



CPSIA Overview

Consumer Product Safety Improvement Act of 2008 (CPSIA) was passed by U.S. Congress and signed into law by President Bush on Aug. 14, 2008. CPSIA is designed to allow The U.S. Consumer Products Safety Commission (CPSC) to better regulate the safety of products made and imported for sale in the U.S.

◆ CPSIA has regulations that effect retailers by regulating the amount of lead content in paint and similar surface coatings, lead content in metal, and phthalate content found in children's products. CPSIA also enforces the use of a tracking label for children's products.

CPSIA section 101(a) - lead content in paint & similar surface coating materials

◆ CPSIA Section 101(a) limits the lead content found in paint and similar surface coating materials for children's products. Children's products are defined as product designed or intended primarily for the use of children 12 years of age or younger.

◆ On August 14, 2009, for product manufactured after this date, the lead content in paint and similar surface coating materials limit for children's' products will be reduced from 600 ppm to 90 ppm.

◆ This would apply to children's item that is easily accessible by a child. In regards to clothing the items of concern be a screenprint, coated button, coated grommet, etc.

◆ Test method designed to follow to test lead content at an approved third party lab is CPSC-CH-E1003-09

CPSIA Section 101(a)- lead content in metal

◆ Per the CPSIA Section 101(a) the lead content in metal will be lowered from 600ppm to 300ppm on August 14, 2009.

◆ On August 14, 2011 the lead content limit will further be reduced to 100ppm (if technically feasible).

◆ This would apply to children's product that is easily accessible by a child. In regards to clothing it would be a metal trim such as button, zipper, grommet, etc.

CPSIA Section 108 – phthalates

◆ CPSIA Section 108 currently regulates phthalates (0.1% of the total weight for each phthalate: DEHP, DBP, BBP, DINP, DIDP, DnOP) in Child Care Articles & Toys.

◆ A Child Care Article is a consumer product designed or intended by the manufacturer to facilitate sleep or the feeding of children age 3 and younger, or to help such children with sucking or teething. For example a bib would facilitate feeding; a crib mattress would facilitate sleeping as would pajamas and crib sheets.

◆ This law applies to all parts of a product, even inaccessible parts.

◆ Phthaltes are plasticisers used to soften and make plastic more flexible. They are mainly used in PVC and banned due to their links to immune suppression, cancer, and reproductive and developmental harm.



CPSIA Section 103(a) – Tracking Labels

- ◆ This law requires manufacturers to have a tracking label or other distinguishing permanent mark on any consumer product primarily intended for children twelve and younger.
- ◆ The tracking label must contain certain basic information, including the source of the product, the date of manufacture and more detailed information on the manufacturing process such as a batch or run number.
- ◆ The scope of this provision is quite broad in that it applies to all children’s products, including, but not limited to, items such as clothing or shoes not just toys and other regulated products.
- ◆ Congress modified the requirement for tracking labels with the phrase “to the extent practicable” recognizing that it may not be practical for permanent distinguishing marks to be printed on small toys and other small products that are manufactured and shipped without individual packaging.

Toxics in Packaging Prevention Act

- ◆ In the United States compliance testing is required for all packaging and packaging components sold in the United States by government regulations identified by the Toxics in Packaging Prevention Act. (California Health and Safety Code Sections 25214.11-25214.21 Article 10.4.)
- ◆ This act limited the amount of lead, mercury, cadmium, and hexavalent chromium in packages and packaging components.
- ◆ This law bans the intentional introduction of these metals by the manufacturer in any amount and limits the incidental presence of the sum total of these metals to 100 parts per million (ppm).
- ◆ The terms “package” and “packaging component” are very broad cover all aspects of packaging from the paper to the inks and adhesives used for exterior labels. These terms are more clearly defined in ASTM specification D996.

Europe’s packaging and Packaging Waste Directive 94/62/EC

- ◆ This Directive aims to harmonize national measures in order to prevent or reduce the impact of packaging and packaging waste on the environment and to ensure the functioning of the Internal Market. It contains provisions on the prevention of packaging waste, on the re-use of packaging and on the recovery and recycling of packaging waste.
- ◆ This directive is very similar to Toxics in Packaging Act, however Toxics in Packaging is stricter since it also bans the “unintentional introduction” of these metals.
- ◆ The sum of concentration levels of lead, cadmium, mercury and hexavalent chromium present in packaging or packaging components shall not exceed the following 100 ppm by weight. Article 22 (i).



Regulation	Products that may be effected *	Requirement	Age Requirement	Date of Effect
CPSIA - Lead Content in Paint and Similar Surface Coatings	any painted surface or surface coating including screenprints, painted trims, toys	90ppm or less	Children 12 years of age and younger	August 14, 2009
CPSIA - Lead content in metal	Metal items such as grommets, zippers, buttons	300ppm or less	Children 12 years of age and younger	August 14, 2009
CPSIA - Lead content in metal	Metal items such as grommets, zippers, buttons	100ppm or less (unless the Commission determines it is not technologically feasible)	Children 12 years of age and younger	August 14, 2011
CPSIA -Phthalates	Child care articles – bibs, sleepwear, blankets, pacifiers	0.1% of the total weight for each phthalate: DEHP, DBP, BBP, DINP, DIDP, DnOP	Children 3 years or age and younger	February 10, 2009
CPSIA -Tracking label	All children’s clothes, toys, shoes	Label must contain: source of product, date of manufacture, batch or run number	Children 12 years of age and younger	August 14, 2009
Toxics in Packaging	All packaging and packaging components	Sum of lead, mercury, cadmium, + chromium VI must equal 100ppm or less	No age requirement	1992, revised 2008
EU Directive on Packaging and Packaging Waste	All packaging and packaging components	Sum of lead, mercury, cadmium, + chromium VI must equal 100ppm or less	No age requirement	1992, revised 2005

* this serves as a list examples of products that may be effected by these regulations