and a Letter of Verification from the participant or from a third party in either hard copy or electronically to assert compliance to the specific sections of the applicable standards and regulations under the Baby Safety Alliance program. The letter must attest to compliance to all the provisions of 16 CFR 1109 federal regulation for component part testing.

4.1.4 Representative Sample

If a manufacturer chooses to follow the procedures outlined in Section 4.2., they must provide a "representative sample". Program Participants can refer to the Baby Safety Alliance Verification Program Definitions to ensure they are meeting the requirements of a representative sample. 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.

4.2 Initial Verification

Baby Safety Alliance notifies the Laboratory that the Participant has signed the Application and Agreement (See Paragraph 3.1) The Participant will send Form A (model listing attached in excel format) to Baby Safety Alliance. The participant will send form C (Test Request Form) to the laboratory as chosen by the program participant.

The applicant must make arrangements with the appointed laboratory for product testing. All products submitted for testing to the laboratory are at the participant's expense. The Laboratory shall notify Baby Safety Alliance once the following steps are successfully completed or the participant elects to discontinue the process to become certified.

After Initial Verification, participants are required to test and verify the compliance of all subsequent new models prior to shipment.

Participants can choose from the following options to submit sample(s) for Initial Verification

4.2.1 Samples selected from representative lot by Program Participant

Baby Safety Alliance notifies the lab that the Program Participant has chosen to select and submit their representative sample(s) to the laboratory. The sample quantity will be determined between the participant and the laboratory. The Program Participant must provide Verification indicating

that the sample selected is representative of their production. The Laboratory will test in accordance with the appropriate Baby Safety Alliance protocol requirements.

4.2.2 Product Failure

All failures identified in testing shall be addressed per Section 6.

4.2.3 Test Results

Initial Verification test results are valid for a maximum of 12 months. Test results from Baby Safety Alliance Supporting labs (SGS & ITS) must be transferred to the Program Administrator (BV) to fulfill the requirements of the program. The manufacturer must ensure that the Supporting lab has transferred test results to the Program Administrator to fulfill the requirements of the program.

4.3 Annual Testing

The Participant will test one basic model and/or modification model for each family annually with either the Principal Laboratory, Supporting Laboratories, or if applicable, CPSC Accredited Laboratory (see Section 4.8). The samples(s) selected must be in accordance with the sampling options described in 4.2.1, 4.2.2 or 4.2.3. The chosen sample selection option must be communicated to Baby Safety Alliance and the chosen laboratory. The Program Participant must provide Verification indicating that the sample(s) selected is representative of their production. The sample quantity for each family will be determined between the participant and the Laboratory

The attributes that are shared by all models in the family can be tested by one base or modification model in that family. Any attributes that are particular to specific models within the family must be tested additionally on an individual basis.

4.3.1 Product Failure

All failures identified in testing shall be addressed per Section 6.

4.3.2 Test Results

The annual test must be conducted on or before the end of the 12-month period following the date of the prior annual test. Test results from the Baby Safety Alliance Supporting Laboratories (SGS & ITS) or CPSC Accredited laboratories must be transferred to the Program Administrator (BV) to fulfill the requirements of the program. The manufacturer must ensure that the Supporting laboratories or CPSC Accredited Laboratories have transferred test results to the Program Administrator to fulfill the requirements of the program.

4.4 Product Changes

The participant shall retest a sample of a model whenever a material change has been made to the product.

A material change to the product, as defined by the CPSIA, can be any change that could affect a product's ability to conform to a product safety rule, including a product design change, a change in the manufacturing process, or a change in the supplier of a component part. When testing because a material change has occurred, manufacturers should only need to assess the product's conformity with the requirements that might have been impacted by the change.

4.5 Selection of Test Standards

The participant shall be responsible for the selection of the Test Standard to be used for the evaluation and testing of the submitted product. In the event that a question arises as to the appropriate Standard to apply to the submitted product, the Laboratory may propose the use of a different Standard. If the Participant objects to the proposal from the Laboratory, then the Laboratory shall inform Baby Safety Alliance that an interpretation on the application of the Standard(s) will be requested from the relevant Standard Development Organization via ASTM. At that time, the ASTM will add the interpretation request to the agenda for the next meeting of the appropriate committee. The laboratory shall be responsible for maintaining documentation of the interpretation received. The Laboratory shall inform the Participant of the result of the inquiry so that the Participant may elect whether to proceed. The Laboratory shall also notify Baby Safety Alliance of the Standard selection issue prior to proceeding with evaluation and testing of the submitted product.

4.7 Alternate Accredited Test Facilities

The program only allows use of the Baby Safety Alliance principal and supporting laboratories unless otherwise noted for sections 4.2 and 4.3 except for Component part testing as described in section 4.9. Component part testing can be allowed from other CPSC accredited laboratories, but that data must be accepted by the Baby Safety Alliance Program Administrator or supporting laboratories in confirming verification or acceptable annual testing. Where the CPSC has not identified accredited laboratories for specific tests in question, the participant shall be required to use the Principal or Supporting Laboratory until such time that accreditation is granted to alternative laboratories.

4.8 Transfer of Test Results

Participants are allowed to transfer physical, chemical and flammability test results from previously tested product/component/material to satisfy the requirements of *4.2 Initial Verification* and *4.3 Annual Testing* of the Baby Safety Alliance program if the following conditions are met.

4.8.1 Results can be transferred as long as the testing was done at the Principal or Supporting Laboratory. Results can be transferred from any other laboratory as outlined in 4.8.4 to fulfill the requirements for Initial Verification & Annual Testing.

4.8.2 The product/component/material represented in the test report is identical to the product/component/material being considered in all material respects that are pertinent to the specific citation being transferred.

4.8.2.1 Physical (non-ASTM), chemical/analytical and flammability testing transfers require that the physical, chemical/analytical or flammability attributes of the product/component/material represented in the test report be equivalent to those of the product/component/material under consideration. These attributes must be identical in construction, or material and constitution or any other physical or chemical characteristics which may have a bearing on the test outcome or determination of whether or not the product/component/material complies with the citation.

4.8.2.2 ASTM physical and mechanical testing is not transferrable unless performed by the Principal or Supporting Laboratories and transferred to the Program Administrator. This excludes modification models that meet the requirements of 4.1.2.

4.8.3 The sample collection process for the product/component/material represented in the test report shall have been a representative sample and thus equivalent to the process outlined in section 4.2 of the Baby Safety Alliance Procedural Guide.

4.8.4 The verifying test laboratories issuing the test report under consideration must have been accredited by the CPSC for the citations under consideration at the time of the report issuance. This is only applicable to those citations that have mandatory federal requirements for which accreditations exist. Where no Federal requirement exists, only the Baby Safety Alliance Principal or Supporting laboratories can perform testing and the test laboratories shall have employed the same or more severe test methods to those required by the citation in determining compliance to the citation.

4.8.5 All referencing test reports must meet the following criteria

4.8.5.1 If the test report is older than 6 months the program participant must supply a Letter of Guarantee claiming equivalence of the product/component/material. No report referencing testing older than 12 months from the date of manufacture is valid.

4.8.5.2 The reference report shall indicate appropriate identification, model number, part or reference number or product description.

4.8.5.3 The reference report shall include a photo of the product/component/material that was tested.

4.8.6 Participants choosing to pursue the transfer of test results must provide the validating test laboratory, in either hard copy or electronically, the following information to assert compliance to section.

4.8 Transfer of Test Results of the Baby Safety Alliance program:

- The reference test report
- A Letter of Guarantee claiming equivalence of the product
- A completed test request indicating request for transfer

4.8.7 The Baby Safety Alliance test laboratory validator has the authority and responsibility to review the conditions of the request to determine if the aforementioned requirements under 4.8 are met.

4.9 Component Part Testing

Participants may employ component part testing to meet, in whole or in part, the requirements of *4.2 Initial Verification* and *4.3 Annual Testing* if the following conditions are met.

4.9.1 Testing of the component part is sufficient to assess compliance, in whole or in part, of the finished product with the applicable citation.

4.9.2 Finished product certificates may be based on any combination of:

- Component Part Testing
- Component Part Verification
- Finished Product Testing
- Finished Product Verification

4.9.3 The component part represented in the test report is identical to the finished product/component/material being considered in all material respects that are pertinent to the specific citation being transferred.

4.9.3.1 Physical component part testing requires that the physical attributes of the component be equivalent to those of the finished product component under consideration. These attributes must be identical in construction or any other physical characteristics which may have a bearing on the test outcome in determining whether or not the finished product component complies with the citation.

4.9.3.2 Chemical/Analytical component part testing requires that the chemical attributes of the component be equivalent to those of the finished product component under consideration. These attributes must be identical in material and constitution or other chemical characteristics which may have a bearing on the test outcome in determining whether or not the finished product component complies with the citation.

4.9.3.3 Flammability component part testing requires that the flammability attributes of the component be equivalent to those of the finished product component under consideration. These attributes must be identical in material and constitution or other chemical characteristics which may have a bearing on the test outcome in determining whether or not the finished product component complies with the citation.

4.9.4 A BOM along with an identification of component part tested, an identification of a lot, batch number or production interval for which the testing applies, and the referencing test report must be provided to the laboratory and meet the following criteria:

4.9.4.1 If the test report is older than 6 months the program participant must supply a Letter of Guarantee claiming equivalence of the product/component/material. No report referencing testing older than 12 months from the date of manufacturer is valid. Exception: If the model number and/or date code and batch number on the test report are exactly the same as the submitted product/component/material, or the test report represents the latest inventory of the component. i.e. – new inventory has not been purchased since the last test report.

4.9.5 Participants choosing to pursue component part testing must provide a Letter of Guarantee to the validating test party in either hard copy or electronically to assert compliance to section *4.9 Component Part Testing* of the Baby Safety Alliance Verification program. The letter must also attest to compliance with all the provisions of 16 CFR 1109.

4.9.6 Participants choosing to transfer component part test results from a previously issued test report to meet, in whole or in part, the requirements of *4.2 Initial Verification* and *4.3 Annual Testing* must comply with the requirements in *4.8 Transfer of Test Results.*

4.10 Disposition of Test Samples

Participants have two options for disposing of samples
A) Having the Laboratory dispose of the samples after a 30-day period
or
B) Having the Laboratory ship the samples back to the Participant at the Participant's expense, unless the Laboratory has reason to retain the sample(s)

NOTE: Failures will be retained by the Laboratory for one year. Test failures will be made available to the manufacturer to view but will be retained by the Laboratory. After one year, the disposition of the sample will revert to option A or B above.

SECTION 5 – USE OF SEALS

5.1 Notification of Compliance

After Initial Verification by the Laboratory, Baby Safety Alliance and the Participant shall be notified by the laboratory of the Participant's compliance with the Standard.

5.2 Upon receipt of a certificate (letter) of approval from the Laboratory that a Participant's products have been approved, the Participant will receive from Baby Safety Alliance the artwork for the Baby Safety Alliance Verification Seal to allow the Participant to identify certified models. Identification may be by means of hang tags, labels, or point of sale material on the product;

identification may also include the seal in carton graphics and in advertising for verified models. Please refer to the Verification Seal Style Guide for additional information.

SECTION 6 – NON-COMPLIANCE

No Participant shall be listed in, or withdrawn from, the Directory of Verification Participants by the Laboratory unless the Administrator and Participant have received respectively a Notice of Verification or Notice of Non-Compliance from the Laboratory.

6.1 Determination of Compliance

The Laboratory is the sole judge of the compliance of Participant's product(s) with the Standard for the purpose of initial testing, annual testing and challenge testing.

6.1.2 If during any testing, a failure occurs, the Participant and the Laboratory shall follow the guidelines in sections 6.2. or 6.3.

6.2 Initial Verification Testing

If a test failure occurs during initial testing, it is the responsibility of the Laboratory to notify the Participant of the Non-Compliance immediately.

6.2.1 Laboratory issues Fail Report to Program Participant.

6.2.2 Program Participant verify failure or challenge the test based on test results.

6.2.3 If failure is valid, the participant must re-submit product for complete testing or at a minimum submit for a partial test with documentation of what is to be tested based on the previous test failure. (e.g. Labeling)

6.2.4 The Program Participant must re-submit for Initial Verification

If the participant believes the test conducted by the Laboratory is invalid, the participant has the option of having the physical test redone without corrective action. If the retest results in a pass, the previous test is invalidated. If the retest results in another failure, the failure is substantiated, and participant must re-submit a new sample for Initial Verification.

6.3 Annual Testing

If a test failure occurs during annual testing or challenge testing at the Laboratory, the following procedure is to be adhered to.

6.3.1 The Laboratory issues a Non-compliance Report identifying the source of the failure to comply and JCAR to the Program Participants / factory.

6.3.2 The Program Participant / factory verify failure or review testing to challenge the *JCAR*

6.3.3 If a failure is confirmed, the Program Participant / factory quarantines the product and implements the appropriate remedy.

6.3.4 The JCAR process is implemented

6.4 <u>Notice of Non-compliance</u>

Upon receipt of a notice of Non-Compliance and JCAR, it is the responsibility of the Participant to contact the Laboratory within fourteen (14) working days of the receipt of the notice to establish terms for resolution of the JCAR. The Participant shall exercise one of the following options:

6.4.1 Appeal to the Manager of the Laboratory's Product Verification Division, stating the reasons why the Laboratory should retest the model.

6.4.2 Submit an action plan to the Laboratory for approval to correct the Non-Compliance. The Participant will have up to 60 days to resolve the problem and submit a written report to the Laboratory to close the JCAR.

6.4.3 Discontinue participation in the Program. Baby Safety Alliance will remove the Participant from the list of Verified Manufacturers.

6.5 If the JCAR is not resolved with the Laboratory and/or Baby Safety Alliance within 60 days from initial receipt of the JCAR, the Participant will be notified that the participant will be removed from the program and all Verification seals must be removed from all non-compliant inventories unless Baby Safety Alliance grants an extension.

6.5.1 If a Participant accepts the Notice of Non-Compliance as valid and elects to be deverified by selecting this option it may not be reverified until one year (12 months) from the date of deverification.

6.6 <u>Challenge Procedure</u>

Any Program Participant in attempting to overturn a claim of non-compliance for that participant's product must submit supporting data concerning the claim against a Participant's model to the

Baby Safety Alliance Administrator. The Baby Safety Alliance Administrator shall submit such data to the Laboratory for determination of validity.

6.6.1 If the claim of non-compliance is substantiated by the Laboratory, the noncomplying Participant shall be notified and required to choose one of the three (3) options described in Section 6.4.

6.6.1.1 The Participant, in this situation shall reimburse the Baby Safety Alliance Administrator and/or the Laboratory for all test costs and other expenses which may have been incurred in responding to the challenge.

6.6.2 If the claim of non-compliance is not substantiated by the Laboratory, then the challenger initiating the claim shall reimburse the Baby Safety Alliance Administrator and/or the Laboratory for all test costs and other expenses which may have been incurred incident to the complaint.

6.6.2.1 Under these circumstances, the Administrator shall notify the alleged non-conforming Participant in writing that the claim has not been substantiated.

SECTION 7 – CONFIDENTIALITY

Participation in this program involves disclosure of certain confidential information to Baby Safety Alliance and/or the Laboratory. All information shall be handled as listed below:

1. Baby Safety Alliance and/or Laboratory may be exposed to information or gain knowledge as a result of being involved with a Participant that otherwise would be known only to employees of the company. It is incumbent on all Baby Safety Alliance and/or Laboratory personnel to be sensitive to confidential information and hold such knowledge in confidence.

2. All test results generated by the Laboratory and those submitted by the Participant shall be considered confidential.

3. During Optional In-plant Validation Testing, the Laboratory must be allowed access to test facilities and areas of the Participant's premises necessary to determine compliance with the Standard. The Laboratory shall maintain all information, procedures, manufacturing processes, test equipment, etc. in strictest confidence since they may be considered proprietary or a source of competitive advantage.

4. Any notice of non-compliance shall be confidential between Baby Safety Alliance, the Laboratory, and the Participant except in the case of a challenge procedure where the originator of the

challenge will be notified of the results (compliance or non-compliance). However, when a Participant is delisted, this will be evidenced in the Directory on the Baby Safety Alliance Website.

SECTION 8 – FINANCING and FEE SCHEDULES

The Baby Safety Alliance Verification Program will be partially financed by a yearly participation fee paid by the Participants directly to the Baby Safety Alliance. The following fee schedule, which may be amended annually, is applicable to participation in the Baby Safety Alliance Verification Program.

Yearly Participation Fee

1. Baby Safety Alliance Members $4,578
2. Non-members $10,080

A. *Testing Fees*

The Laboratory will charge a flat rate fee per product category (with a discounted price for JPMA members). Please see current **Baby Safety Alliance Verification Program Test Prices** for Baby Safety Alliance Protocol and ASTM/SOR/FDA test prices from Bureau Veritas (BV), Intertek (ITS) and SGS.

B. *Inspection/Witness Testing at the Manufacturer's Plant or Distribution Facility*

Participants interested in conducting audits on their internal facilities have the option to utilize Baby Safety Alliance discounted services to do so.

Appendix of Changes
12/17/2025 Updated the yearly participations fees for 2025.
10/21/2024 Updated the yearly participations fees for 2025.
02/14/2024 Replaced Ken Walsh's contact information with Robbie Moss
11/20/2023 Updated the yearly participation fees for 2024.
9/11/2023—Updated contact information for ITS. Removed Clauses 4.2.1 and 4.2.2. Removed JPMA Corrective Action Request (Form B).

6/28/2023—Replaced Megan Bunn's contact information with Lauran Swearington and updated the yearly participation fees.
6/26/2020 – Added definitions for annual certification, initial certification, and pre-testing. Replaced "pre-market" with "initial". Eliminate and/or replaced "production surveillance" with "annual".
7/10/2019 – Updated Administrator Lab information, removed references to withdrawn standard E1906-99 and other editorial changes.
11/21/2018 – Updated prices to 2019 rates.
10/11/2018 – Updated Form B. Corrected various typos. Updated "Changing Tables" to "Baby Changing Products" per ASTM updates.
*08/14/2018 – Added Baby Monitors (F2951) and Infant Floor Seats (F3317)
06/14/2018 – Updated prices to 2018 rates. Updated Form A. Updated contact information for BV. Corrected various typos.

01/02/2017 – Updated prices to 2017 rates.
02/10/2016 – Updated prices to 2016 rates. Updated TRF.
09/30/2015 – Updated contact information.
12/11/2014 – Updated pricing for 2015. Updated TRF.
10/22/2014 – Added Rockers (F3084). Updated contact information for BV.
3/19/2014 – Updated contact information for ITS. Corrected typo in 4.8.2.2, which named an incorrect appendix.
1/08/2014 – Updated JPMA staff and laboratory contact information, due to personnel changes. Deleted reference to product surveillance fees ($25 to review model lists) as it has never been charged.
10/24/2013 – Updated contact information for accuracy, and corrected a typo in 4.8.6, which referred to appendices.
8/29/2013 – Updated link to model list template.
2/21/2013 – Clarified language in section 4.5 – Selection of Test Standards