



January 15, 2009

To: All Vendors

Fr: Macy's

Re: Consumer Product Safety Improvement Act of 2008 (CPSIA) - General Certification of Conformity (GCC)

Dear Vendor:

The U.S. government passed the Consumer Product Safety Improvement Act (CPSIA) on August 14, 2008 to strengthen federal consumer product safety laws enforced by the U.S. Consumer Product Safety Commission (CPSC). The CPSIA requires the issuance of a General Certification of Conformity (GCC) for every consumer product that is subject to any safety rule, ban, standard, or regulation enforced by the CPSC. The GCC is required for all applicable consumer products manufactured on or after November 12, 2008. CPSC has issued a final rule requiring that all domestic manufacturers and importers provide the GCC. Products without the GCC can be stopped at US Customs, refused entry into the US, and may not be sold or distributed in US commerce.

Macy's expects ALL its Vendors to prepare and, as required by the CPSC, retain for a minimum of three years a GCC for all products sold to Macy's. Vendors must retain and consult with their legal counsel and testing labs for guidance in testing and preparing their GCCs. The following links at the CPSC website provide information about the CPSIA and the GCC requirements:

Main CPSIA Web Page: <http://www.cpsc.gov/about/cpsia/cpsia.html>

CPSC's Sample GCC: <http://www.cpsc.gov/about/cpsia/faq/elecrtfaq.pdf>

CPSIA Laws, Summaries, & FAQs: <http://www.cpsc.gov/about/cpsia/legislation.html>

CPSC Regulated Products Table: <http://www.cpsc.gov/businfo/reg1.html>

Key Points

- Vendor Must Certify Based on a Reasonable Testing Program: For non-children's products, the GCC must be based on a test of the product, or a reasonable testing program.
- Vendor Must Use Accredited Third Party Labs for Children's Products: The Vendor must certify the safety of its children's products by sending such products to Accredited Third Party Labs for testing, as required by CPSIA. See link for CPSC approved labs <http://www.cpsc.gov/cgi-bin/labapplist.aspx>
- Vendor Must Prepare GCCs: Macy's does NOT determine the contents of Vendor GCCs. The Vendor is required to issue a GCC based on passing test reports or the Vendor's internal reasonable testing program. The GCC must identify the product sufficiently such as inclusion of the SKU or other tracking information so that Macy's is able to match the GCC to the products sold at Macy's.
- Vendor Must "Furnish" the GCC to Macy's: The vendor – as a manufacturer and/or importer – is required by law to make its GCCs available to all retailers such as Macy's. If an electronic GCC is used, this requirement is satisfied so long as the vendor provides a reasonable means to access the GCC. See CPSC FAQ on GCCs <http://www.cpsc.gov/about/cpsia/faq/elecfaq.pdf>

Macy's is requiring its vendors to comply with this requirement by (1) providing a website where Macy's may access a GCC, or (2) supplying the GCC to Macy's **within 24 hours of a request**. Each vendor must inform Macy's how the vendor will furnish its GCCs by clicking on the link below.

[General Certification of Conformity \(GCC\) Submission Form](#)