

Client Alert

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CPSC Launches “Regulatory Robot”

By Erin Bosman, Julie Park, and Dean Atyia

Businesses face a daunting task when attempting to comply with the U.S. Consumer Product Safety Commission’s (CPSC) reporting requirements. In an effort to simplify and streamline the process for consumer products providers, CPSC recently launched a “Regulatory Robot” designed “to guide you through . . . identify[ing] important product safety requirements that you should review before manufacturing or importing your consumer product.”

The Regulatory Robot asks a series of questions regarding a user’s product. (<http://www.cpsc.gov/en/Business--Manufacturing/Regulatory-Robot/Safer-Products-Start-Here/>). Throughout the process, the Regulatory Robot provides helpful links that explain, for example, the definition of “consumer product,” which products qualify as “children’s products,” and those categories of items that fall under “household products.” After the user answers questions via the click-through menus, the Regulatory Robot generates a report that identifies consumer product safety requirements applicable to the product in question. This includes citations to applicable federal regulations, as well as further information on and links to CPSC’s own internal guidelines. The report also helps to identify when third-party product testing is necessary and identifies CPSC-approved laboratories to conduct the testing. Finally, the report provides guidance on mandatory and voluntary reporting obligations, as well as basic information about product recalls. Because the purpose of the Regulatory Robot is to aid and guide users, CPSC does not request any identifying information, nor does it retain the final report generated to the user.

The Regulatory Robot marks a significant step forward in CPSC efforts to assist with compliance and reporting burdens. Information regarding CPSC rules and regulations has been publicly available for years in piecemeal fashion, but the Regulatory Robot is the first instance in which the information is consolidated, available in one location, and interactive.

New users, small businesses, and manufacturers of children’s products may find the tool especially helpful. Traditionally, businesses have been able to contact the CPSC’s Small Business Ombudsman or the Office of Compliance and Field Operations to seek guidance on complying with the complex regulatory framework and varied safety requirements. These individual inquiries strained CPSC resources. The Regulatory Robot aims to relieve some of that burden by providing direct guidance to users, even though the Small Business Ombudsman and Office of Compliance and Field Operations will continue to be available for additional questions.

The Regulatory Robot’s generalized reports and guidelines may not resolve all user inquiries, but in most cases, it provides a starting point from which to understand regulatory requirements and reporting obligations. Armed with this knowledge, businesses can identify when to seek further legal advice to develop a comprehensive approach to consumer product safety compliance.

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Contact:

Erin Bosman

(858) 720-5178

ebosman@mofocom

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