

Getting *inked*

To manufacture a safe and compliant product, all components of the product must be tested—down to the last drop of ink

SUPPLIERS HAVE BEEN placed in a precarious situation. They purchase blank goods that have been tested for safety and are compliant. Seems like they've done their due diligence and are in the clear, but what about decoration?

Much decoration comes in the form of ink ... ink that hasn't been tested for safety and compliance. The argument from the ink manufacturers has been that ink isn't a children's product that requires stringent safety testing to be compliant with the Consumer Product Safety Improvement Act (CPSIA). Rather, ink is viewed as a general-use product and is therefore not subject to third-party testing.

In theory, this may be true. But in reality, when a Onesie is imprinted with a college mascot or a teddy bear is decorated with a day care center logo, things change.

ELIMINATING THE BUDGET EXCUSE

It's expensive to do the tests. "Given the cost of sending an entire line of inks for testing at once, it's no surprise ink suppliers have been reticent in the past to submit their products to third-party testing," explained D E Fenton, executive director – compliance for Quality Certification Alliance (QCA).

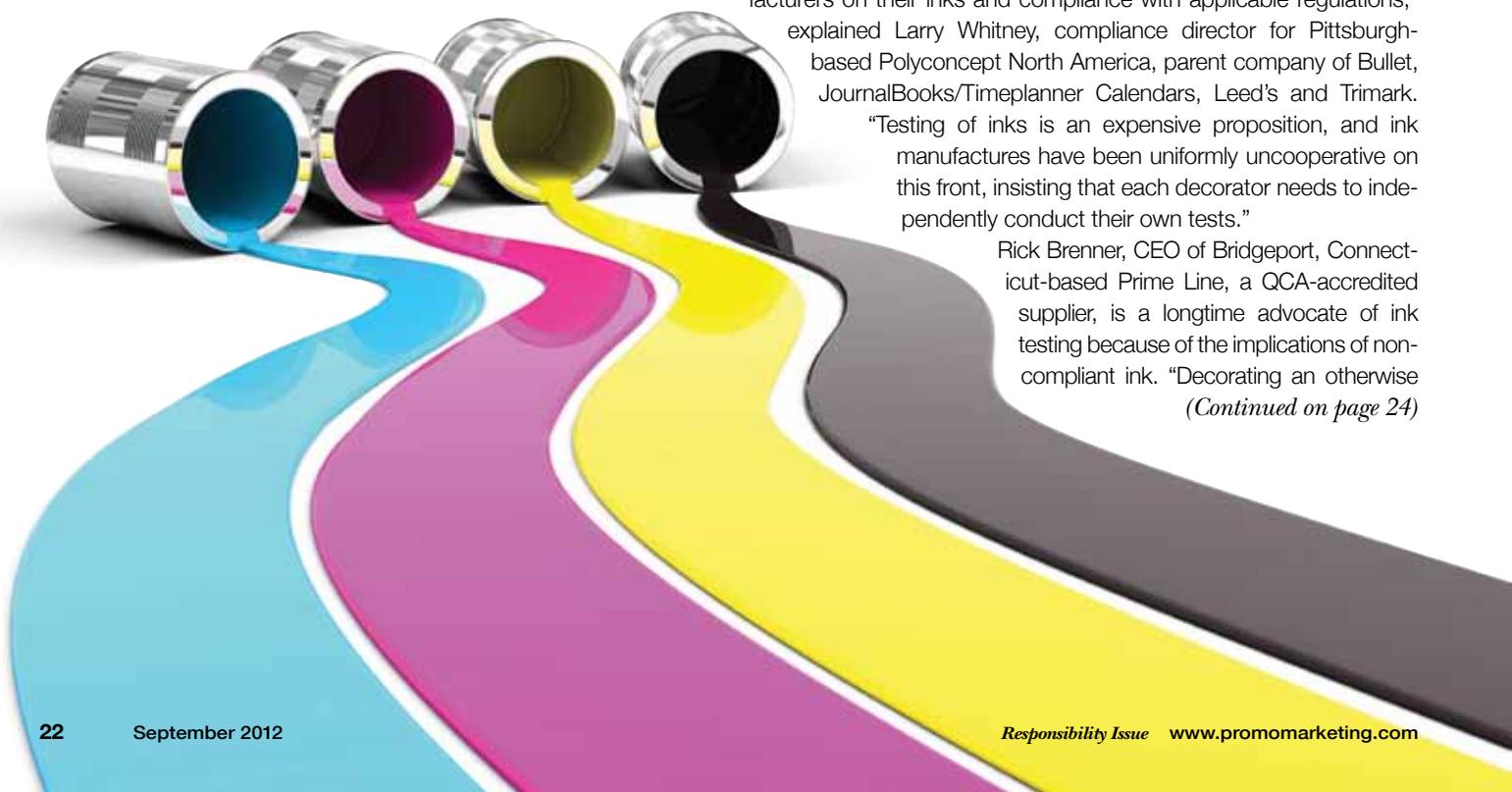
While cost may have been an initial deterrent, it is even more expensive not to test. And it's more than just the cost of bad publicity and loss of business if a recall is necessary. If an unsafe product is distributed to the general public, someone could get sick. However rare and unlikely, someone might even die. Can you really put a price on a person's life? For a promotional product?

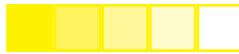
Decorating a blank product materially changes it so suppliers must test the ink if the product is subject to regulations. "As a decorator, we have struggled to get good data from many domestic ink manufacturers on their inks and compliance with applicable regulations," explained Larry Whitney, compliance director for Pittsburgh-based Polyconcept North America, parent company of Bullet, JournalBooks/Timeplanner Calendars, Leed's and Trimark.

"Testing of inks is an expensive proposition, and ink manufacturers have been uniformly uncooperative on this front, insisting that each decorator needs to independently conduct their own tests."

Rick Brenner, CEO of Bridgeport, Connecticut-based Prime Line, a QCA-accredited supplier, is a longtime advocate of ink testing because of the implications of non-compliant ink. "Decorating an otherwise

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compliant product with noncompliant ink negates the entire process making the overall product noncompliant, and this cannot continue if our industry wants to be the trusted marketing partners to our buyers that we all should be striving to be," he said.

Since inks have been subject to federal requirements in the U.S. since 1978, it's surprising that there has been such resistance to safety testing. "The fact of the matter is that the manufacturers are in violation of federal law should they sell a liquid ink that does not meet those standards," Whitney said. "CPSIA has tightened those federal standards, and if ink manufacturers sell any of us an illegal ink, they are in serious legal hot water."

With ink manufacturers stalling and suppliers not being able to absorb the high cost for testing all their inks themselves, multiple companies came together to share the costs.

QCA already offered this alliance of like-minded companies that have dedicated significant time and resources to developing compliance programs to ensure they are providing safe and compliant products. So it made sense for these companies to lead the charge on testing inks.

TESTING BASICS

To be in full compliance, suppliers must have a complete bill of materials for every product and demonstrate that applicable products are in compliance with applicable regulations. If regulated products are being decorated with additional materials, then those materials must also meet applicable standards (for example, children's products must be in compliance with CPSC regulations).

For suppliers seeking QCA accreditation, they must demonstrate they have a mechanism for evaluating materials being used to transform (i.e. decorate) their products, and this includes testing reports. Initially, only Material Safety Data Sheets (MSDS) were available along with a number of long-outdated test reports. That's when Prime Line's Brenner, along with the QCA Compliance Committee spearheaded a two-year campaign to get ink manufacturers to test their products.

"Only after QCA-accredited suppliers, as well as QCA applicants, agreed to fund testing for the most commonly used inks amongst themselves did ink manufacturers agree to release samples for testing," Fenton explained. "Once ink suppliers realized the value of testing and the potential economies that could be achieved by testing with the right partners, a number of the manufacturers determined that, besides being a matter of regulatory compliance, it was also a good business decision for them and the rest of their lines."

The QCA Ink Testing Initiative, as it is now known, began with negotiating favorable pricing with ANSECO Group, an independent third-party consumer products testing laboratory. Once the testing arrangements were in place, ink suppliers were recruited.

"Two of the leading manufacturers supplying inks for promotional products [Marabu and Ink Cups Now (ICN)] found the proposal so compelling that they tested far deeper into their lines and, in one case, the entire line," said Fenton. In total, QCA worked with seven ink suppliers to conduct more than 850 individual tests measuring lead, cadmium, soluble heavy metals and phthalate content. In addition to Marabu and Ink Cups Now (ICN), International Coatings, Nazdar and three other ink manufacturers tested the inks used on promotional products.

SCHEDULING PRODUCTION

One of the benefits of having testing done is that it makes compliance less arduous and doesn't interfere with the small-quantity/short lead-time orders that make up the bulk of our industry's business.

Typically, when testing is required or requested, a blank product that is representative of the production run is submitted to a testing lab for evaluation. However, the requirement is that the finished, decorated product is to be tested. But this requirement is difficult for our industry to meet.

"The short lead times and low average order size in our industry simply do not allow enough time for the newly decorated item to be sent out for testing," said Brent Stone, executive director of operations for QCA. Most promotional products suppliers purchase an inventory of blank goods that will be sold in the future to individual customers. Suppliers warehouse this undecorated inventory, awaiting a customer's order, which frequently has a 24-hour turnaround. Because decoration may only be finalized months—sometimes even a year—after the blanks are shipped, suppliers have no idea what logos will be placed on the products. "Even if you were able to rush the testing service, the cost for testing these small orders would be prohibitive," said Stone.

This is where component testing comes into play. "Essentially, component testing of inks used in decoration in conjunction with the existing testing of blank product is the only way suppliers can ensure short-lead-time orders are compliant," explained Stone.

REACHING A WIDER MARKET

To keep the Ink Testing Initiative moving forward, QCA was able to enlist Marci Kinter, vice president of government affairs and business information at Specialty Graphic Imaging Association (SGIA), to carry the project forward. SGIA was looking for the business case to help their members understand their regulatory responsibility, and QCA provided it. As a result, ANSECO and SGIA will now offer the package that QCA negotiated to the wider ink manufacturing industry—generating a greater impact than initially imagined.

"Efforts such as these that focus not only on validating products as conforming to regulations and standards but also on identifying potential issues in advance benefit the wider market by ensuring the availability of safer and compliant consumer products," said Dr. Angelo Fatta, CEO of ANSECO Group. "This is essential for reducing risk and protecting our overall brand equity."

"The QCA Ink Testing Initiative represents a move forward in the market for safer and compliant products," said Clif Treco, North American sales manager for Marabu. "While the testing was initially targeted for the promotional products industry, the results have a much bigger impact because our inks are also used by numerous consumer companies that sell at the retail level," he explained. 

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