



Consumer Product Safety Improvement Act 2008
-Component Testing Fact Sheet-

In late 2011 the Consumer Product Safety Commission issued a Final Rule (CFR Vol. 76 No. 216) allowing the use of component testing to comply with the testing and certification requirements of the Consumer Product Safety Improvement Act of 2008 (CPSIA). This Final Rule was codified in 16 CFR 1109 - *Conditions and Requirements for Relying on Component Part Testing or Certification, or Another Party's Finished Product Testing or Certification, to Meet Testing and Certification Requirements*.

It is important to note that CPSC indicates in the 16 CFR 1109.5 - *Conditions, requirements, and effects generally* that "any party, including a component part manufacturer, a component part supplier, a component part certifier, or a finished product certifier, may procure component part testing as long as it complies with the requirements in this section and subparts B* and C** of this part."

In the Final Rule CPSC defines a *Component part* as any part of a consumer product, including a children's product that either must or may be tested separately from a finished consumer product to assess the consumer product's ability to comply with a specific rule, ban, standard, or regulation enforced by the CPSC. Within the same consumer product, the component parts to be tested and the tests to be conducted may vary, depending on the applicable regulations and required test methods, if any. At present, the CPSC has not identified a specific compliance test method to be used for lead content determination in printing inks.

In 16 CFR 1109.5 (d) *Test Method and Sampling Protocol* specifies the testing and sampling protocols. In 16 CFR 1109.5(d)(1) CPSC indicates that "all testing is done using required test methods, if any" CPSC specifies the following test methods for lead content determination in non-metal children's products:

- CPSC-CH-E1002-08, February 1, 2009
- CPSC-CH-E1002-08.1, June 21, 2010
- CPSC-CH-E1002-08.2, April 10, 2012

Please note that none of these test methods is suitable for use for lead (Pb) content determination with a finished ink of any type or any type of ink raw material.

If requested for this data from a customer an agreement should be reached on what test method is to be used to provide the data. As noted above, input raw material data can be used for this purpose.

It is also important to note that the CPSIA 2008 third party testing and certification requirements do not apply to inks used on any type of paper or cardboard substrate or to CMYK process inks.

* Conditions and Requirements for Specific Consumer Products, Component Parts, and Chemicals (16 CFR 1109.11; 1109.12 and 1109.13)

** Conditions and Requirements for Composite Testing (16 CFR 1109.21)