

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 systems 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 2172:2013 *Cots for household use – Safety requirements*, will be referred to as the **Cot Standard**.

There are less (or lower) requirements in the Consumer Protection Notice than in the Cot Standard, therefore cots which demonstrate full compliance with the Cot Standard (AS/NZS 2172:2013) can validly claim compliance with the Consumer Protection Notice.

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 (e.g. toxicity of coatings, timber and plastic components) 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).

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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. However, although we will assess prototypes, we are not prepared to certify them. Prototypes that have been successfully tested will receive a <u>test report only</u>. 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: Consumer Protection Notice.

In addition to general product safety obligations defined under Australian Consumer Law (2012), which supplants the former Trade Practices Act (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 sometimes modified) Clauses of AS/NZS 2172:2003 is the minimum requirement.

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 here.

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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 CPN, in your testing programme.

NB A product tested to the Cot Standard (2013) will not need the above additional testing as these elements have been addressed in the more severe testing incorporated in the 2013 release of AS/NZS 2172.

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 accredited 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 via membership of Standards Australia committee CS-003 – *Safety Requirements for Children's Furniture.*

5. Product certification

Furntech-AFRDI offers two levels of product certification for household cots: Orange Tick Certification, and AFRDI Blue Tick Certification. Cots which have been successfully tested to the Cot CPN are accorded Orange Tick certification; cots that have been successfully tested to the more rigorous requirements of AS/NZS 2172:2013 are accorded AFRDI Blue Tick certification. Both product certifications are issued contingent on undertakings by the holders of such certificates that they will maintain the quality of the product to that which was tested, and advise AFRDI of any changes made to the product during the period of validity of the certificate.

Both AFRDI Blue Tick, and Orange Tick certifications are recognised widely within the Australian, and New Zealand furniture industries as a sign of quality and are frequently required in tender and contract specifications.

For further information regarding AFRDI certification refer to our Website.

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6. Costs

The differences between testing a cot to the Cot Standard and to the Consumer Product Safety standard reflect:

- the cost of toxicity testing of coatings and plastic components should this be required when testing to the Cot Standard.
- the cost of additional strength and durability testing required when testing to the Cot Standard.
- the cost of additional mattress testing required when a mattress is supplied with a cot tested to the Cot Standard.

Note: AS/NZS 2172:2013 has the option of testing a mattress supplied with the cot to AS/NZS 8811.1:2013 - *Sleep surfaces - Test for firmness*. We can also test mattresses and other sleep surfaces to AS/NZS 8811.1 in their own right.

The testing prices 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 than if tested separately. 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 either AFRDI Blue Tick, or Orange Tick certification an additional fee, plus GST, is payable, and is subject to member discount.

Discounts on testing (excluding toxicity) 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).

7. Payment

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

8. Timing

Because the Cot CPN and the Cot Standard require the cot test sample to be conditioned in a controlled atmosphere prior to testing, 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 <u>Information Kit on Freight to Furntech-AFRDI</u>. 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 and that your company has entered into a certification agreement, at the end of the process Furntech-AFRDI will:

- issue a Certificate and Test Report; and
- add the cot to our website list of certified cots.

Non-complying items will 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. To understand the Cot CPN you will need two documents:

- The Cot Consumer Protection Notice; and
- AS/NZS 2172:2003, which is a superseded version of the current Cot Standard, (Note: the Cot CPN references an older, superseded version of the Cot Standard).

If you are seeking AFRDI Blue Tick certification for your cot then you will need a copy of the current Cot Standard AS/NZS 2172:2013, which is available here from SAI Global.

In our experience over many 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.

We also offer a service where we assess technical diagrams/drawings of a cot prior to testing. We cannot state whether a cot will comply from a diagram assessment alone, but it can help identify obvious dimensional failures that you can rectify prior to sending us the test sample. With this type of assessment the more dimensions detailed in the technical diagrams/drawings the better. There is a cost for this service, but the diagram/drawing assessment cost is deducted from the subsequent testing cost if you decide to proceed with testing of the same cot.

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Testing Request - Cots

Please complete for each model to be tested and <a href="mailto:emailt

		contact during testing?)
		D/CODE.
		P/CODE:
		ABN:
		OUNTRY:P/CODE:
	C	
COT TYPE:		
		Cot has a drop side.
TESTING REQUIRED:		Consumer Product Safety Standard;
		AS/NZS 2172:2013; or
	Ц	Consumer Product Safety Standard including additional testing indicated in section 3.1
ADDITIONAL TESTING:		Mattress testing to AS/NZS 8811; and/or
	ч	Testing of additional Ends/Variations required
MODEL NAME/NUMBER: (PRINT the name you wish to appear on the certificate) PROTOTYPE* PRODUCTION SAMPLE		
*NOTE: A certificate <u>will not be issued</u> for a prototype, and it therefore will not appear on the Furntech-AFRDI Webpage. After prototype testing, a further <i>production sample</i> will need to be submitted for full testing at an <u>additional cost</u> before the product is certified.		
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I warrant and declare th		thorisations and Declaration ne information provided is accurate in every detail.
		its agents to carry out tests at the quoted price.
Signature of authorised officer:		
Name: (PRINT)		Date:
Test sample(s) will \underline{not} normally be returned. If you do want them returned, please indicate here (note extra freight charges will apply): YES \Box		
Any significant issues pen YES (if yes, ple		(impending with product (e.g. field failures, claims, recalls)? attach summary) NO \Box
OPTIONAL: Should the product(s) described above be certified by Furntech-AFRDI, I		
authorise Furntech-AFRDI to list the compliance certificate on its website.		
YES 🗖		ио □

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