

Memo

Date: March 16, 2009
To: Peter Pereira, Episcopal Diocese of Hawaii
cc: Martha Im, Chancellor
From: Bradley Perkins, Deputy Vice Chancellor
Regarding: Affect of Changes in the Consumer Product Safety Improvement Act on Church Thrift Stores

Issue

In 2008, Congress made certain amendments to the Consumer Product Safety Improvement Act (CPSIA), which became effective on February 10, 2009. The CPSIA imposes significant rules and regulations over businesses and individuals who manufacture, import, distribute, donate, sell, and resell children's products, including clothes, toys, furniture, and carries. There is no exception for charities, including church thrift stores.

Summary

While resellers (including church thrift shops) of children's products are not exempt from the provision of the CPSIA, they are not required to test products for compliance with the CPSIA. However, such resellers may not knowingly resell such product that are subject to a recall, or contain toxic substances in excess of CPSIA limits.

Fortunately, the Consumer Product Safety Commission (CPSC) has published guidelines charitable thrift stores to aid them in making these determinations. If a church thrift shop follows these guidelines in good faith, the risk of citation by the CPSIA should be minimal.

In addition to liability for violating the CPSIA, thrift shops (and their churches) can still be held liable for other violations of local, city, state and federal laws, in addition to civil liability to those who are injured by products resold by such thrift shops. If a thrift shop is unsure about a donated item, it would be prudent to dispose of it, rather than reselling it. Donated products, whose resale would violate the CPSIA (including questionable products) should not be donated to others, including other thrift shops, but should be discarded in a safe manner.

The Consumer Product Safety Improvement Act

The CPSIA can be found at <http://www.cpsc.gov/ABOUT/Cpsia/legislation.html>. Additionally, the CPSC has published frequently asked questions (FAQs) about the CPSIA at <http://www.cpsc.gov/ABOUT/Cpsia/faq/faq.html>.

Guidance

The CPSC has published a *Guide to the Consumer Product Safety Improvement Act (CPSIA) for Small Businesses, Resellers, Crafters and Charities* (attached, and available at <http://www.cpsc.gov/ABOUT/Cpsia/smbus/cpsiasbguide.pdf>). The following are questions and answers from the guide regarding church thrift shops:

I run a small shop that sells new and used clothes, jewelry, shoes and toys for children. Do I need to test the products I sell?

No, you are not required to test. However, retailers and resellers (including those who sell on auction Web sites) cannot knowingly sell children's products that do not meet the requirements of the law. You can protect yourself by screening for violative products. But more importantly, as a business person, you

do not want to be selling products that have the potential to cause harm to anyone, especially a child. Sellers should avoid products likely to have lead, phthalates, or do not meet mandatory toy standards (see Table C for a general guide to commonly sold goods).

It is now against the law to sell a recalled product. Remember to check the list of recalled products on the CPSC web site (<http://www.cpsc.gov>) as a number of children’s products have been recalled.

How can I determine if something has lead in it before I sell it?

Resellers, in particular, need to make sound business decisions about the products they sell. As a practical matter, you must either:

- Test the product;
- Refuse to accept or sell the product, which will mean disposing of it if you already have it in your inventory;
- Use your best judgment based on your knowledge of the product; or,
- Contact the manufacturer about questionable products.

It would make sense to test, rather than discard, any suspect children’s products that have a high resale value. You may want to hire a qualified, trained person in your area who can quickly screen all of your suspect products with a handheld device called an X-Ray Fluorescence (XRF) machine.

You should not rely on commercially sold lead testing kits. CPSC staff have determined that the kits are prone to give “false positive” or “false negative” results.

Commonly Resold Children’s Products and Materials

Recalled Products.	Illegal to sell ANY recalled product (for adults as well as children). Before taking into inventory or selling a product, check the CPSC Web site for dangerous recalled products including cribs, play yards, strollers, high chairs, toys with magnets, toys that are choking hazards, and other products.
Books – “ordinary” children’s titles e.g. paperbacks and hardbacks.	OK to sell, if printed after 1985.
Cheap children’s metal jewelry.	Best to test, contact the manufacturer, or not sell.
Unpainted/untreated wood toys.	OK to sell.
Painted wooden or metal toys.	Best to test, contact the manufacturer, or not sell.
Toys with soft plastic that are made for Infants.	Should be OK to sell if made for sale after February 10, 2009. If older (or if the date of manufacture is unknown) check with manufacturer or do not sell.
Dyed or undyed children’s clothing made from natural, untreated cotton, silk, wool, hemp, flax, linen, and other untreated natural materials including coral, amber, feathers, fur and leather.	OK to sell.
Clothes with rhinestones, metal or vinyl snaps, zippers, closures or appliqués.	Best to test, contact the manufacturer, or not sell.
Surgical steel; precious metals such as gold (at least 10 karat) and sterling silver (at least 925/1000); precious and semiprecious gemstones (excluding a list of stones that are associated in nature with lead); natural or cultured pearls.	OK to sell.
Toys that are easily breakable into small parts including dolls and stuffed toys that have eyes, noses or other small parts that are not securely fastened.	Best not to sell (for children under 3); could present a choking hazard.

How can I tell if a product contains a prohibited phthalate?

As with lead, you are not required to test your products for phthalates or to certify that they do not contain prohibited phthalates. There is no easy way to tell whether a product contains a phthalate or what kind of phthalate it contains. Unlike lead where there is a reliable screening tool (the X-ray Fluorescence machine), there is not yet a screening device to detect the presence of phthalates.

Be wary of certain products: very soft vinyl or plastic toys (excluding latex or silicone), or other children's products where the plastic is soft enough to enable an infant to grasp it more readily, may contain phthalates. Your safest course is not to sell or accept these products unless you know they don't contain phthalates.

Can I sell vintage children's books and other children's products that are collectibles?

Yes. Used vintage children's books and other children's products sold as collector's items would not be primarily intended for children. Because of their value and age, they would not be expected to be used by children. Therefore, they do not fall into the definition of children's product and do not need to comply with the lead limits.

Do bikes that are not intended primarily for children 12 and under need to comply with the lead limits?

No. The lead limits in the CPSIA only apply to products intended or designed primarily for children 12 and under. The lead limits apply only to those bikes which by nature of their size, design or other similar factors indicate that they are intended or designed primarily for children. Thus, a bike with a 24" wheel size or smaller would generally be considered a children's bike and would need to comply.

What happens if I sell a product in violation of the CPSIA or other applicable laws?

The Commission's response to a violation of the law varies depending upon the circumstances, including the nature of the product defect, the number of products, the severity of the risk of injury associated with the product and the type of violation. The Commission's goal is to help you to avoid future violations and protect your customers, not to put you out of business.

Attachment: *Guide to the Consumer Product Safety Improvement Act (CPSIA) for Small Businesses, Resellers, Crafters and Charities*



Guide to the Consumer Product Safety Improvement Act (CPSIA) for Small Businesses, Resellers, Crafters and Charities

This information was prepared by CPSC staff, has not been reviewed or approved by, and many not necessarily reflect the views of, the Commission. It may be subject to change based on Commission action.



Introduction

The Consumer Product Safety Improvement Act (CPSIA) is a sweeping new law that impacts a broad spectrum of our economy. From manufacturers of toys to the kids that play with them, everyone is affected in some way -- even those who make and donate products to hospitals and charities.



There are new rules to be understood and adopted for everyone from the largest global manufacturer to the crafter working in the family workshop to the mom-and-pop shop on the corner. Indeed, all children's products including toys, books, child care articles and clothing are covered in different ways by this law, and there are different rules for different products.



Although the information here does not speak to every aspect of the law, it does address some of the more frequently asked questions that many small manufacturers, shop owners and consignment/thrift store owners have asked about the CPSIA. New information is coming out frequently, so sign up today to receive [e-mail updates](#).



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Guidance for Small Manufacturers, Importers and Crafters of Children's Products

Question 1: Who is considered to be a manufacturer?

Anyone who makes, produces or assembles a product is considered to be a manufacturer. If what you make is sold or donated, something as simple as adding ribbons to hair clips, knitting hats, or stringing beads into necklaces makes you a manufacturer. Under the law, importers are also considered to be manufacturers and must meet the same requirements.



Question 2: I work part-time in my home making clothes and toys for kids. Am I affected by this law?

Yes, the law covers all manufacturers and importers -- large and small, domestic and foreign. All businesses, including handmade toy and apparel makers, crafters, those making charitable donations, and other small business must take appropriate steps to be sure that their products conform to all aspects of the law and safety standards, including the new lead content and phthalates limits (for more on *phthalates*, see question #10) and mandatory toy standards.

Question 3: What is a children's product?

A children's product is one designed or intended primarily for children 12 years of age or younger. Toys, clothes, furniture, books, jewelry, blankets, games, CDs/DVDs, strollers, and footwear may all be considered children's products.

In determining whether a consumer product is "intended primarily" for a child 12 years of age or younger, the following factors will be considered:

- A statement by the manufacturer about the intended use of the product, including a label on the product, if such statement is reasonable.
- Whether the product is represented in its packaging, display, promotion or advertising as appropriate for use by children 12 years of age or younger.
- Whether the product is commonly recognized by consumers as being intended for use by a child 12 years of age or younger.
- The [Age Determination Guidelines](#) issued by Commission staff.

If a product is intended for adults or for general use by consumers of all ages, then it is not intended primarily for children. Products marketed and priced in a manner that would not make them appropriate for use by a child would also not be intended primarily for children. An example would be an expensive telescope -- because it is sold for general use by all ages, it is not a children's product even though it can be used by a child on occasion.

Question 4: Do all children's products require testing? What requirements do I need to meet?

Manufacturers must be aware of all the standards and testing requirements of the law and take appropriate steps to ensure that they meet not only the current requirements, but also are preparing themselves and their products to meet future requirements (see Table A). As an example, children's products that are painted are subject to both lead paint and lead content limits, though at this time, testing is not required for lead content but it is for lead paint. It should be noted that manufacturers must already be testing and certifying for lead in paint, as well as standards for small parts, cribs and pacifiers.

Table A: Compliance and Testing Timetable

	When do products need to comply?	When is testing and certification enforced/required?
Lead in Paint: Limit of 600 parts per million (ppm)	Now	Now
Limit drops to 90 ppm	August 14, 2009	August 14, 2009
Children's Metal Jewelry: Lead content limit of 600 ppm	Now	March 20, 2009*
Total Lead Content: Limit of 600 ppm	Now	February 10, 2010*
Limit drops to 300 ppm	August 14, 2009	February 10, 2010*
Limit drops to 100 ppm (if technologically feasible)	August 14, 2011	August 14, 2011*
Certain phthalates limit of 0.1% (of total weight) in toys and child care articles	Now	February 10, 2010*
Mandatory Toy Standard (ASTM F963), which relates to safety requirements, labeling, and testing for: hazards caused by magnets; certain toxic substances; toys with spherical ends; hemispheric-shaped objects; cords, straps, and elastics; battery-operated toys; and more.	Now (for new production only)	February 10, 2010*
Cribs and Pacifiers	Now	Now
Small Parts (products for children under 3)	Now	Now
Baby Bouncers, Walkers and Jumpers	Now	February 10, 2010

* Testing and certification are not required for products already **in inventory** that are covered by the new lead and phthalate limits and toy standards.

Note: The enforcement of the requirement for a **general certificate of conformity** for non-children's products will resume on February 10, 2010. The Commission will be issuing additional information on this topic prior to that date.



Question 5: For testing and certification of children’s products that are required now (for example, lead paint and small parts), what do I need to do?

Where testing is required, manufacturers and importers of children’s products must test their products using a third-party [accredited testing lab](#).

It is prudent for manufacturers to develop a quality assurance program to ensure products meet safety standards. This may include screening raw materials and sub-components, so that as final products are produced, there is a greater likelihood of them meeting standards and being certified by a testing lab. For lead paint and lead content, an X-Ray Fluorescence (XRF) machine (used by a trained, qualified person) is a possible method to determine if a component has lead, but note that XRF is not a replacement for a third-party test.

Manufacturers and importers must comply with certificate requirements (a [sample certificate](#) is available on CPSC’s Web site), which is the documentation that shows that the product has been tested and meets appropriate standards. The certificate must accompany the product(s) either in paper or electronic form. The Commission intends to initially focus enforcement efforts on compliance with the underlying safety rules, rather than on the certificate or form of the certificate itself.

Question 6: If I make multiple units of the same thing, do I have to have every single product tested?

No. If your products need to be tested (see Table A), and they are materially identical and made in the same fashion with no change in assembly, equipment used, etc., then a single sample may be all that is necessary for testing purposes. A change in materials or design can be enough to alter testing results.

Question 7: When testing and certification are not yet required (for example, lead content and phthalates), what do I need to do?

For these standards, no third-party testing or certificate is needed before February 10, 2010; however, manufacturers must still ensure their products meet the requirements of the law. There are several things manufacturers can do to be highly confident that their products are compliant:

- Get to know your product and the laws and regulations that affect you. Know what is and is not required of you and your products. These requirements can change.
- Develop sound business processes that put safety (and meeting safety standards) first.
- Although there may be no requirement to test and certify, you may choose to do so in the context of a quality assurance program, which ensures products will meet the requirements of the law. This may include testing raw materials, components and final products. This will also make it easier for you to meet the mandatory third-party testing and certification requirements when they become effective. For lead content testing, one solution would be to hire a qualified, trained person who can quickly screen all of your raw materials and finished products with a handheld device called an X-Ray Fluorescence (XRF) machine.
- If you choose not to test, ask your suppliers about the chemical/material content of their products. Seek out materials that will enable you to produce products that are in compliance.

Question 8: Are there exemptions/exclusions to meeting the lead content limits?

CPSC is currently working to determine exemptions to the lead content limits and the requirement to test. In the interim, until the Commission issues final rules in these areas, certain materials can be used in making products or be sold as children's products without risk of sanction or penalties by the Commission provided the manufacturer, distributor or seller does not have actual knowledge that the products have more than the acceptable lead limit. The Commission generally will not prosecute someone for making, selling or distributing items in these categories (see Table B) even if it turns out that such an item actually contains more than 600 ppm lead.

Sellers will not be immune from prosecution if CPSC's Office of Compliance finds that someone had actual knowledge that one of these children's products contained more than 600 ppm lead or continued to make, import, distribute or sell such a product after being put on notice. Agency staff will seek recalls of violative children's products or other corrective actions, where appropriate.

Question 9: What do I do if I learn that one of the products I make or sell does not comply with the lead limits, phthalate limits or toy standards?

Under section 15(b) of the Consumer Product Safety Act, companies must immediately tell the Commission if they learn of a children's product that violates the law or has a defect that may present a product hazard. You can [report a potentially defective or hazardous product](#) on CPSC's Web site.

Table B - These materials or components can be used (separately or in combination) and sold (provided they have not been treated or altered or undergone any processing that could result in the addition of lead):

<ul style="list-style-type: none">• Wood• Other natural materials including coral, amber, feathers, fur, and untreated leather• Yarn, dyed or undyed• Dyed or undyed textiles (cotton, wool, hemp, nylon, etc.), including children’s fabric products, such as baby blankets, and non-metallic thread and trim. This <u>does not</u> include products that have rhinestones or other ornaments that may contain lead or that have fasteners with possible lead content (such as buttons, metal snaps, zippers or grommets).• Children’s books printed after 1985 that are conventionally printed and intended to be read, as opposed to used for play• Certain educational materials, such as chemistry sets• Precious gemstones: diamond, ruby, sapphire or emeralds• Semiprecious stones provided that the mineral or material is not based on lead and is not associated with any mineral based on lead• Natural or cultured pearls• Surgical steel• Gold, of at least 10 karats• Silver, at least 925/1000 pure• Platinum, palladium, rhodium, osmium, iridium, and ruthenium
<p>The Commission has provided limited exclusions for products containing component parts that contain lead in excess of the 600ppm limit; specifically:</p> <ul style="list-style-type: none">• Components that are <u>not accessible</u>, that is cannot be reached by a small child’s finger or tongue. Paint and other coatings or electroplating are not considered barriers that make a component inaccessible.• Components of <u>electronics devices</u> intended for children that cannot be made inaccessible and cannot currently be made with a lead level that meets the limit.

Question 10: What are phthalates?

Phthalates are a group of chemicals (oily, colorless liquids) that are used, among other things, to make vinyl and other plastics soft and flexible. Many types of phthalates are in use today. As of February 10, 2009, three have been prohibited outright in the United States for use in certain products and three more are prohibited pending further action by the Commission.

**Question 11: What products are covered by the prohibition on the use of phthalates?**

Three phthalates, DEHP, DBP, and BBP, have been permanently banned in concentrations of more than 0.1% in “children’s toys” or “child care articles.”

- A “children’s toy” is a product intended for a child 12 years of age or younger for use when playing. General use balls, bath toys/bath books, dolls and inflatable pool toys are examples of toys that are covered by the law and might contain phthalates. Bikes, playground equipment, musical instruments, and sporting goods (except for their toy counterparts) are not considered toys and therefore not affected by the ban.
- A “child care article” is a product that a child 3 years of age or younger would use for sleeping, feeding, sucking or teething. Bibs, child placemats, child utensils, feeding bottles, cribs, booster seats, pacifiers and teethingers are child care articles that are covered by the law and might contain phthalates.

Three additional phthalates, DINP, DIDP, and DnOP, have been prohibited in concentrations of more than 0.1% pending further study and review by the Commission and a group of outside experts. This interim prohibition applies to: (a) child care articles, and (b) toys that can be placed in a child’s mouth or brought to the mouth and kept in the mouth so that it can be sucked or chewed (for example: squeeze toys, teethingers, bathtub toys and uninflated pool toys).

Question 12: Does the packaging of a product have to comply with the phthalates ban?

The CPSIA defines children’s toys as consumer products designed or intended for use by children 12 and under when playing. Packaging is generally not intended for use by children when they play, given that most packaging is discarded and is not used or played with as a children’s toy or child care article. However, if the packaging is intended to be reused, or used in conjunction with a child care article or with a children’s toy while playing, such as a heavy-gauge reusable bag used to hold blocks, it would be subject to the phthalates ban.

Question 13: I donate the children’s products that I make to local charities and hospitals. Can I continue to send them my handmade donations?

Yes, you can make and donate children’s products to local charities and hospitals, if they are made of exempted materials or materials that you feel confident do not contain lead (see Table B). Children’s products made of yarn, dyed or undyed fabrics and natural materials such as untreated wood or cotton do not contain lead at levels sufficient to exceed the new lead limits.

If your products are made for children 12 and under, they will need to be third-party tested if you use [paint or a similar surface coating](#). Products for children under 3 will need to be tested to the [small parts standard](#) if you create a product (such as a toy, puzzle or doll) that could break into small pieces when used, dropped or otherwise handled by a child.

Avoid making and donating children’s products with soft vinyl or plastic, buttons or zipper pulls, or metal jewelry or embellishment or other pieces that may exceed the lead or phthalates limits.



Guidance for Retailers and Resellers of Children’s Products, including Thrift Stores, Consignment Shops and Charities

Question 14: I run a small shop that sells new and used clothes, jewelry, shoes and toys for children. Do I need to test the products I sell?



No, you are not required to test. However, retailers and resellers (including those who sell on auction Web sites) cannot knowingly sell children’s products that do not meet the requirements of the law. You can protect yourself by screening for violative products. But more importantly, as a business person, you do not want to be selling products that have the potential to cause harm to anyone, especially a child. Sellers should avoid products likely to have lead, phthalates, or do not meet [mandatory toy standards](#) (see Table C for a general guide to commonly sold goods).

It is now against the law to sell a recalled product. **Remember to check the list of recalled products** on the CPSC web site as a number of children’s products have been recalled.

Question 15: How can I determine if something has lead in it before I sell it?

Resellers, in particular, need to make sound business decisions about the products they sell. As a practical matter, you must either:

- Test the product;
- Refuse to accept or sell the product, which will mean disposing of it if you already have it in your inventory;
- Use your best judgment based on your knowledge of the product; or,
- Contact the manufacturer about questionable products.



It would make sense to test, rather than discard, any suspect children’s products that have a high resale value. You may want to hire a qualified, trained person in your area who can quickly screen all of your suspect products with a handheld device called an X-Ray Fluorescence (XRF) machine.

You should not rely on commercially sold lead testing kits. CPSC staff have determined that the kits are prone to give “false positive” or “false negative” results.

Table C: Commonly Resold Children’s Products and Materials

Recalled Products	Illegal to sell ANY recalled product (for adults as well as children). Before taking into inventory or selling a product, check the CPSC Web site for dangerous recalled products including cribs, play yards, strollers, high chairs, toys with magnets, toys that are choking hazards, and other products.
Books – “ordinary” children’s titles e.g. paperbacks and hardbacks	OK to sell, if printed after 1985
Cheap children’s metal jewelry	Best to test, contact the manufacturer, or not sell
Unpainted/untreated wood toys	OK to sell
Painted wooden or metal toys	Best to test, contact the manufacturer, or not sell
Toys with soft plastic that are made for infants	Should be OK to sell if made for sale after February 10, 2009. If older (or if the date of manufacture is unknown) check with manufacturer or do not sell
Dyed or undyed children’s clothing made from natural, untreated cotton, silk, wool, hemp, flax, linen, and other untreated natural materials including coral, amber, feathers, fur and leather	OK to sell
Clothes with rhinestones, metal or vinyl snaps, zippers, closures or appliqués.	Best to test, contact the manufacturer, or not sell
Surgical steel; precious metals such as gold (at least 10 karat) and sterling silver (at least 925/1000); precious and semiprecious gemstones (excluding a list of stones that are associated in nature with lead); natural or cultured pearls	OK to sell
Toys that are easily breakable into small parts including dolls and stuffed toys that have eyes, noses or other small parts that are not securely fastened	Best not to sell (for children under 3); could present a choking hazard

Question 16: How can I tell if a product contains a prohibited phthalate?

As with lead, you are not required to test your products for phthalates or to certify that they do not contain prohibited phthalates. There is no easy way to tell whether a product contains a phthalate or what kind of phthalate it contains. Unlike lead where there is a reliable screening tool (the X-ray Fluorescence machine), there is not yet a screening device to detect the presence of phthalates.

Be wary of certain products: very soft vinyl or plastic toys (excluding latex or silicone), or other children's products where the plastic is soft enough to enable an infant to grasp it more readily, may contain phthalates (see Question 11). Your safest course is not to sell or accept these products unless you know they don't contain phthalates.

Question 17: Can I sell vintage children's books and other children's products that are collectibles?

Yes. Used vintage children's books and other children's products sold as collector's items would not be primarily intended for children. Because of their value and age, they would not be expected to be used by children. Therefore, they do not fall into the definition of children's product and do not need to comply with the lead limits.

Question 18: Do bikes that are not intended primarily for children 12 and under need to comply with the lead limits?

No. The lead limits in the CPSIA only apply to products intended or designed primarily for children 12 and under. The lead limits apply only to those bikes which by nature of their size, design or other similar factors indicate that they are intended or designed primarily for children. Thus, a bike with a 24" wheel size or smaller would generally be considered a children's bike and would need to comply.

Question 19: What happens if I sell a product in violation of the CPSIA or other applicable laws?

The Commission's response to a violation of the law varies depending upon the circumstances, including the nature of the product defect, the number of products, the severity of the risk of injury associated with the product and the type of violation. The Commission's goal is to help you to avoid future violations and protect your customers, not to put you out of business.

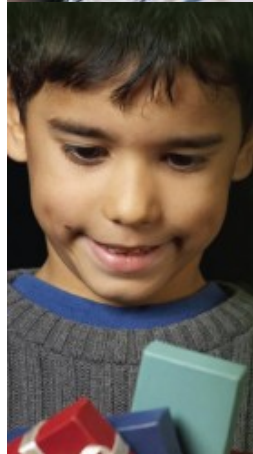


For more information:

- Check our [full list of Frequently Asked Questions](#) on the CPSIA
- [CPSC's Small Business Information](#)
- [Recall Information](#)
- [Age Determination Guidelines](#) (pdf)
- [Sample Certification](#) (pdf)
- [Accredited Testing Labs](#)
- [Sign-up for E-mail Alerts on the CPSIA](#)
- [Submit a question on CPSIA](#)

Links to other statutes under CPSC jurisdiction, which may affect you:

- [Consumer Product Safety Act](#)
- [Federal Hazardous Substances Act](#)
- [Virginia Graeme Baker Pool and Spa Safety Act](#)
- [Flammable Fabrics Act](#)
- [Poison Prevention Packaging Act](#)
- [Refrigerator Safety Act](#)
- [Children's Gasoline Burn Prevention Act](#)





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