



Fashion Jewelry & Accessories Trade Association

25 Sea Grass Way
North Kingstown, RI 02852

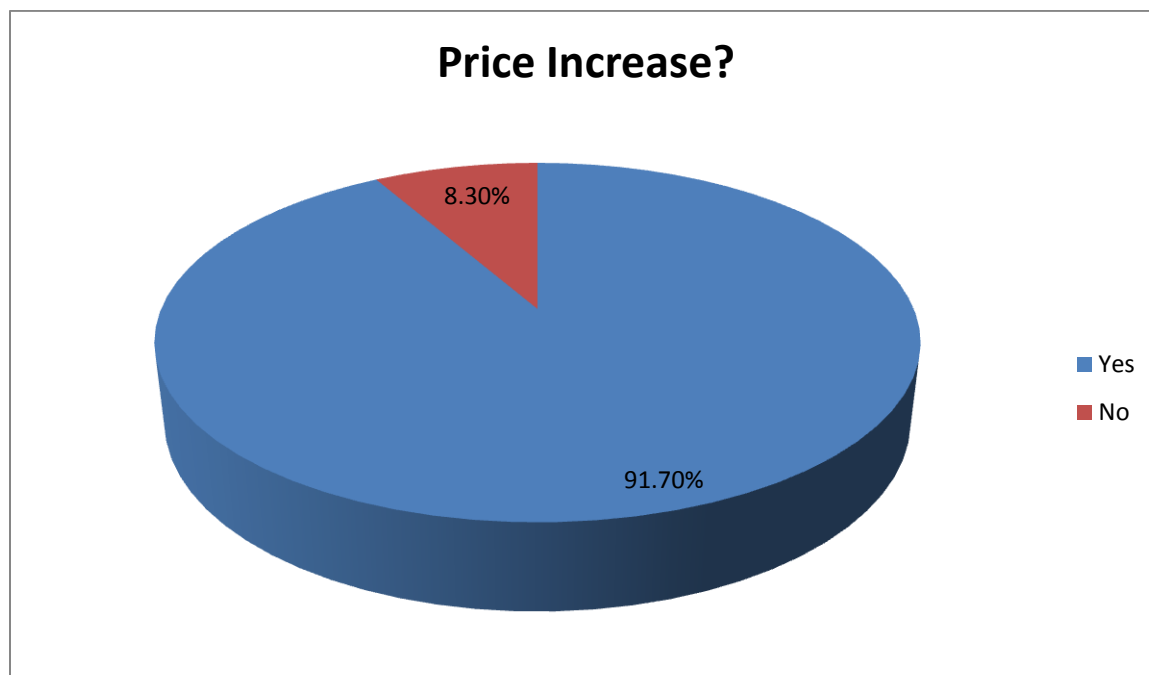
www.fjata.org

October 18, 2011

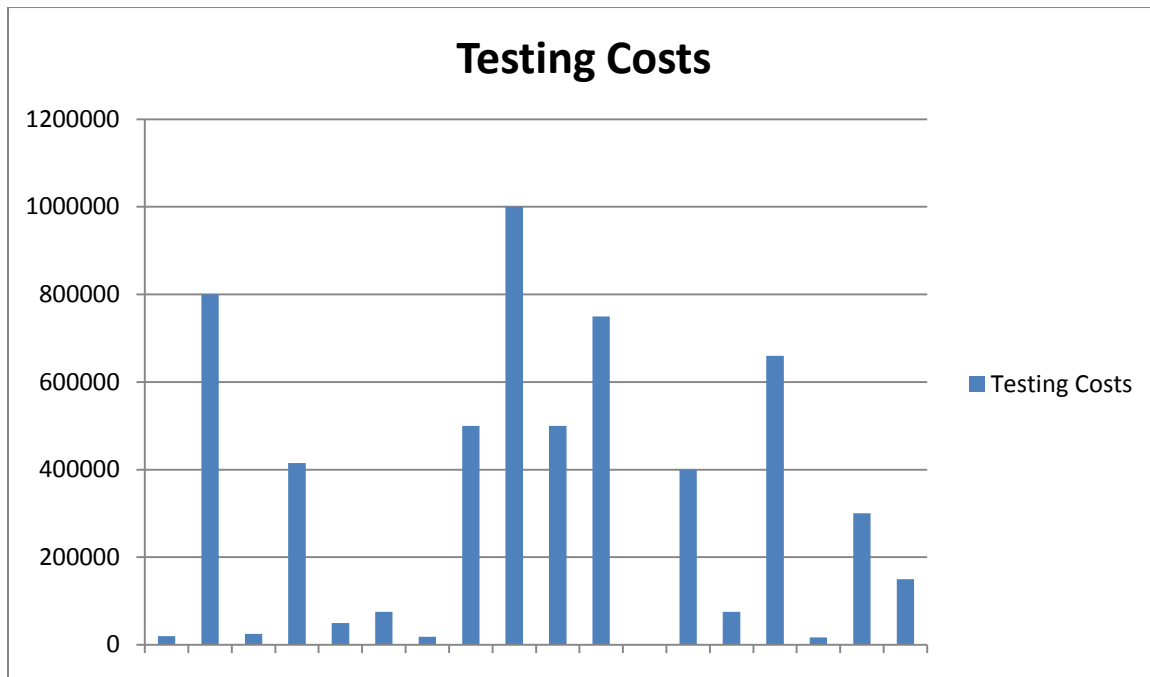
FJATA recently submitted a survey to members regarding their experience with compliance testing for jewelry products and accessories. The results are in and some conclusions can be drawn from these data. It is clear that testing is increasing prices for the most part, and that companies are spending more than ever on testing (reports are as high as \$1 million). Companies are challenged to reformulate or alter their children's product offerings as a way to navigate the recent legislation; however, many companies have made the necessary adjustments already.

Most companies have had to change suppliers due to compliance issues, and lead is the most significant offender. Important is the fact that 70% of companies testing a product that fails only miss the target level by 5% or less (inter-laboratory variability is addressed in the ASTM F15.24 Children's Jewelry Safety Standard). Important as well is the fact that the vast majority of companies face retailers who set their own standards, without direct reference to an existing law.

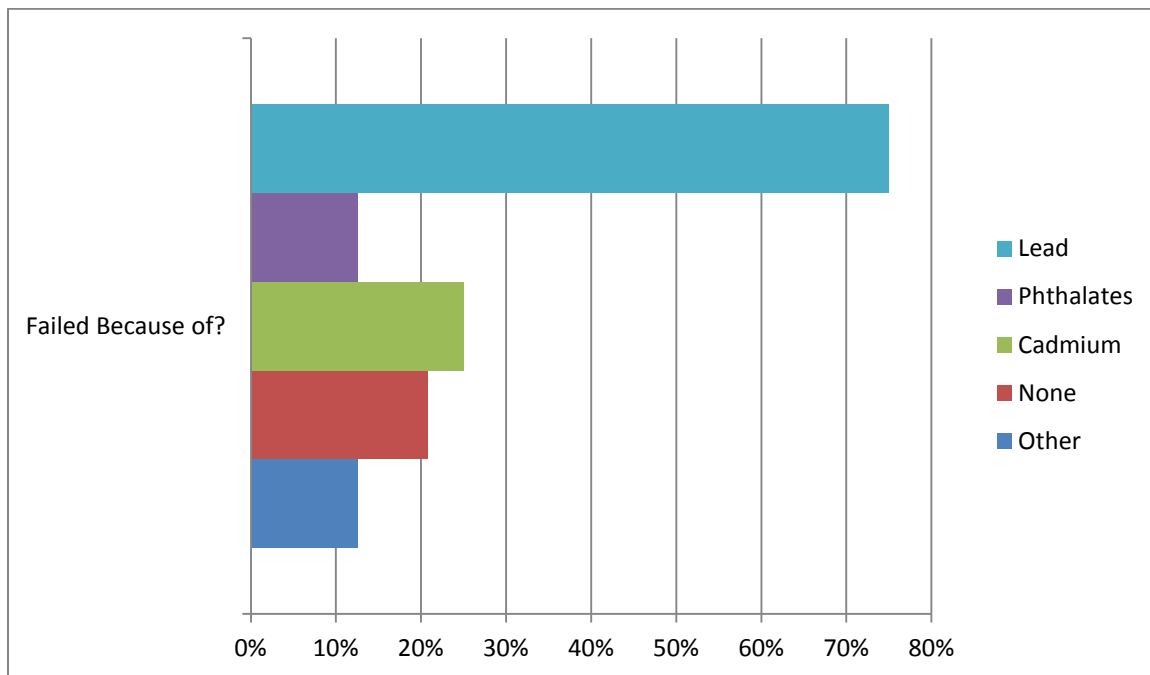
Question: "Has your company had to increase prices due to product compliance testing costs?" Most respondents answered that they had.



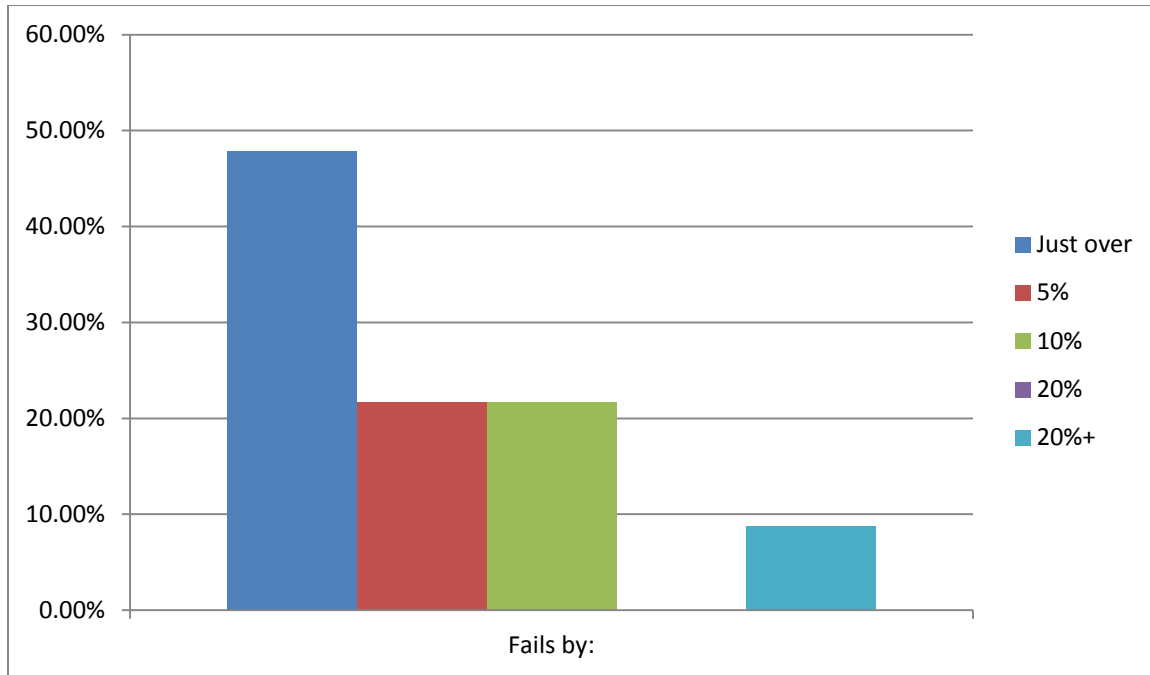
Question: “How much would you estimate that your company has spent on product compliance testing in the last fiscal year?” The answers were not delimited by size of the company, so that is why there is a wide range.



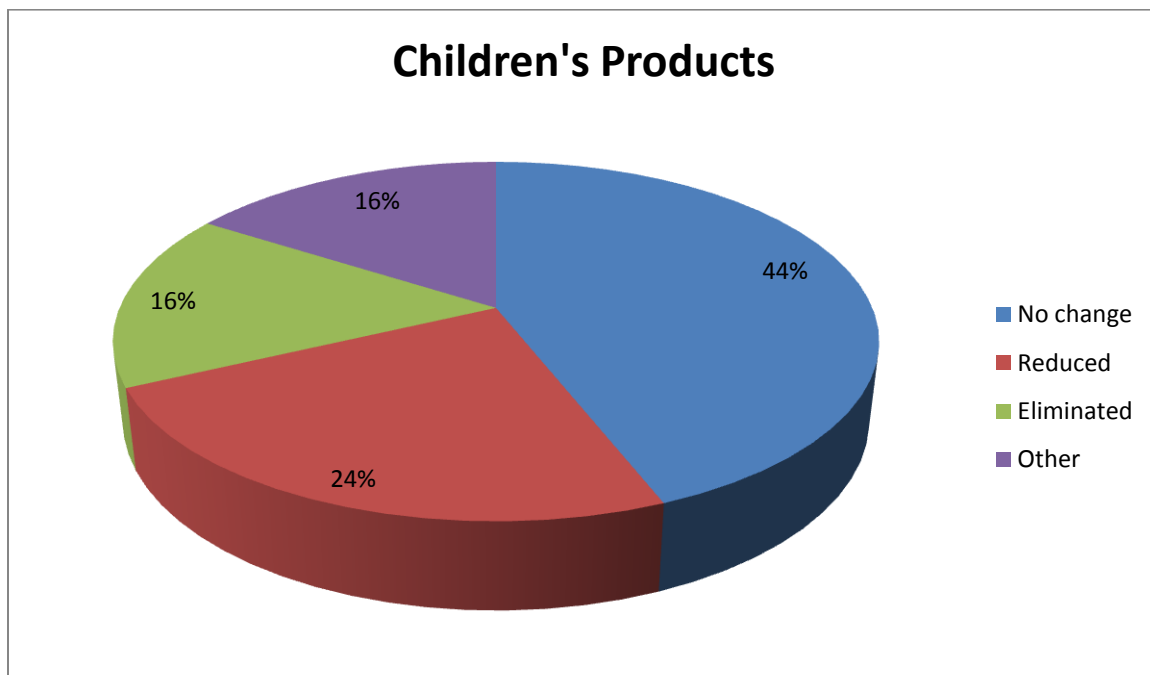
Question: “Which of the following has created the most failing results with regard to compliance testing?” Lead was understandably the biggest problem, since most testing is for lead. Nickel and tensile strength were among the “Other” responses submitted.



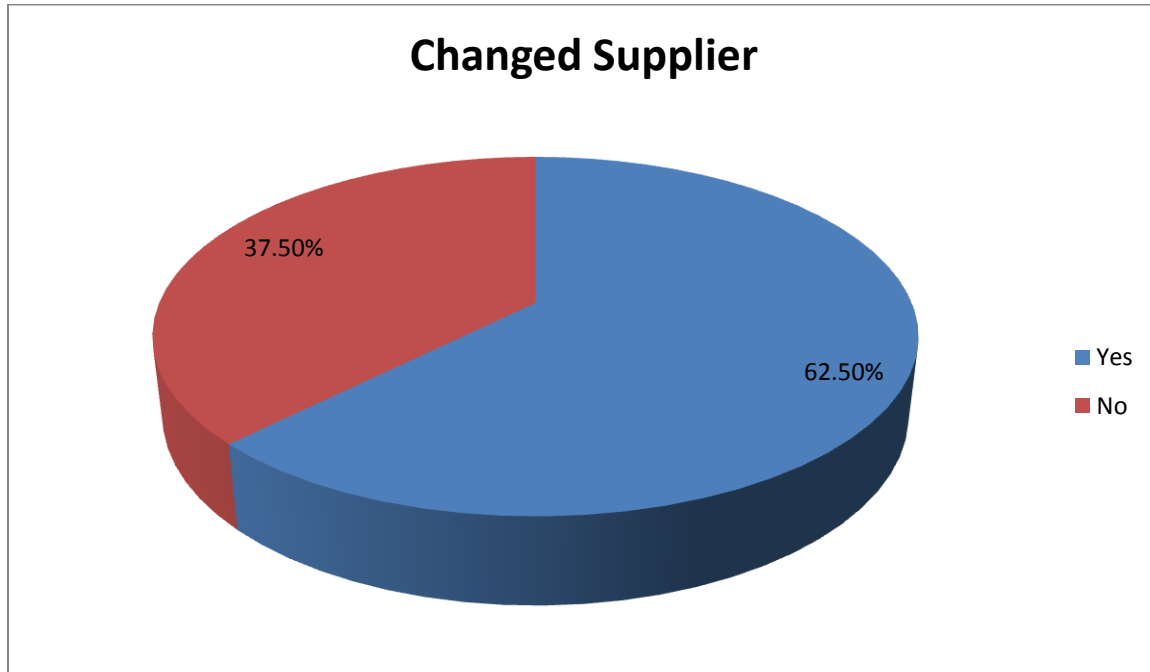
Question: “Regarding the last question, by what percentage is your product failing testing?” Answers indicate compliance is high as almost half of the respondents state that failing product is just missing target levels.



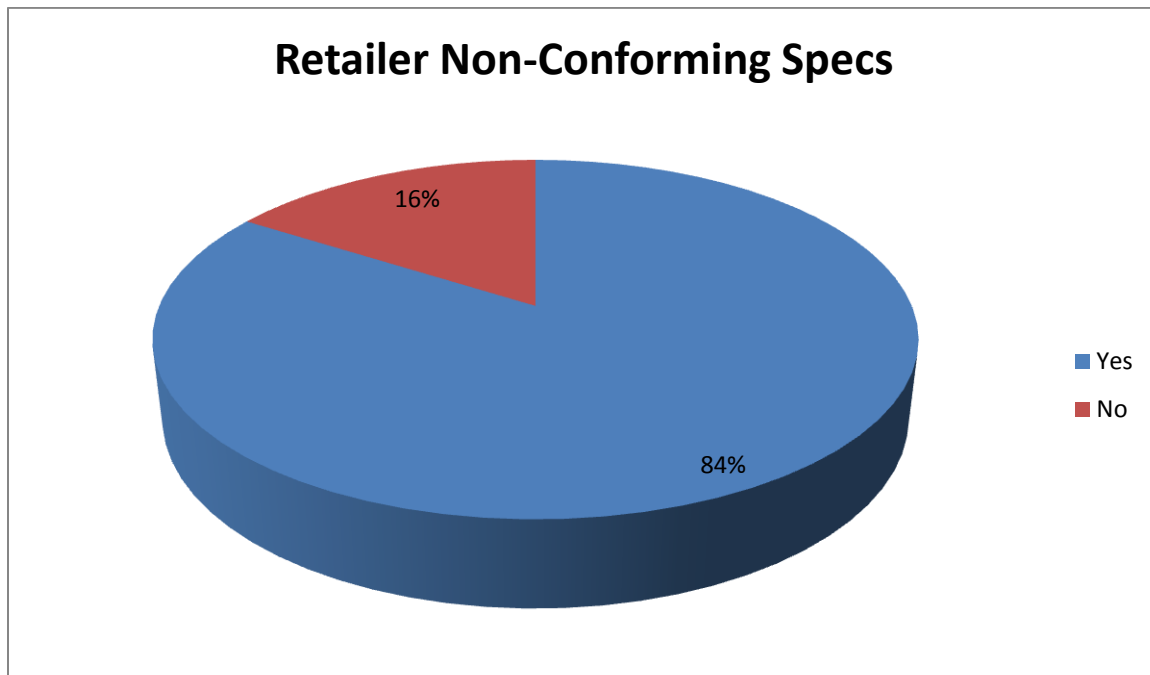
Question: “Which of the following best describes your company's product offerings since the advent of CPSIA?” In the “Other” category were respondents who answered that they had reduced/eliminated use of glass and crystal in children’s products, reduced/eliminated metal parts due to Illinois 40ppm labeling law, and raised concerns over Tween products, among other responses.



Question: "Has your company changed suppliers due to compliance issues?"



Question: "If you are a manufacturer/importer, do you find retailers specifying standards that are not conforming to current legislation?"



FJATA thanks members who participated in the survey. Your data is our best tool.