



Information Kit on Domestic Cot Testing

1. Introduction

The purpose of this information Kit is to provide:

- information about services available from Furntech-AFRDI for demonstrating that children's cots meet legal and general safety requirement based on independent assessment;
- details of the product certification system offered by Furntech-AFRDI in relation to cots;
- an outline of the procedures to be followed in having cots tested by Furntech-AFRDI, including information on payment, timing, freight, expected outcomes, and getting started;
- an outline of the general cost structure for testing of families of cots having mainly common features; and
- a copy of Furntech-AFRDI Testing request pro-forma which indicates the information to be supplied to Furntech-AFRDI with any cot sent for testing.

In this Information Kit the Commonwealth of Australia Consumer Protection Notice Number 6 of 2005 Consumer Product Safety Standard: Children's Household Cots is referred to as the **Consumer Protection Notice** (or CPN) and the Australian New Zealand Standard AS/NZS 2172:2010 *Cots for household use – Safety requirements*, will be referred to as the **Cot Standard** (and AS/NZS 2172:2003 where stated).

2. Assessments

Assessments involve making a series of measurements and undertaking a series of strength, stability and durability tests. These are undertaken at Furntech-AFRDI. Other tests (eg toxicity of coatings) may also be required.

Cot models which are essentially the same – that is vary only in cosmetic ways – may be treated as one model for the purposes of certification. The assessor will make judgements about the degree of similarity after inspecting the models (see section 6).

Prototypes

We are happy to assess prototypes. Assessment is often undertaken to help ensure compliance prior to the expensive stage of tooling up for production.

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However, although we will assess prototypes, we are not prepared to certify them. Prototypes that have been successfully tested will receive a test report only. The report will relate to the compliance of the particular sample that was tested i.e. it will not be a statement of general product endorsement. A certification agreement will only be entered into after an off-tool production sample has been satisfactorily assessed (see section 5).

If you wish to have a prototype assessed please identify the item as a prototype on the Testing Request form attached.

3. Safety requirements for cots

The following notes have been drafted by way of general explanation of the requirements of the Consumer Protection Notice. For specific details readers should refer to the primary document which may be accessed from the following web address: [Cot Mandatory Regulation](#)

In addition to general product safety obligations defined under Section V of the Trade Practices Act of 1974, the minimum safety requirements for cots offered for sale in Australia are more specifically defined in the Consumer Protection Notice which came into effect on 30 November 2005. It is a legal obligation on all persons or organisations offering cots for sale in Australia that the cots meet the safety requirements defined in the Consumer Protection Notice.

While requirements for second-hand cots and antique and collectable cots are also defined in the Consumer Protection Notice these are not referred to further in this Information Kit, although Furntech-AFRDI has the competence to make assessments of these products should the need arise.

The Consumer Protection Notice offered two alternative paths by which the safety of new cots could be demonstrated – Clause (a)(1) and Clause (a)(2). However, access to compliance under Clause (a) (1) ceased to have effect after 1 November, 2006.)

Under Clause (a) (2) of the Consumer Protection Notice compliance with relevant and modified Clauses of AS/NZS 2172:2003 is a minimum requirement.

Because the requirements of the Consumer Protection Notice are a subset of the requirements of AS/NZS 2172:2003 (with Amendment No 1 of 2006), cots which demonstrate full compliance with the Cot Standard (AS/NZS 2172:2003, with Amendment No 1 of 2006) can validly claim compliance with the Consumer Protection Notice.

3.1. Safety Recommendations

In March 2010 the ACCC published a Product Safety Bulletin entitled "Household cots with wooden drop sides". The content of this report can be viewed at <http://www.accc.gov.au/content/index.phtml/itemId/919500>

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A recommendation of the report was that suppliers consider including the following in their risk assessment procedures:

- increasing the force and/or cycle requirements beyond those currently required in Appendices C, D, E and F of AS/NZS 2172:2003 and the mandatory standard (CPN).
- the tests in ASTM 1169 that focus on the strength and integrity of the drop side filler-bar to cross-rail joints.

Please contact us if you wish to discuss and/or include these, or any other additions over and above the base level of the standard or CPN, in your testing programme.

4. Furntech-AFRDI

Furntech-AFRDI is a not for profit organisation (owned by its members) which specialises in testing of furniture for the Australian market.

Furntech-AFRDI is certified by NATA (the National Association of Testing Authorities) as a laboratory with the quality systems, equipment and expertise to test cots to both the Consumer Protection Notice and AS/NZS 2172.

The Institute participates in the development of standards for nursery furniture and has tested more cots to these Standards than anyone else in Australia and New Zealand.

5. Product certification

Furntech-AFRDI offers a product certification system known as Blue Tick under which products which have been successfully tested are accorded certificates which are issued contingent on undertakings by the holders of such certificates that they will maintain the quality of the product and advise of any changes made to the product for the period of validity of the certificate.

Furntech-AFRDI Blue Tick certification is now recognised widely within the furniture industry in Australia as a sign of quality and is frequently required in tender and contract specifications.

Furntech-AFRDI has determined that the minimum requirement for Blue Tick certification for cots is compliance with the Consumer Protection Notice. Full compliance with the requirements of the Cot Standard and the CPN also qualifies a cot for Blue Tick certification.

For further information regarding Furntech-AFRDI Blue Tick product certification refer to our website.

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6. Costs

Because the differences between testing a cot to the Cot Standard and to the Consumer Product Safety standard are small, the difference in costs of testing is minimal, reflecting primarily the cost of toxicity testing of coatings and plastic components should this be required for full testing to the Cot Standard.

The testing price list also recognises that many cot suppliers use variations on a theme to produce different models – the structure, mechanisms and dimensions are the same but the look or construction of the ends may differ.

Where samples of end variations are provided at the same time as the whole cot, the cost – including disassembling and re-assembling the cot with different ends – is much lower. If variations on ends are sent separately, the testing cost would reflect the amount of work involved.

Please contact Furntech-AFRDI for current prices.

For Blue Tick certification an additional fee, plus GST, is payable, subject to member discount. If a supplier wishes to have a cot tested against all the requirements of AS/NZS 2172:2010 additional costs will be incurred if the toxicity analysis of coatings and plastics have to be carried out.

Discounts on testing and certification costs of up to 20 percent are available for Furntech-AFRDI members. Information on Furntech-AFRDI membership is available from the Institute and our website.

A 10% discount is available to members of the Infant and Nursery Products Accreditation and Approval (INPAA). Information on joining INPAA is available from the Director, Tim Wain on 03 9762 7038.

Prices include freight for one sample to and from the laboratory from our depot in each Australian capital city. In the case of variations to a tested product (such as new ends), we need to see the tested cot and the proposed alternative ends and the price covers freight of both.

7. Payment

Furntech-AFRDI policy is that PAYMENT MUST BE MADE BEFORE TESTING COMMENCES. Please phone 03 6326 6155 to request an invoice if this will help to facilitate payment. Facilities are available for payment by Visa and MasterCard.

8. Timing

Because the Standard requires that cots be conditioned in a controlled atmosphere, the testing process takes about two to three weeks for each cot. Assessments are scheduled in order of receipt of the cot complete with the Testing Request form and the relevant fee.

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9. Freight

Refer to the Institute's [Information Kit on Freight to Furntech-AFRDI](#). Distribution of this Kit in hardcopy form will include the freight-related information as a supplementary sheet.

10. What You Get

Assuming that the cot complies, at the end of the process Furntech-AFRDI will:

- issue a Certificate and Test Report; *and*
- mark with paint a sample that has been found to comply and return it to the supplier (this marked sample is in effect part of the certificate of compliance and should be retained should the supplier wish to rely on the assessment in the future).

Non-complying items may be returned if required, at the customer's expense otherwise they will be destroyed.

11. The Starting Point

The starting point for any cot manufacturer or importer who wishes to market cots in Australia is to study the Consumer Protection Notice and the Cot Standard.

Copies of AS/NZS 2172 are available from SAI Global:
<http://www.saiglobal.com/search-publications/>.

In our experience over the last few years, most manufacturers find that the first cot they submit for assessment has a number of problems. The second and subsequent models submitted by a supplier usually have far fewer problems. This suggests that suppliers who think their products comply and who rely on their own assessments may be exposed to prosecution along with their distributors and retailers.

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Testing Request – Cots

Please complete for each product to be tested and fax to (03) 6326 3090 or e-mail to info@furntech.org.au

- * Name of Organisation:
- * Name of Contact (a):
- * Address of Organisation (b):Postcode.....
- * Telephone Number:
- Fax Number:
- Email:
- Website:
- ABN Number
- * Description of Product:
- Model Name/Number (c):
- * Prototype/Production sample (indicate which is applicable)
- * Factory Name (d):
- * Factory Address (d)
- * Standard to be Tested: Consumer Product Safety Standard
- AS/NZS 2172:2010
- Ends/Variations
- Consumer Product Safety Standard or AS/NZS 2172:2003 with variations to Appendices C, D, E and F (see section 3.1)
- Relevant parts of ASTM 1169 (see section 3.1)

Cost of Testing (exc. GST): \$.....

* It is mandatory that information be entered in these fields.

Authorisations

I hereby authorise Furntech-AFRDI or its agents to carry out the tests described above at the agreed price.

Should the product(s) described above be found to comply with the relevant standard, I authorise Furntech-AFRDI to :

(Optional – strike out where permission is not given)

- publicise the fact
- publish a certificate of compliance on the Furntech AFRDI website.

Signature of Authorised Officer

Date

NOTES

- (a) Please insert the name of the person Furntech-AFRDI staff should contact, if necessary, concerning the tests.
- (b) Please insert street address.
- (c) Please print the name and/or number of the product you wish to appear on the test report.
- (d) Please specify the street address and name of the factory in which the product is made.

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