



Date: December 16, 2013  
To: All Vendors  
Fr: Macy's  
Re: Consumer Product Safety Improvement Act of 2008 (CPSIA) – General Certificate of Conformity (GCC) and Children's Product Certificate (CPC)

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 Certificate of Conformity (GCC) for a general use product (i.e., non-children's products) or a Children's Product Certificate (CPC) for a children's product subject to any safety rule, ban, standard, or regulation enforced by the CPSC. The GCC or CPC (hereafter referred to as "GCC/CPC" as applicable to the general use or children's product) became a requirement for all applicable consumer products manufactured on or after November 12, 2008. The CPSIA rule requires that domestic manufacturers or importers provide the GCC/CPC. Products without the GCC/CPC can be stopped at US Customs, refused entry into the US, and may not be sold or distributed in US commerce.

Macy's, Bloomingdale's, and all their affiliates (hereafter referred to as "Macy's") expect ALL of their Vendors to prepare and, as required by the CPSC, retain for a minimum of five years a GCC/CPC 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/CPCs. The following links at [www.CPSC.gov](http://www.CPSC.gov) provide information about the CPSIA and the GCC/CPC requirements:

CPSIA Web Page:

<http://www.cpsc.gov/en/Regulations-Laws--Standards/Statutes/The-Consumer-Product-Safety-Improvement-Act/>

General Certificate of Conformity (GCC) Information at the CPSC website:

<http://www.cpsc.gov/en/Business--Manufacturing/Testing-Certification/General-Certificate-of-Conformity/>

General Business Guidance:

<http://www.cpsc.gov/en/Business--Manufacturing/Business-Education/>

#### *Key Points*

- **Vendor Must Certify Based on a Reasonable Testing Program:** For general use/non-children's products, the GCC must be based on a test of the product or a reasonable testing program.

<http://www.cpsc.gov//PageFiles/132073/desktopguide.pdf>

- **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/labsearch/>

- Vendor Must Prepare GCCs/CPCs: Macy's does NOT determine the contents of the Vendor's GCC/CPCs. The Vendor is required to issue a GCC/CPC based on passing test reports or the Vendor's internal reasonable testing program. The GCC/CPC 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/CPC to the products sold at Macy's.

- Vendor Must "Furnish" the GCC/CPC to Macy's: The vendor - as a manufacturer and/or importer - is required by law to make its GCC/CPC available to all retailers such as Macy's. If an electronic GCC/CPC is used, this requirement is satisfied so long as the vendor provides a reasonable means to access the GCC/CPC. See CPSC FAQ on how manufacturers and importers may furnish GCCs to retailers: <http://www.cpsc.gov/Business--Manufacturing/Testing-Certification/General-Use-Products-Certification-and-Testing/>

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

[General Certificate of Conformity \(GCC\)/Children's Product Certificate \(CPC\) Submission Form](#)

Note for Private Label Vendors: Vendors supplying private label products for Macy's Merchandising Group (MMG) or Bloomingdale's must adhere to any additional requirements mandated by the respective private label program. Contact your MMG or Bloomingdale's private label product manager for additional information.