Product Responsibility: A Journey...Not A Destination

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Please remember...

• This information is being furnished for educational and informational purposes only. The Association makes no warranties or representations about specific dates, coverage or application. Consult with appropriate legal counsel about the specific application of the law to your business and products.
Agenda

• Why you need to know this stuff?
• Remember 2007?
• Consumer Product Safety Improvement Act of 2008
• If you sell children’s products, what must you do?
• Children’s Product Certificates
• Tracking labels
• Apparel
• What worries me?
• How do you determine if something is a children’s product?
• A quick word on Prop 65
• Resources
Why you need to know this stuff...
Emerging challenges

- Increasingly end buyers and government agencies are demanding more from our industry
  - Social
  - Environmental
  - Product responsibility
We are in the brand protection business

• Compliance with Federal and state regulations is not optional

• It can be a strategic advantage and increase your value to your customer
Product responsibility is everyone’s job

- **Distributors** must protect their customer’s brand as if it were their own and do their own due diligence
- **Suppliers** must ensure compliance with all regulations and oversee all factories
- **Everyone** is responsible for providing safe products that will not cause harm to the end user
  - Education and awareness are critical
When distributors become suppliers...

- A distributor who sources direct is a manufacturer
- A distributor who uses a contract decorator would also be considered a manufacturer
Remember 2007?
“All substances are poisons—the difference is in the dose.”

Paracelsus (1493-1541), a Swiss alchemist
2007: “Year of the recall”
2007: “Year of the recall”
2007: “Year of the recall”
2007: Big problem with the dose
2007: Big problem with the dose
Mattel’s recall timeline 2007

August 2:
Mattel voluntarily recalls 1.5 million Fisher-Price® toys – high levels of lead.

August 14:
Mattel voluntarily recalls a further 17.4 million products containing loose magnets easy for children to swallow (Mattel Play Sets and Barbie® Doll & Tanner).

September 4:
Mattel recalls another 850,000 toys due to lead paint contamination (Barbie® Accessory Sets, It's a Big Big World™ and GeoTrax™ Engines).

October 25:
Mattel voluntary recalls Go Diego Go!™ Rescue Boats coated in paint containing hazardous levels of lead.

November 6:
Mattel voluntarily recalls 155,000 Laugh & Learn™ and Learning Kitchen™ toys due to a choking hazard.
Consumer Product Safety Improvement Act Of 2008
Congressional response

• In August 2008, Congress passed the Consumer Product Safety Improvement Act (CPSIA)
Consumer Product Safety Commission (CPSC)

- Once a law, the CPSIA was turned over to the CPSC
- The CPSC is the Federal agency tasked with implementing and enforcing CPSIA
CPSIA focus

• Applies to all CPSC-regulated products
• Significant requirements for children’s products
  • Defines a child as 12 years and younger
• Specific requirements for:
  • Children’s products
  • Childcare articles
  • Children’s toys
If you sell children’s products, what must you do?
CPSIA requirements

• Third party testing mandatory:
  • Lead in substrate
  • Lead in paint and surface coatings
  • Some phthalates
• Children’s Product Certificate mandatory
• Tracking labels mandatory
• Makes previously voluntary standards mandatory
Lead in substrate

Substrate is the material of which something is made, and to which surface coating (i.e. paint) may be applied

- 100 ppm lead as of August 14, 2011
Lead paint rule

Decorated or scrapable surface coatings
- 16 CFR 1303 in effect since 1978 at 600 ppm
- As of August 14, 2009, sets limit at 90 ppm
Phthalates

- Applies only to children’s toys and child care products
- For all such products, DEHP, DBP, BBP – limit of 0.1%
- For all such products or any part of the product that can be placed in a child’s mouth: DINP, DIDP, DnOP – limit of 0.1% (interim prohibition)
- Applies to accessible materials only (before and after use and abuse testing)

- CPSC has issued a proposed rule that would expand the list of permanently banned phthalates as well as move DINP from the interim ban to a permanent ban
Ban on small parts

• Ban on small parts for products intended for children under 3
• Warning for toys and games intended for children between 3 and 6
• Warnings also for small balls, marbles, and balloons

⚠️ WARNING: CHOKING HAZARD - Small parts. Not for children under 3 years.
How can you ensure compliance? Ask for the CPC
Children’s Product Certificate (CPC)

• Importer or Domestic manufacturer is responsible for testing and certification
• All testing must be reflected in Children’s Product Certificate (CPC) or General Conformity Certificate (GCC)
• Must be produced and made available for every youth order
• Sample certificates on the CPSC website
Children’s Product Certificate (CPC)

Sample Children’s Product Certificate (CPC) Format From CPSC
This is the information required by the CPSC. There is no standard format for providing this information.

CHILDREN’S PRODUCT CERTIFICATE

1. Identification of the product covered by this certificate
2. Citation to each CPSC product safety regulation to which this product is being certified
3. Identification of the U.S. importer or domestic manufacturer certifying compliance of the product
4. Contact information for the individual maintaining records of test results
5. Date and place where this product was manufactured
6. Date and place where this product was tested for compliance with the regulation cited above
7. Identification of any third-party laboratory on whose testing the certificate depends
Look for a tracking label
Tracking Labels

• Required for all children’s products manufactured after August 14, 2009
• Enhance recall effectiveness
• Required information:
  • Manufacturer name
  • Month & year of manufacture
  • City & state of manufacture
  • Batch or internal order number
  • Contact information
Tracking Labels

- Must be permanent
  - Hangtags and adhesive labels not acceptable
- Supplier should include tracking label information
- Depending on changes made to the supplier’s product, distributor may need to include additional tracking label markings
Tracking Labels

• Example using the PPAI tracking label system:
  ps.ppa.org/SAMPLE003
Promotional Products Association International
Let’s talk apparel
What does this mean for apparel?

• Apparel is a significant product category and is clearly an area in which the distributor is often responsible for making material changes
• So, how do you ensure compliance in the decorating process?
What can you do?

- No need to change how you handle adult garment decorations
- Work with a screen printer who has tested all inks for children’s garments
- Rely on ink suppliers’ tests and component testing rule
- Perform third-party tests on finished product
- Look for PPAI best practices
Secondary Tracking Label

When a distributor sources from an apparel distributor, contracts with a third-party decorator to apply ink or thread to a garment, and sells the product, the garment has been altered and requires a second tracking label for the same purpose as the first...

- A secondary tracking label is still required for embroidered items even though most embroidery threads are exempt from testing.
Secondary Tracking Label

Required Information:

- Distributor’s (Decorator’s) name
- Month & year decoration was applied
- City & state where decoration was applied
- Decorator’s batch or internal order number
- Distributor’s contact information
Secondary Tracking Label
Best Practices

Label Location:
• Bottom hemline
• Inside back neck
• Sewn in as a label behind the original care/tracking label
Drawstrings

Short answer...no drawstrings in children’s upper outerwear

• Hood, neck and waist drawstrings on children's upper outerwear presents a substantial strangulation hazard (sizes 2T to 12 or equivalent)
• CPSC Final Rule on Drawstrings became effective in 2011, but CPSC has considered drawstrings in children’s outerwear to be a substantial product hazard for years. Several CPSC recalls per year.

• New York and Wisconsin have specific requirements, banning hood and neck drawstrings on all children’s clothing, but with limited exceptions for waist of upper and lower clothing drawstrings.
Avoiding undue influence and reasonable testing programs
Purpose

• Establish protocols and standards for ensuring continued testing of children’s products
• Material change requirements
• Safeguards against exercise of undue influence
• Establish program for labeling of consumer products
If you interact with a third-party testing lab, what must you do?

• Establish procedures to safeguard against the exercise of undue influence by the manufacturer on a third-party laboratory
  • Written policy
  • Training and retraining
  • CPSC notification of any attempt to hide or exert undue influence over test results
  • Staff assurances
Sample written policy

Product Guides

How To Read Compliance Documents

Text reports and compliance certificates are as complex as they are necessary. This instructional guide takes you step-by-step through the process of reading and understanding these reports.

Product Safety Communication Tool

Discusses campaign development and consumer product safety with your end buyer client with this helpful worksheet.

Product Safety, Social & Environmental Best Practices

This guide will provide you with direction and clarity in assessing and meeting product safety, social and environmental compliance challenges with self-assessment tools, best practices, checklists and frequently asked questions.

Guide To Navigating The CPSC

The 2012 Guide To Navigating The Consumer Product Safety Improvement Act is your one source for CPSCA information. This book covers everything from a definition of a children’s product, to standards and regulations, to specific supplier and distributor information and even answers to your most frequently asked questions.

Product Safety and Social Responsibility: Presentation

Learn more about international labor standards and environmental and social expectations with this comprehensive presentation.

PPAI Guide To Managing Responsibilities For Product Safety, Social & Environmental Standards

A guide to managing responsibility for product safety, social and environmental standards in the promotional products industry.

CPSC Small Business Guide

Guidance on the Consumer Product Safety Improvement Act (CPSIA) for small businesses, resellers, crafters and charismo.

CPSC Laboratory Test Manual for Toy Testing

Requirements for testing of toys and other articles intended for use by children 12 years and under.

Handbook For Manufacturers: Safe Consumer Products

The underlying premise of the Handbook is that safety must be designed into and built into consumer products in the United States in conformance with the requirements of product safety systems planned, established, and implemented at the direction of executive management.

California’s Proposition 65 Guidebook

Since its enactment more than 15 years ago, California’s Proposition 65 has distinguished itself as an unusual statute that requires the business community’s careful attention.

Resin Identification Codes

Under Influence Statement of Policy

Product Safety FAQ’s

Have questions? PPAI’s got answers. Find them here with PPAI’s searchable compilation of frequently asked questions regarding product safety and the CPSIA.

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Undue Influence Statement of Policy

STATEMENT OF POLICY

Our company has various responsibilities under the Consumer Product Safety Improvement Act (CPSIA) for ensuring children’s products meet the requirements of the CPSIA. Testing and certification of children’s products are important parts of the process of compliance. By law, we must apply undue influence on what the law calls “third party conformity assessment bodies” which are the testing laboratories we use to conduct the testing of children’s products, to produce favorable testing results for us.

The law does not provide a definition of “undue influence.” It is our company’s policy that any action or statement that undermines the credibility and validity of the testing process used for the certification of children’s products is undue influence. If you have any doubt, report it.

All reported incidents of possible undue influence will be promptly and fully investigated.

TRAINING

It is our company’s policy that we will train all employees who interact with testing laboratories to make certain no one engages in actions or makes statements that will be considered undue influence. If we change our undue influence policy, we are committed to retraining all employees regarding those changes.

In accordance with the requirements imposed upon us by the Consumer Product Safety Commission (CPSC), all employees who are trained will be required to sign a statement attesting to their training attendance.

PROCEDURE

If you witness or are aware of what you believe is an incident of undue influence, it is your responsibility to report it.

Every effort will be made to keep a report confidential, but remember, all of us have the responsibility to report undue influence, even though it may be difficult or uncomfortable to do so. Further, be assured, we will not tolerate any retaliation against you for reporting any incident or participating or cooperating with any investigation of an undue influence report.

You should report it to your immediate supervisor. If you are uncomfortable with reporting it to your supervisor for whatever reason (for example, that supervisor is involved in the incident of possible undue influence), (name, title, contact info) is the designated individual in our company for investigating any undue influence. You may also report an incident to any officer of the company if you feel that is the best course of action.
Obligation to exercise due care

• Applies to each domestic manufacturer or importer of a children’s product.
• The importer is not required to train employees of foreign manufacturers, but must be sure to exercise due care.
Obligation to exercise due care

• Train your factories in your policy and advise them that their acts of undue influence on labs may cause you to rely on their supplied test reports for CPCs that can be deemed invalid by the CPSC and bring liability to you as the “certifier” for failing to exercise due care in preventing undue influence in your supply chain.
Periodic testing

- Manufacturers must develop a Periodic Testing Plan to ensure continued compliance that includes:
  - Tests to be conducted
  - Intervals at which the tests will be conducted
  - Number of samples tested
- At minimum, periodic testing should be performed annually
Material change

• A material change includes changes in:
  • Product design
  • Manufacturing process
  • Sourcing of component parts
  • Tooling
  • Changes in manufacturing facility

• New certification testing will be required on the “new product”
Recordkeeping

- Children’s Product Certificate (CPC) for each product
- Records of each third party certification test
- Records of period tests
- Records of descriptions of all material changes
- Records of undue influence procedures—including training materials and training records of all employees
- These records must be kept for 5 years and may be maintained in languages other than English if they can be immediately provided to the CPSC and translated into English within 24 hours of a request by the CPSC
Consumer product labeling program

• MEETS CPSC SAFETY REQUIREMENTS
  • Label must be visible and legible
  • Product must comply with all applicable rules, bans, standards and regulations enforced by the CPSC
  • Additional labels may be added - Verbiage must not imply that the CPSC has tested, approved, or endorsed the product
  • This labeling is entirely optional
What worries me?
What worries me?

• A *juvenile imprint* can transform a “general use item” into a “children’s product”
What worries me?

• Discovering the intended audience can be difficult
What worries me?

- Distribution site often unknown to the manufacturer
What worries me?

• Far too often, test reports are out of date, based on wrong standards, incomplete or for a different product
How do you determine if something is a children’s product?
Marketing statements

Flash Drive for Kids on Amazon.com

At Amazon.com, we not only have a large collection of kids' flash drive products, but also a comprehensive set of reviews from our customers. Below we've selected a subset of kids' flash drive products and the corresponding reviews to help you do better research, and choose the product that best suits your needs.

Top Selected Products and Reviews

1. New Hello Kitty Crystal USB Flash Necklace Memory Drive 4gb by HelpStuff

   Currently unavailable...
   We don't know when or if this item will be back in stock.

   "Terrific..." - By Deal Dude
   I bought this for my grand-daughter, and...forget the flash drive! She wears it constantly because it is such a pretty piece of jewelry; it is well made, and a little girls delight! Plus, she always has a 4G flash drive in case the need arises...

2. BLACK super cute monkey USB flash drive 4GB by kopitch

   In Stock.
   Ships from and sold by Goods-cool.
   Price: $6.95

   "Cute!" - By Terri-Lynne Barton
Marketing statements
Product responsibility
Social responsibility
Environmental responsibility

Environmental Responsibility

Articles
Best Practices & Case Studies
Education
Guidelines
Product Responsibility
Social Responsibility

Best Practices & Case Studies
Compliance and green best practices as well as case studies. MORE »

FAQ’s
Frequently asked questions regarding environmental responsibility. MORE »

Education & Resources
Social and environmental compliance MORE »

Product Safety Awareness
The Product Safety Awareness Program is part of a larger PPAI initiative to create confidence in promotional products as an advertising medium at every level. MORE »

Product Safety Summit
Explore the product-safety issues currently impacting the promotional products industry, as well business implications and challenges associated with compliance. MORE »

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TurboTest*

Don't know where to start? This intuitive online roadmap will help you ascertain what rules, regulations and tests apply to your product.

PPAI TurboTest
a product safety roadmap

First, we'll gather more information about you and how you'd like to use this service.
TurboTest*

Don't know where to start? This intuitive online roadmap will help you ascertain what rules, regulations and tests apply to your product.

Progress: 32% Complete

PPAI TurboTest  a product safety roadmap

REGULATIONS FOR CHILDREN’S PRODUCTS

In its undecorated state, is the item generally considered a children’s product?

☐ Yes
☐ No
☐ I don't know

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888-I-AM-PPAI (426-7724)
A children's product is defined by the CPSIA as a consumer product designed or intended primarily for use by children 12 years of age or younger.

Is the item designed or intended primarily for use by children 12 years of age or younger?

☐ Yes
☐ No
☐ I don't know

CPSIA Factors To Determine Children's Products

1. Size and Shape: Will the dimensions of the product give a child the ability to use it properly?
2. Materials Used: Soft plastic, foam, plush and wood are child friendly; metal, glass and ceramic are not
3. Number of Parts: Consider physical and cognitive abilities necessary for the user
4. Motor Skills Required: Does it require fine or gross motor skills?
5. Classic Product: Does it maintain appeal over generations?
6. Colors: Bright, primary colors are more appealing to children
7. Cause & Effect: Product response—lights, sounds and movement are appealing to children
8. Sensory Elements: Does it appeal to all five senses?
9. Level of Realism/Detail: Does it have cartoonish details? Does it have childlike qualities?
10. Licensing/Theme: Does it contain cartoon images?

The CPSIA includes four factors to consider in determining if an item is a children's product:

1. A statement by a manufacturer about the intended use of such product, including a label on such product if such statement is reasonable
2. Whether the product is represented in its packaging, display, promotion, or advertising as appropriate for use by children 12 years of age or younger
3. Whether the product is commonly recognized by consumers as being intended for use by a child 12 years of age or younger
4. The Age Determination Guidelines issued by the Commission staff (http://www.cpsc.gov/BUSINFO/adg.pdf)
Notice of Required Certification Documentation:

When compliance to a product safety regulation is required, General Conformity Certificates (GCC) are required to show a product’s conformity to federal safety rules, bans, standards or regulations. GCCs are based on a test of the product or a “reasonable testing program.”

When third-party testing by a CPSC-recognized lab is required, Certificates of Compliance (COC) are required to show a product’s conformity to federal safety rules, bans, standards or regulations. COCs are based on testing done by a CPSC-recognized third-party laboratory.

Children's Products Regulations

For all children's products manufactured after August 14, 2011, compliance with total lead in substrate limit of 100 ppm in accessible component parts is required. For products manufactured before that date, the total lead in substrate limit is 300 ppm.

For all children's toys and child-care articles, compliance with the phthalate limit is required.

Yes: Tracking labels are required for all children's products manufactured as of August 14, 2009.
Yes: Lead in paint testing by accredited third-party laboratory required.
Yes: Testing by accredited third-party laboratory required for small parts ban.
Yes: Warning label for small parts required.
Yes: Compliance to ASTM F963 Standard Consumer Safety Specifications is required for all toys suitable for children under the age of 14.
Yes: Compliance with soluble limits for 8 heavy metals required.
Yes: Test for sharp points and edges required.
Yes: Third-party testing for mechanical safety is required.
Yes: Warning label for toy safety hazard required.
Yes: If the item is powered by electrical current from nominal 120 volt (110-125v.) branch circuits, third-party testing is required for labeling, manufacturing and performance standards.

Apparel Regulations

No: Third-party flammability testing required.
No: Accurate fiber content labeling required.
No: Appropriate care labeling required.
No: Optional testing on seam strength, seam slippage, bursting strength, tensile strength, fabric construction, pilling resistance, colorfastness recommended.
No: Third-party testing for flammability of children's sleepwear required.
Sample Completed General Certification of Conformity (CoC)
Manufacturer or importer completes this form—not the testing lab.

Be sure to compare the GCC against the test report.

Optional—Supplier or importer company logo

Certificate Number CA16327-24335L

Certificate of Compliance

Certificate Number

Imports number or description

 Imports number or description

CPSC governed regulations which may be applicable to product

CPSC governed regulations which may be applicable to product

U.S. importer or manufacturer certifying compliance

Importer certification compliance

Company Name
Street & Address
City, State, ZIP

Importers Declaration for test recent in adherence

Supplier’s or registration compliance

Company Name
Street & Address
City, State, ZIP
E-mail Address

Data product manufactured

Date product manufactured

City & country where product was manufactured

Date product was tested for compliance with below listed regulations

Lead in Substrate

1/10/2011

Lead in Substrate (16 CFR 1303.3) - Decoration

Lead in Substrate

1/10/2011

Lead in Surface Coating (16 CFR 1303) - Decoration

Does supplier acknowledge that the item is a children’s product? If the item becomes a children’s product based on the imprint, testing as a children’s product is recommended.

Must be a specific product—not a generic product or product line.

Best Practice: Supplier should provide a GCC for all products even if no regulations apply State “no applicable CPSC governed regulations”

A GCC lists only CPSC enforced regulations. For example, you are not required to list PDA regulations on this form.

Do not need to publicize factory name or address.

Different standards apply based on date of manufacture.

Optional—Provided by importer or testing lab.

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How To Read Compliance Documents

Testing lab name and address. Is this the same lab noted on the CPC?

Supplier or Importer contact information

If item is a toy, testing required for ASTM963. Compliance with that standard requires age-grading. Consult a test lab

Remarks reflect testing lab notes or manufacturer/importer directions to the lab

Does the test report include every test noted on the CPC?

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Test Report

123 Main Street
Any City, ST 54321


Client Contact Information

Promotional Product Company Name
Street Address
City, State
Zip
Country

Compliance Manager Name
Phone
Fax
E-mail

Your Product Information

Product Name(s):
Multi-Colored Beach Ball

Product Code, ISM, SKU or Style #:
P-ABC-1

Current Status:
Final Production

Product Description:
Multi-Colored Beach Ball

Age Grading:
All Ages

Country of Origin:
China

Country intended for Sale:
USA and Canada

Re-Test Status:
No

Changes made after the original test:
NA

Remarks:
1) Tests as per client’s request
2) Client requested to omit Tracking Label CPSIA Sect 103.
3) Client agreed to the omission of Producer’s Marking - Clause 7 of ASTM F963-08 as it is not available at the time of testing

Test Results Summary (see the following pages for additional details)

<table>
<thead>
<tr>
<th>Test</th>
<th>Result</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>ASTM F963-08 test</td>
<td>PASS</td>
<td>10 of 10 TESTS</td>
</tr>
<tr>
<td>CPSIA Section</td>
<td>PASS</td>
<td>3 of 3 TESTS</td>
</tr>
<tr>
<td>CPSIA Section 100</td>
<td>PASS</td>
<td>3 of 3 TESTS</td>
</tr>
</tbody>
</table>

Authorization
WHAT IS PRODUCT COMPLIANCE?
Why Should I Care About It?

Partner with a promotional products professional to ensure that the investment you have made in your brand will be both promoted and protected.

- Product responsibility is just smart business. Increasingly, your target audience wants assurances that products comply with environmental, social and product safety regulations and standards.

When regulations exist, compliance is required by law. It is vital that you communicate frankly with your promotional products partner to ensure you select the right product for your specific application.

What do I need to do?

Work with a qualified promotional products consultant and be sure to tell him or her:

☐ Who is the intended audience of your campaign?

☐ Will or could the items be distributed to children?

☐ How the products will be distributed?

☐ Where the products will be distributed?

☐ What kind of logo do you intend to use?

☐ Do you plan to distribute all the items or keep some for future events?

☐ Do your preferred products have child-like appeal or playful elements?

(Continued on reverse side.)

THE TRUTH ABOUT SOURCING DIRECT:
You may be saving a few dollars, but by sourcing direct, you may put yourself and your brand at risk in unexpected ways.

WHAT IS A CHILDREN’S PRODUCT?
- A consumer product designed or intended primarily for use by children 12 years of age or younger
- Products intended for this group require compliance to stricter standards and tests for certain chemicals such as lead, phthalates and product labeling
- Work with your promotional consultant to determine if your marketing campaign includes children’s products.
A quick word on Cal Prop 65
California Prop 65: The basics

• Officially called The Safe Drinking Water and Toxic Enforcement Act of 1986
• Purpose is to give consumers a chance to make an “informed decision” to protect them from exposure to chemicals
Cal Prop 65: The basics

• California’s Office of Environmental Health Hazard Assessment (OEHHA) must annually publish a list of chemicals known to cause cancer, birth defects or other reproductive harm.
  • List is approx. 900 chemicals now.
**Cal Prop 65: The basics**

- Once a chemical is listed by OEHHA, **companies have 12 months to comply** with warning requirements under the regulation.
Cal Prop 65: The basics

• Provide a “Clear and Reasonable Warning” before knowingly and intentionally exposing anyone to a listed chemical

**WARNING:** This product contains a chemical known to the State of California to cause cancer.

**WARNING:** This product contains a chemical known to the State of California to cause birth defects or other reproductive harm.
Cal Prop 65: An exposure regulation

• Methods of Exposure:
  • Oral
  • Inhalation
  • Transdermal
  • Hand-to-mouth
Cal Prop 65: An exposure regulation

• Measuring Exposure:
  • In most cases, exposure is measured in micrograms per day, based on average use of the product.
  • Very difficult and expensive to defend a claim, since burden is on maker.
Cal Prop 65: Enforcement

• State Attorney General’s Office enforces Prop 65; District Attorneys and City Attorneys can too

• Private Enforcers: any individual may bring an action to enforce.
  • Very prolific; vast majority of claims
Cal Prop 65: Enforcement

- Violations can be up to $2,500 per day/per violation;
  - private enforcers can enter into settlements and split $$ with State; the court approves and enters judgment against business owner.
- Any member of the supply chain can be subject to these penalties.
What can you do to comply?

• Check chemical list published and updated by the Office of Environmental Health and Hazard Assessment (OEHHA), and can be found at www.oehha.ca.gov

• Confirm with supplier or manufacture that none of the chemicals have been intentionally added

• Ask your customer if the product may be distributed in CA

• Ask for test reports

• Have products tested for “usual suspects”

• Apply warning label
We’re here to help...
AnneL@ppai.org or 972-258-3041
TimB@ppai.org or 972-570-3249
Brian.Coleman@UL.com or 404-277-4806