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In August 2008, President Bush signed into law the Consumer Product Safety Improvement Act (CPSIA), which requires manufacturers of domestic and imported children's products, including books and other printed products, to test and certify their products to ensure they meet specific lead and phthalate (e.g., plasticizers that could be found in inks, coatings, and adhesives) content limits established by the CPSIA. There are three key compliance dates and the first one, November 12, 2008, has triggered many questions and requests by print customers for certification statements from printers. This first compliance date has resulted in a misunderstanding by many printer customers of the CPSIA's requirements regarding certification.

The first date of November 12, 2008 is for the general conformity certification of existing CPSC requirements and does not apply to children's products including books and other articles made from paper. Therefore, there is no general conformity certification due at this time.

The second date of December 21, 2008 is for testing the lead content in paint, including paint used on children's products. The CPSIA establishes limits for the amount of lead in paint. It is important to understand that printing inks are not considered "paint" by the Consumer Product Safety Commission (CPSC) and thus are NOT subject to the lead paint testing requirements that go into effect December 21, 2008.

The third date of February 10, 2009 does affect children's products made from paper, as it will limit the total lead content in children's products to no more than 600 parts-per-million (ppm) and prohibit the manufacture and sale of children's toys containing more than 0.1% of certain phthalates. It also requires manufacturers of children's products to test and certify their products. The lead content limit will lower to 300 ppm beginning August 14, 2009. The CPSIA defines a "children's product" as a "consumer product designed or intended primarily for children 12 years of age or younger." The legislation, therefore, has the potential to affect a broad range of children's printed good products, such as books, menus, certain toys packaging, etc.

In the event that you are being asked about certification by your customers, the attached letter is provided that can be used to send to your customer that will help explain the current and future requirements. Right now, it is important to understand that no testing or certification is required for books or other printed matter.

While the Printing Industries of America supports the intention of the CPSIA, there are many questions about the specifics of this new requirement and we are working with several leading book printers and other trade organizations, including the American Association of Publishers and the National Association of Printing Ink Manufacturers, to get answers to these questions. It is the goal of this group to demonstrate to the CPSC that the majority of children's printed good products do not pose a health hazard to children, and as such do not require product testing and certification under the CPSIA. If an exemption is not provided, one of the key questions is to clarify the extent and nature of the testing and certification that will be required for all products sold or distributed (including products from inventory) on or after February 10, 2009. It is not clear if testing of component materials, final products, or both will be required to demonstrate compliance with the new lead and phthalate standards. Additionally, to the best of our knowledge, the CPSC has not accredited any third party organizations to perform the scope of testing required by the CPSIA.

The full legislative language and frequently asked questions regarding the CPSIA can be found at: <http://www.cpsc.gov/ABOUT/Cpsia/legislation.html#summaries>

If you have any questions regarding the CPSIA, please contact Gary Jones at 412-259-1794 or [gjones@printing.org](mailto:gjones@printing.org), Rick Hartwig at 412-259-1792 or [rhartwig@printing.org](mailto:rhartwig@printing.org), or Christopher Dugan at 412-259-1794 or [cdugan@printing.org](mailto:cdugan@printing.org).

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