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| Product Responsibility Best Practices | SUBJECT Distributor-Supplier Communication | LAST UPDATE July 2018 |
| | APPLIES TO • Suppliers • Distributors | FOCUS ON Supplier-distributor communication that fosters product responsibility and compliance in the promotional products supply chain |
| | QUICK LINKS • PPAI Corporate Responsibility: http://ppai.org/corporate-responsibility • UL: industries.ul.com/premiums-promotional-and-licensed-goods • Consumer Product Safety Commission: www.cpsc.gov | |

Intended for beginner compliance programs

Italic grey text indicates a hyperlink listed in the Online Resources section of this document.

As members of the supply chain, distributors and suppliers are responsible for putting only safe and compliant products in the market. Distributors must protect their customer’s brand as if it were their own. Suppliers must ensure compliance with all regulations and oversee all factories. Both parties must work as partners to ensure only safe product is introduced to the market.

Distributors: Ask Your End Buyer

Get a handle on who will receive, who will or may use the products, and where geographically the products will be given out.

- **Product Recipients.** To whom will these products be given? Will children be recipients?
- **Where Distributed.** Where will the products be distributed? Some states maintain product safety standards and require testing that is in addition to federal statutes.
- **Imprint.** What kind of logo do you intend to use? General-use items that are imprinted with logos appealing to children could become children’s products because of that design.
- **Single Event or Multi-Use.** Will the items be all used at one time, or will some/all be kept in stock for future events? If the items are used over time, some may be given to children, which could prompt the need for additional testing to children’s product standards.

Distributors: Tell The Supplier

Children As Recipients. Based on conversations with your end buyer, tell your supplier if the products will be given to children at

a given event or might be given to children based on their being kept and used over time.

Thinking Beyond The Regs. The product might be a “general use” (non-children’s) item, but if you know from your conversation with the end buyer that the product is being distributed to children, let your supplier know. **General-use items distributed to children do not necessarily need to comply with CPSIA regulations**, BUT that type of conversational transparency is important for the supplier, distributor and salesperson.

Distributors: Ask The Supplier

- **Children’s Product.**
Does the supplier consider the item to be a children’s product? Why or why not?
- **Applicable Regs.**
What regulations apply?
- **Compliance With Regs**
 - Does the product comply with all applicable regulatory requirements?
 - How has compliance been determined?
 - Request a copy of all related test reports.
 - Request a copy of the General Conformity Certificate (GCC) or Children’s Product Certificate (CPC).
 - Was all product made at the same factory?



- Was all product made from the same lot of materials?
- Will the modifications (e.g. imprint inks) you plan to make to the product affect the product's compliance?

- **Tracking Labels.** If a children's product, will there be a tracking label? What does the tracking label information mean?

Suppliers: Be Prepared To Provide

With the most in-depth knowledge of the product, suppliers should be prepared to provide all product safety information.

Suppliers should be prepared to provide:

- Answers to the above questions
- Copies of *GCCs* or *CPCs* and test reports
- Explanation of tracking label existence or exclusion

Purchase Order Best Practice

Create fields on all purchase orders that require answers to the following questions:

- Is this a children's product?
- Will children be recipients of this product?

If the answer to both of these questions is yes, it is important to note clearly on P.O.s:

This product is intended for distribution to children. It must comply with all applicable federal and state regulations.

When A Distributor Is A Manufacturer

Importing. Under federal law, an importer is considered to be a manufacturer; therefore, a distributor who sources direct is a manufacturer. In such a case, the distributor takes on all the testing and labeling responsibilities that a supplier normally has.

Apparel Decorating. A distributor who uses a contract decorator (i.e. for imprinting apparel) would also be considered a manufacturer. In this case, the distributor would have the same obligations as the supplier in the eyes of the CPSC.

Final Note

There are distinct regulatory differences between children's products (i.e. intended primarily for use by children 12 years of age and younger) and toys/child care articles. Generally speaking, the testing requirements for toys/childcare articles are more significant.

Online Resources

How To Read Compliance Documents: <http://www.ppai.org/media/1838/pr-guide-how-to-read-compliance-documents.pdf>

PPAI Tool for Distributor-Buyer Communication: <http://www.ppai.org/media/1841/pr-guide-product-safety-communication-for-dist.pdf>

PPAI Code of Conduct: <http://ppai.org/corporate-responsibility/ppai-code-of-conduct>

PPAI Responsible Sourcing FAQs: <http://www.ppai.org/corporate-responsibility/product-responsibility/product-responsibility-faqs/>

Sample Children's Product Certificate (CPC): <https://www.cpsc.gov/Testing-Certification/Childrens-Product-Certificate-CPC>

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