

SG Mark Marking Procedure (General Information)



Consumer Product Safety Association

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1. How to place the SG Mark on products subject to approval.

Consumer products that are considered to have the potential to cause fatalities or bodily injury to the general consumer are referred to as products subject to Approval. The Consumer Product Safety Association (CPSA) serves to set forth quality standards (i.e., Approval Standards) for those products subject to Approval, which are necessary for the prevention of fatalities or bodily injury to the general consumer.

In order for a product subject to Approval to receive the SG Mark, the product needs to pass an inspection demonstrating that it meets all applicable Approval Standards.

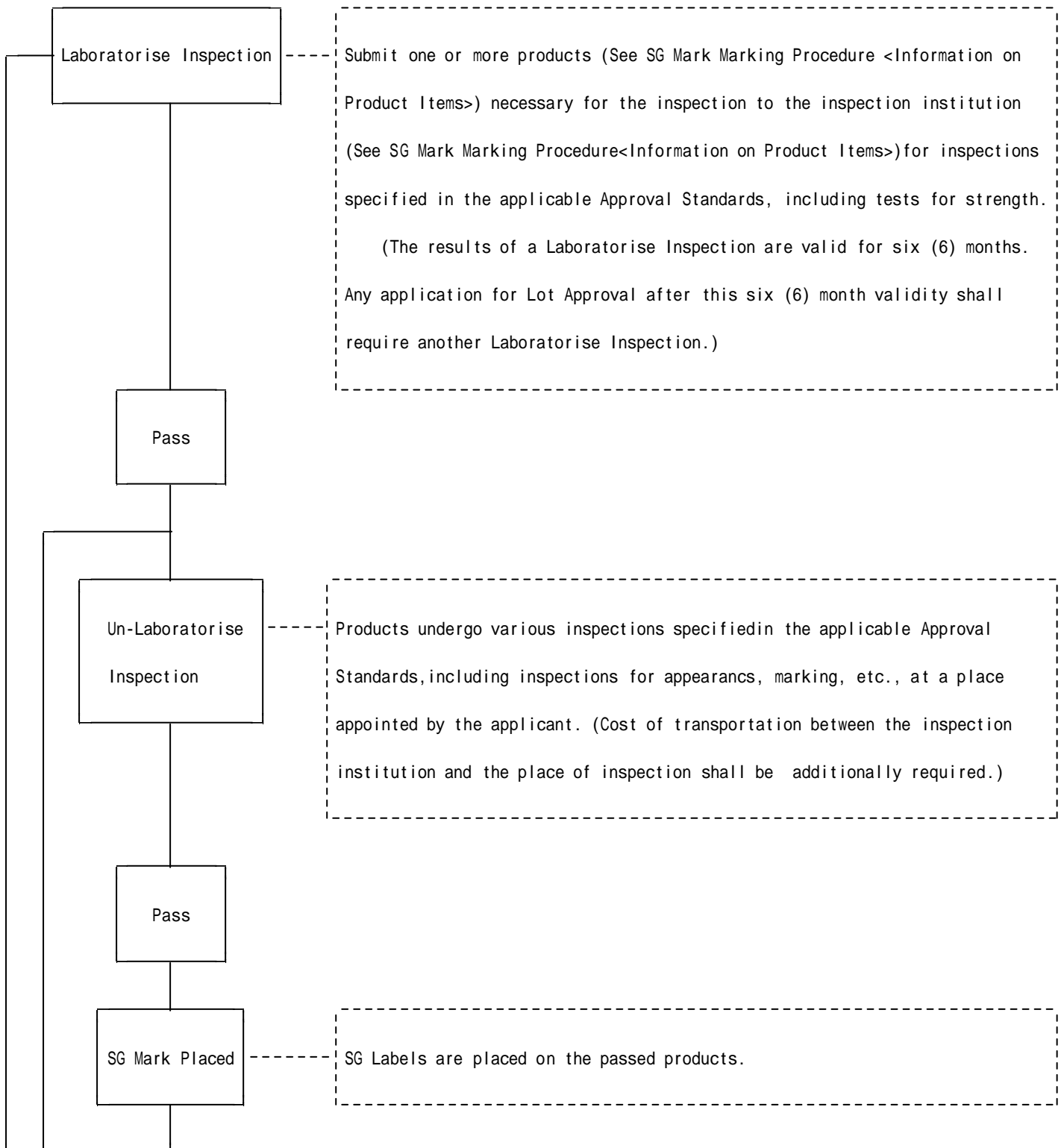
There are two types of inspection schemes to choose from: "Lot Approval" and "Factory Inspection/Model Approval." In the case of a Lot Approval, the manufacturer, importer or distributor of a product subject to Approval has the product inspected by an inspection institution appointed by the CPSA, and the SG Mark shall be placed on a passed product. In the case of Factory Inspection/Model Approval, a manufacturer who has been granted registration by the CPSA as a manufacturer having the capacity to continuously manufacture products which conform to the applicable Approval Standards (Manufacturer with Factory Inspection) seeks Model Approval for a product subject to Approval which the manufacturer plans to manufacture. Once a product is granted Model Approval and passes a subsequent internal-inspection, the manufacturer will be allowed to place the SG Mark on any product of the same model without undergoing inspections by inspection institutions.

In order to qualify for a Manufacturer with Factory Inspection, a prior factory investigation is required to demonstrate that its manufacturing and inspection facilities, as well as its quality control system, exceed certain standards.

An application may be filed in either Japanese or English.

2. Application procedure for Lot Approval

(1) Procedural Order



(2) Types of Sampling Inspections and Their Applications

Single Inspection: Inspection for each lot.

Weekly Inspection: If five (5) consecutive lots have passed Single Inspections, the volume of products projected to be produced during the immediately subsequent month (30 days) shall be regarded as one (1) lot. "SG" Labels shall be delivered in advance for the lot, while four (4) or more inspections (i.e., Weekly Inspections) shall be conducted in the meantime.

Monthly Inspection : If four (4) consecutive monthly lots above have passed Weekly Inspections, the volume of products projected to be produced during the immediately subsequent two (2) months (60 days) shall be regarded as one (1) lot, and two (2) or more inspections (i.e., Monthly Inspections) shall be conducted in the meantime.

* Application of Monthly Inspection system shall require that the internal inspection system has been established and the inspection records have been maintained and actively used.

* In the case of failure in Weekly Inspection or Monthly Inspection, only Single Inspection (See 1) above) shall be available.

(3) Accompanying documents

Four (4) copies each of the following support documents must accompany any initial application for Lot Approval.

The submission of the following support documents is required thereafter only in case of a change(s) in the information provided in the previously submitted support documents.

Model classification (See SG Mark Marking Procedure <Information on Product Items>)

Structure and materials of the product

Names of the manufacturer or importer, or the abbreviation and the place where the names are specified (Use of illustrations is also possible.)

Year and month of manufacture or the abbreviation thereof, and the place where the names are specified (Use of illustrations is also possible.) (If abbreviations are used, information on decoding the abbreviation must also be provided.)

Marking and instruction manual

Photograph or catalog

(4) Sample of support documents accompanying an initial application for Lot Approval

In the case of bicycle helmet

Model classification

型式の区分	
要素	区分
種類	① 1種類のもの 2 2種類のもの
用途	① 徒歩専用のもの 2 その他のもの
帽体の材質	1 A B S 樹脂製のもの ② F R P 樹脂製のもの 3 その他のもの

当社の呼び名 Z X - 1 , Z Y - 2

Structure and materials of the product

名称	材質
帽体	F R P 樹脂
衝撃吸収ライナー	発泡スチロール
ヘッドクッション	ウレタンフォーム
ヘッドバンド	ウレタンフォーム・ナイロン布
あごひも	ナイロン

Name of manufacture

安全工業株式会社 A N Z E N 帽体外面に印刷表示

Year and month of manufacture

1985年 1月 ——— 5 . A 帽体内面にラベルで表示

2月 5 . B

...

...

12月 5 . L

Marking and instruction manual

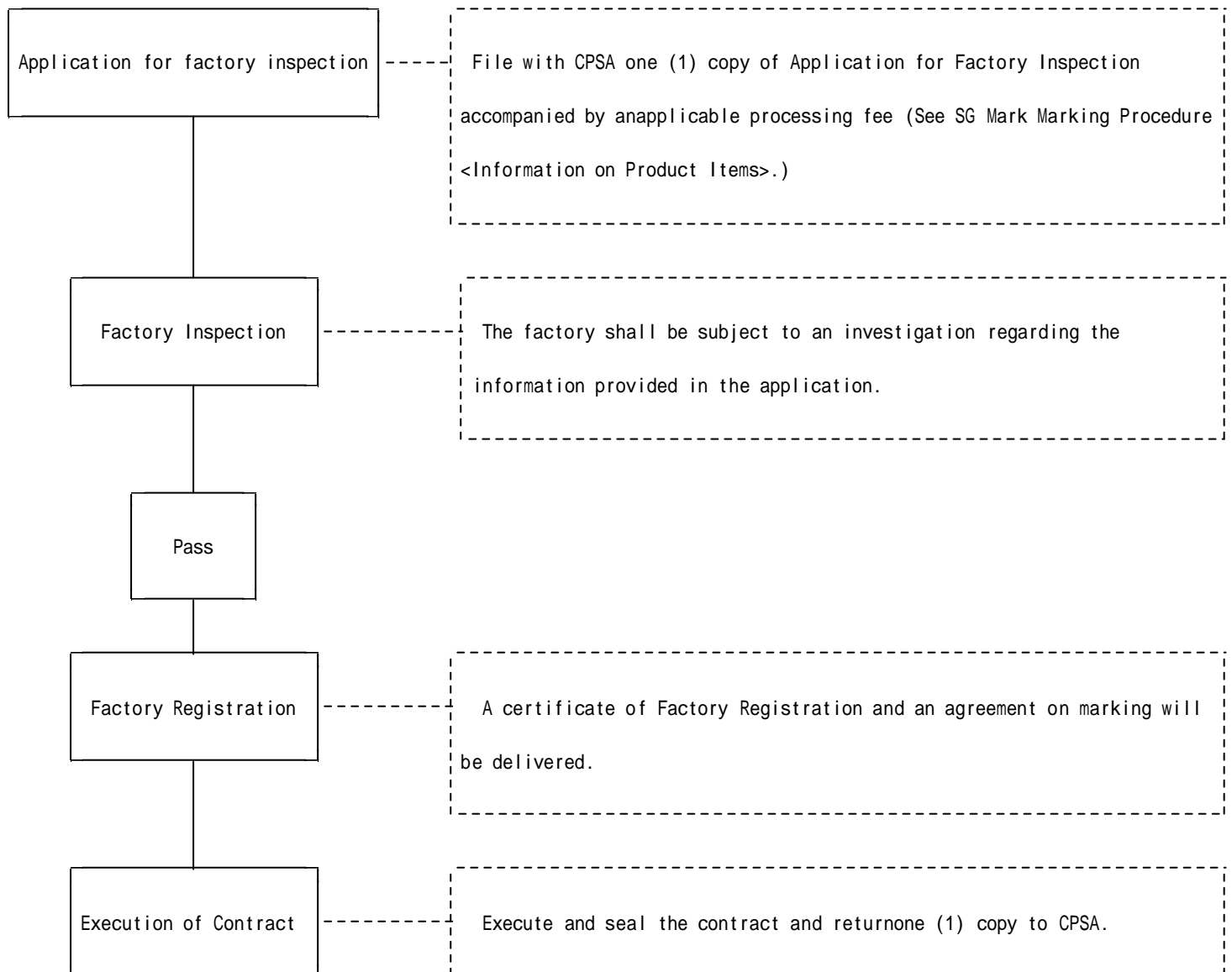
Instruction manual accompanying the product or the manuscript there of must be submitted.

Photograph

A catalog or photograph of the brand name indicated with the applicant's internal designation (name) of the product must be submitted.

3. Application procedure for Factory Inspection

(1) Procedural order



(2) Requirements for Factory Inspection

Any applicant must be equipped with the manufacturing and inspection facilities indicated in SG Mark Marking Procedure <Information on Product Items> and must exercise adequate quality control.

(3) Factory investigation method, etc.

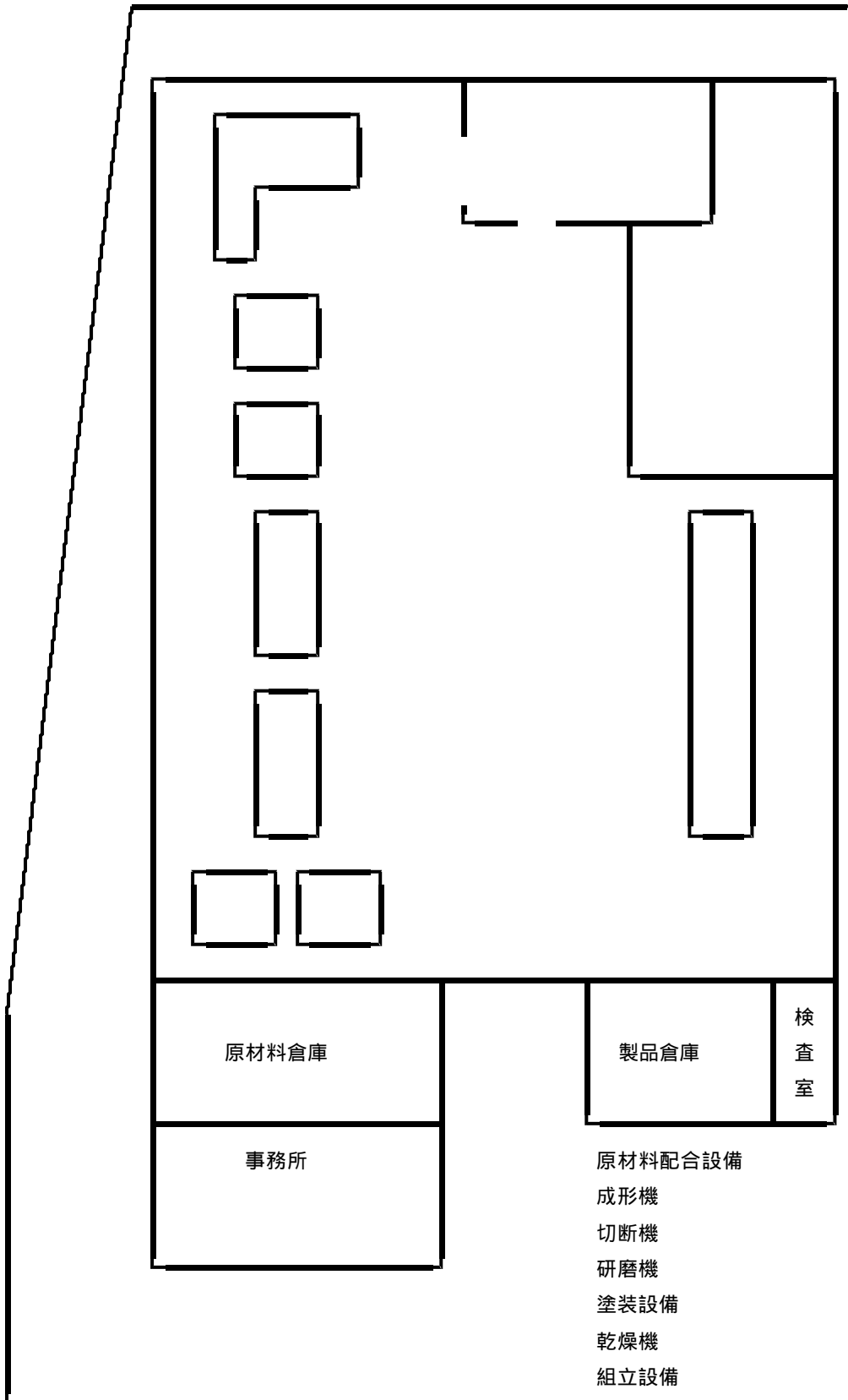
After an application for Factory Registration has been filed, CPSA will inform the applicant of the date of factory investigation.

A representative from CPSA visits the factory to carry out an investigation, according to the Guidelines for

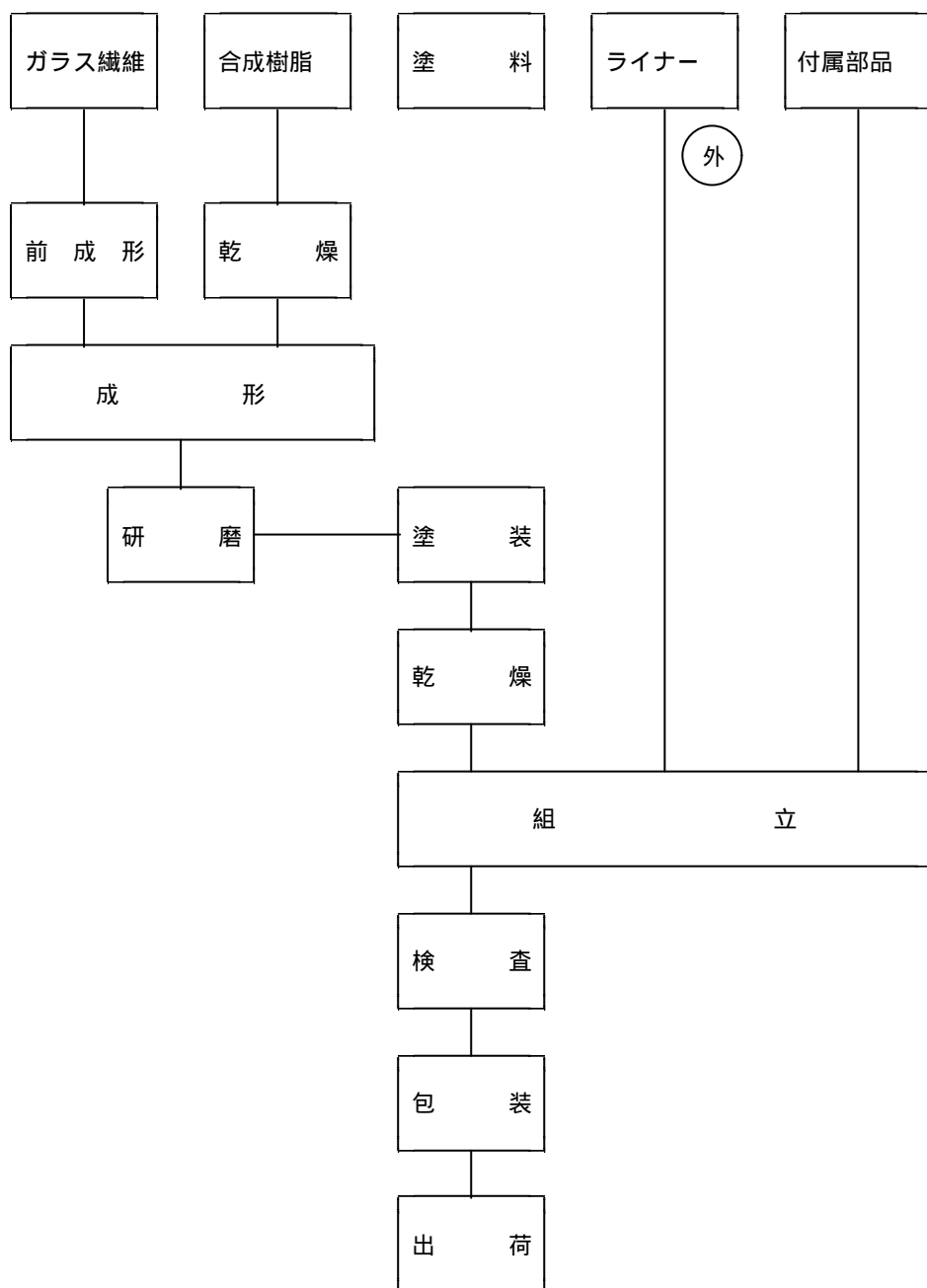
Factory Inspection, of various technical production conditions for the product subject to Approval, for which the application has been filed, which are necessary for the maintenance of quality, including the manufacturing facilities, inspection facilities, inspection method and the method of controlling the manufacturing process.

(4) Samples of completed accompanying documents

Accompanying document 1 (Layout of the factory)



Accompanying document 2 (Diagram of Manufacturing process)



*Any process which is delegated to a subcontractor must be so marked with "外" (delegated).

Accompanying document 3 (Outline of internal-testing method)

If a written form of internally-prepared inspection guidelines exists, it must be submitted. If enclosure of the entire guidelines is impossible due to its large page volume, part of the guidelines may be enclosed.

If a written form of inspection guidelines does not exist, prepare written inspection guidelines, at least incorporating the following, and attach them to the application.

1. RE: Interl-testing inspection

Inspection items; inspection standards; inspection method; time of inspection (including frequency and number of products inspected); judging criteria (pass or failure); treatment in case of failure; recording format

2. RE: Inspection delegated to outside institution

Inspection items; inspection standards; time of inspection (including frequency and number of products inspected); information on the outside institution to whom inspection is to be delegated; treatment in case of failure

Accompanying document 4 (Names of primary materials/components and manufacturers or subcontractors)

資材又は部品名	製造業者名又は外注先
A B S樹脂	合成ゴム(株)
衝撃吸収ライナー	産業(株)
ヘルメット装着品	商店
あごひも	製作所
クッション	〃
組付金具	工業

Accompanying document 5 (Manufacturing facilities)

製造工程名	名 称	性 能	台 数
原料配合	攪 拌 機		1 台
	坪		2 台
原料乾燥	乾 燥 機		1 台
	ホッパードライヤー		1 台
成 形	射出成形機		2 台
	金 型		10 ケ

Accompanying document 6 (Inspection facilities)

検査項目	名 称	性 能	台 数
あごひも強度試験	荷重試験機	(0 ~ 160kg)	1 台
耐貫通性試験	耐貫通性試験装置	落下高さ 0 ~ 1.8 m ストライカー質量 3 kg	1 式
衝撃吸収性試験	衝撃吸収性試験装置	落下高さ 0 ~ 1.8 m	1 式

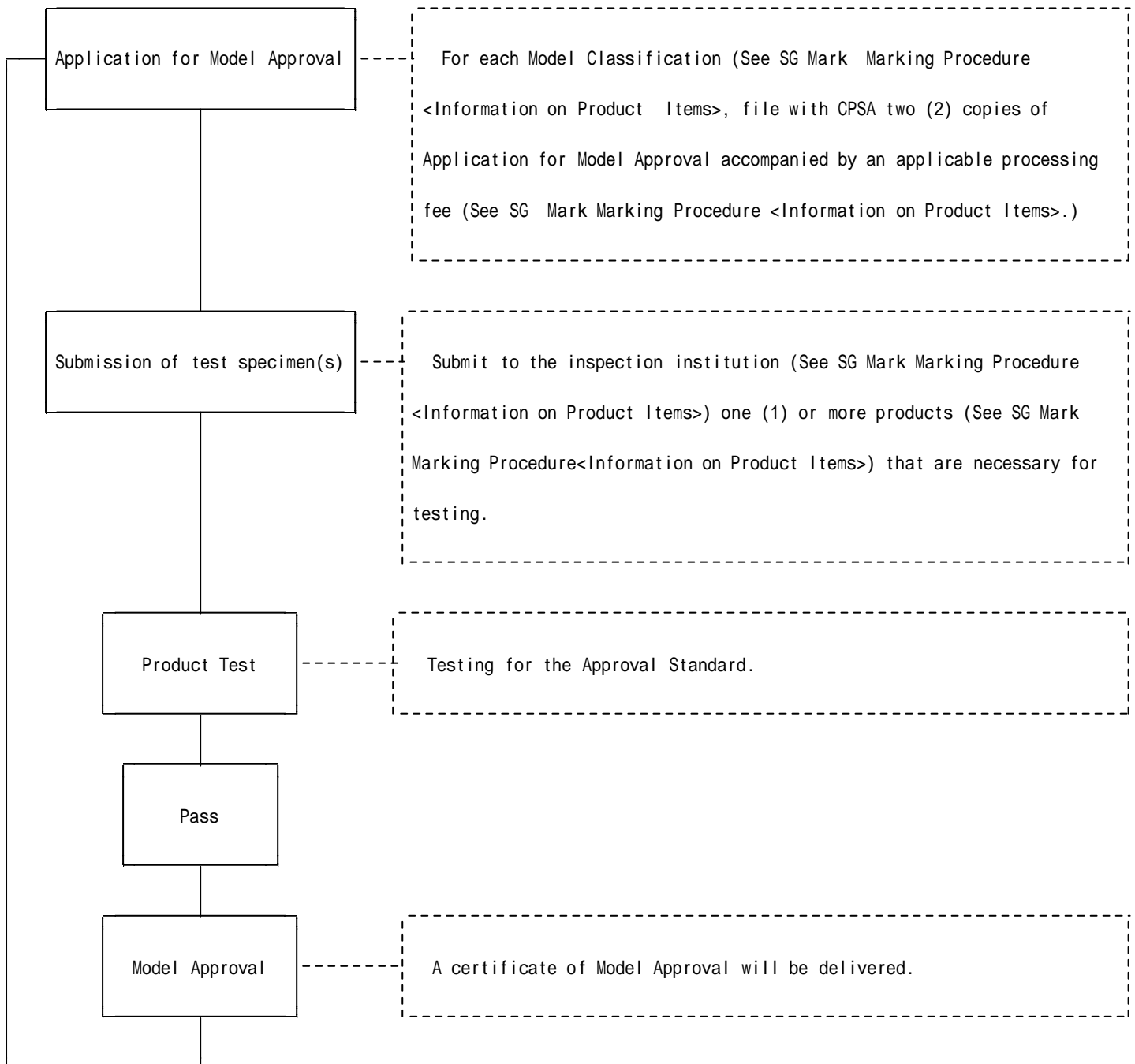
Accompanying document 7 (Written explanation of Inapplicability of Article 14 of Consumer Product Safety Association Procedural Manual.)

- 1 当社は、製品安全協会業務方法書第14条の規定により工場等登録を取り消された事実はありません。
- 2 当社役員のうち前号に該当するものではありません。

代表者名

4. Application procedure for Model Approval

(1) Procedural order



(2) Model Approval test, etc.

A certificate of Model Approval will be delivered upon passing the product test.

In case of a failure, the inspection institution will notify the applicant of the cause(s) of the failure and provide remedial guidance or the equivalent.

If the cause(s) of the failure has been rectified, a certificate of Model Approval shall be delivered, while a notification of failure shall be delivered if the applicant fails to rectify the cause(s) pointed out by the inspection institution.

(3) Renewal of Model Approval

Application for the renewal of Model Approval must be filed, as indicated in "(1) Procedural order" above, two (2) months prior to the date of expiration of Model Approval, which is valid for one (1) to five (5) years (See SG Mark Marking Procedure <Information on Product Items>).(See page 20 for application for renewal of Model Approval.)

(4) Samples of completed accompanying documents for application for Model Approval

Accompanying document 1 (Model classification and the applicant's internal designation (brand name) of the product

In the case of bicycle helmet

Model classification

型式の区分	
要素	区分
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Structure and materials of the product

名 称	材 質
帽体	F R P 樹脂
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ヘッドバンド	ウレタンフォーム・ナイロン布
あごひも	ナイロン

Name of manufacture

安全工業(株) A N Z E N 帽体外面に印刷表示

Year and month of manufacture

1985年 1月 —— 5 . A 帽体内面にラベルで表示
 2月 5 . B
 ...
 ...
 12月 5 . L

Marking and instruction manual

Instruction manual accompanying the product or the manuscript there of must be submitted.

Photograph

A catalog or photograph of the brand name indicated with the applicant's internal designation (name) of the product must be submitted.

(2) Instruction Manual

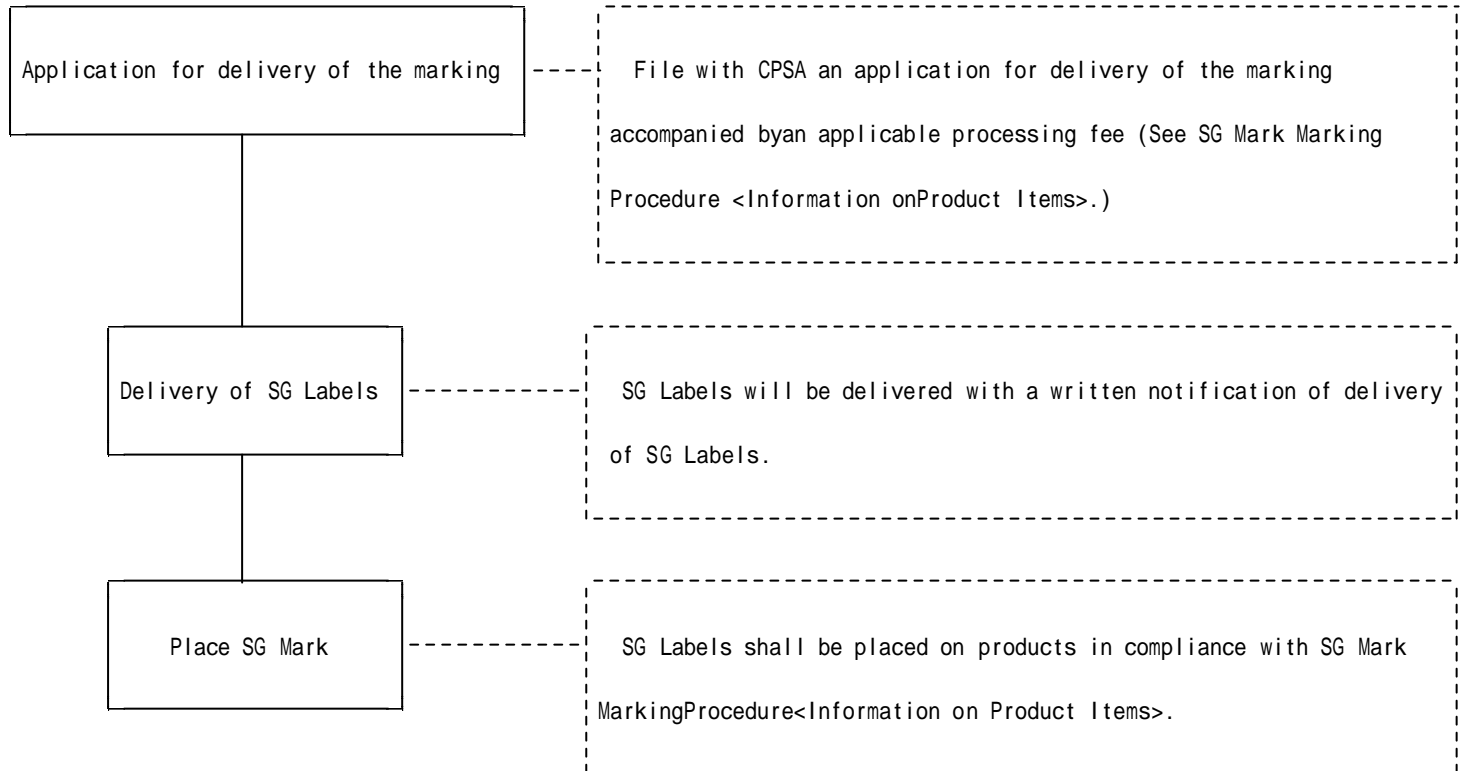
Instruction manual accompanying the product or the manuscript there of must be submitted.

Accompanying document 6 (Catalog or photograph)

A catalog or photograph of the brand name indicated with the applicant's internal designation (name) of the product must be submitted.

5. Application procedure for delivery of the marking (SG Labels)

(1) Procedural order



6. Post-investigation and Remedial Guidance

(1) Post-investigation

CPSA may, as the need arises, check whether the products manufactured at the factory in question conform to the applicable Approval Standard through investigating, from time to time after the granting of the Factory Registration, a manufacturer who has been granted a Factory Registration regarding the factory's manufacturing facilities, inspection facilities, inspection method, quality control method and any other technical production conditions necessary for the maintenance of the quality. These investigations are referred to as Post-investigations.

(2) Remedial guidance

CPSA may, as the need arises, instruct an applicant for Lot Approval or a manufacturer who has been granted Factory Registration to exercise, within a certain period of time, the necessary measures, such as the improvement of the manufacturing process and/or inspection method. These instructions are referred to as Remedial Guidance.

7. Guidelines for Factory Investigation

Item of Investigation	Descriptions of Investigation
1. Product standard	<p>(1) Examine whether the product standard is at least equivalent to the applicable Approval Standard, in terms of appearance, construction, dimensions, strength, materials used, marking, etc.</p> <p>(2) Examine whether the necessary drawings or otherwise of the product exist, satisfying the product standard.</p>
2. Management of materials	<p>(1) Check how the quality of materials and the relevant acceptance inspection method have been established.</p>
3. Manufacturing process control	<p>(1) Examine the operational standard established, the actual performance of operations (including in-process inspections), and the quality control over the subcontractor, if there is a process delegated to a third party.</p>
4. Management of manufacturing and inspection facilities	<p>(1) Examine the manufacturing and inspection facilities for conformity with the technical standards included in the By-laws of the Procedural Manual.</p> <p>(2) Examine whether examination/inspection method, frequency, etc. have been adequately established in order to maintain the performance of the manufacturing and inspection facilities.</p>
5. Product inspection standard	<p>(1) Examine whether an inspection standard at least meeting the requirements set forth in the applicable Approval Standard and Inspection Manual has been established.</p> <p>(2) Examine whether a lot subject to inspection, the number of products to be inspected, format of inspection report, etc. have been established.</p>

8. Consumer Product Safety Association Procedural Manual(Extract)

Article 8 (Factory Registration)

CPSA shall accept any application by a manufacturer who engages in the manufacture of a product subject to Approval in Japan, so long as the application satisfies each of the following conditions. The factory or business establishment relevant to the application in question, hereinafter generically referred to as Factory, shall be either: facilities for the manufacture of products in question that are subject to Approval, which are facilities specified in the By Detailed Provisions, hereinafter referred to as Manufacturing Facilities, or facilities for an inspection of products in question that are subject to Approval, which are facilities specified in the By Detailed Provisions, hereinafter referred to as Inspection Facilities. CPSA shall examine the Facilities through the method specified in the By Detailed Provisions. If the results of the examinations prove to conform to the technical standards set forth in the By Detailed Provisions, CPSA shall grant Factory Registration according to the classification of business in the manufacture of products subject to Approval, which has been set forth in the By Detailed Provisions (hereinafter referred to as Classification of Business), provided, however, any applicant who has been granted Registration under Article 8 Section 1 or Article 32-2 Section 1 of the Act may be exempted from the aforementioned examination.

1) That the application is adequate, containing the information on items a) through e)

below:

a) Full name and address of the applicant; full name of the authorized representative and name and address of the corporate applicant, if applicable.

b) Classification of Business

c) Name and location of the Factory where the products subject to Approval are to be manufactured

d) Name, performance and number(s) of Manufacturing Facilities

e) Name, performance and number(s) of Inspection Facilities

2) That the application specified in the foregoing paragraph is accompanied by the documents specified in the By-Detailed Provisions including drawings of the Factory mentioned in c) above.

3) That an applicable processing fee specified in the regulations on processing fees has been paid concurrently with the application in the manner set forth in the said regulations.

4) That the applicant has neither, at least for the last two years, experienced cancellation of Factory Registration according to the stipulation in Article 14 nor been an officer of a corporation whose Factory Registration has been canceled according to Article 14. In the case of a corporate applicant, there must be no officers, among the officers

engaging in the operations in question, to whom the foregoing restrictions apply.

Article 14 (Cancellation of Factory Registration)

CPSA may cancel Factory Registration if any of the following applies to the manufacturer who has been granted Factory Registration:

1. The Factory Registration under Article 8 has been acquired through unjust measures.
2. The manufacturer who has been granted Factory Registration has failed to promptly inform CPSA of a material change with regard to any of items (a) through (e) of Article 8 1) above.
3. A problem has not been rectified within a certain period of time despite remedial guidance provided under Article 18 Section 1 Sub-section 1.
4. An officer of the corporation, who engages in the operation in question, has been found to have experienced cancellation of Factory Registration within the last two(2) years.
5. The entity who has been granted Factory Registration has conducted an act of bad faith, including conduct in breach of regulations contained in this Procedural Manual or the By Detailed Provisions

Article 18 (Remedial Guidance)

1. In the event that any of the following applies, CPSA may, when any of the following applies, instruct an applicant for Lot Approval or a manufacturer who has been granted Factory Registration to exercise, within a certain period of time, the necessary measures for improvement, such as the repair or remodeling of manufacturing and/or inspection facilities, or the improvement of the manufacturing, inspection and/or other operational methods for the product for which Model Approval has been granted.

1) The manufacturing or inspection facilities do not conform to the technical standards set forth in the detailed regulations included in Article 8 above.

2) The manufacturer who has been granted Factory Registration manufactures products, the model of which is subject to Model Approval, without conforming to the applicable Approval Standard.

2. If a considerable cost of transportation or otherwise is needed due to the distant location of the Factory subject to the foregoing Remedial Guidance, CPSA shall collect part of the cost, according to the regulations on processing fees.

3. By Detailed Provisions shall be established with regard to the procedure and other necessary matters pertaining to Section 1 above.