



## **CPSIA Compliance Screen-Printed Youth Garments Periodic Testing Policy**

*Periodic testing*, as required under 16 CFR 1107.21, Periodic Testing, is required for manufacturing operations that continuously produce their products. Continuous production has been defined as a flow production method used to manufacture, produce, or process materials without interruption. Continuous production is a continuous process or a continuous flow process because the materials being processed are continuously in motion, undergoing chemical reactions, or subjected to mechanical or heat treatment. These processes operate 24 hours per day, seven days per week with infrequent (semi-annual or annual) maintenance shutdowns.

Conversely, batch manufacturing is the process by which components or goods are produced in groups—batches—and not in a continuous stream. During batch manufacturing, the production line is stopped and restarted for each new product, the key differentiating factor between continuous—or line—production and batch production. Based on CPSC staff presentations, the requirement to conduct and implement a periodic testing program is not required for facilities engaged in batch manufacturing operations. The Image Group produces screen-printed T-shirts and sweatshirts internally using a batch manufacturing process.

To maintain compliance with the applicable safety standards imposed on children's products by the Consumer Product Safety Commission, The Image Group has implemented the following policies for internally screen-printed T-shirts, hooded sweatshirts, and infant bodysuits intended for distribution to children twelve years old or younger:

- All testing of component parts will be completed by independent CPSC accredited laboratories.
- Screen-printed T-shirts must be G500B Gildan Youth 5.3 Ounce Heavy Cotton T-Shirts from Broder Bros., Co., a style which The Image Group has had independently tested.
- Screen-printed hooded sweatshirts must be G185B Gildan Youth 8 oz. Heavy Blend 50/50 Fleece Hoods from Broder Bros., Co., a style which The Image Group has had independently tested.
- Screen-printed infant bodysuits must be 4400 Rabbit Skins Infants' 5 oz. Baby Rib Lap Shoulder Bodysuits from Broder Bros., Co., a style which The Image Group has had independently tested.
- Imprint colors must be one of six independently tested inks. The acceptable inks/colors are as follows:

63 ECO White  
Epic National Red 43000FX  
Wilflex 60000FX Epic Navy  
68 Mix Black  
7406 Gold 68 PMS  
X01B 202 Gold

- Tracking labeling will be added to the imprint design, and include information leading readers to online data about the screen-printing production of the garment. The label format will be **TheImageGroupCPSIA.net O99999**, where O99999 represents the sales order number for the batch job.
- Any order requiring a different shirt style or ink must either have additional testing performed or be obtained from a CPSIA compliant vendor that provides proof of testing and all required tracking labeling.
- Implementation and adherence to The Image Group's Material Change Policy.