



**PRINTING
INDUSTRIES
OF AMERICA**

Advancing Graphic Communications

What To Do Now About The Consumer Product Safety Improvement Act of 2008

Since the Printing Industries of America first reported on the Consumer Product Safety Improvement Act (CPSIA) in November 2008, there have been many changes that affect what a printer needs to do in order to comply with the law's lead and phthalate limit, testing and certification requirements. This sheet summarizes the current requirements for printers and approaches that can be taken to meet the current requirements.

What the Law Requires

As of February 10, 2009, printers can not legally manufacture, distribute, or sell any new or existing children's product unless it meets specific limits for lead and if the book has "play value", specific limits for phthalates (chemicals used to keep plastics soft). The current lead and phthalate limits are as follows:

- Lead - 600 parts per million. On August 14, 2009 the limit drops to 300 parts per million.
- Phthalate – Permanent limit of 0.1% for di-(2-ethylhexyl) phthalate (DEHP), dibutyl phthalate (DBP), or benzyl buty phthalate (BBP) and interim limit of 0.1% for diisononyl phthalate (DINP), diisodecyl phthalate (DIDP), or di-n-octyl phthalate (DnOP).

Unless a permanent exemption is granted, on February 10, 2010, printers will be required to test and certify their children's products meet the lead and phthalate limits. Click [here](#) for a summary of the testing and certification requirements.

Which Printing Input Materials Can Contain Lead and Phthalates?

Lead is a heavy metal that is not deliberately added to any input material used to make printed products. Lead is a heavy metal that can be found in trace amounts in nearly all natural and man-made materials, including all of the materials used to manufacture printed children's products. Trace quantities of lead can be found in paper, inks and coatings, and bindery materials (e.g., adhesives, staples, coils, etc) are all materials that are now regulated under the CPSIA and the testing data collected so far shows that no products tested exceed the thresholds established by the new law.

Phthalates are plasticizers, or compounds that soften plastic materials and make them more pliable. In the graphic arts industry, phthalates can be found in plastic substrates, plastic coils, inks, coatings, and adhesives. The testing data collected so far shows that no products tested exceed the thresholds established by the new law.

What the Printer Should Do Now

Printers need to ensure that the lead and phthalate limits are being met and have the following options:

- Supplier Testing Data – Printers can rely upon input material testing data provided by their suppliers. A "certified statement" alone may NOT be enough. Any statement issued by a material supplier needs to be supported by testing data. The printer needs to know and understand the vendor's basis for the certified statement.

NOTE: Material Safety Data Sheets (MSDS's) do not provide the necessary data needed for compliance with the limits.

- XRF Screening – Printers can either purchase or send their products to a lab that uses an x-ray fluorescence instrument. This technique is limited to lead content testing only and any product showing an exceedance needs additional physical testing.
- Third Party Product Testing – Printers can send products to any testing laboratory capable of performing **Total Lead and Phthalate Content Testing** of the complete finished product. The test must be based on “acid digestion” of the sample.

Where Can My Products Be Tested?

Currently, printers can send their raw materials or finished products to any testing laboratory that performs acid digestion testing. Beginning February 10, 2010, printers will be required to send their finished products to a laboratory accredited by the CPSC. To date, The CPSC has not accredited any laboratory to conduct total lead content testing; the CPSC has, however, accredited a number of laboratories for a similar lead-in-paint standard. The CPSC’s list of labs accredited under the lead-in-paint standard is located at <http://cpsc.gov/cqi-bin/labapplist.aspx>. A number of laboratories accredited to test for the amount of lead-in-paint have indicated their intent to become accredited to test for the total lead content of children’s products and toys.

Are Specific Tests Required?

Yes. All tests need to determine the *total* lead and/or phthalate content of the children’s product or toy. Soluble lead and phthalate testing data cannot be used to demonstrate compliance with the Act’s requirements. American Society for Testing and Materials’ test methods E1645-01 and E1613-04 should be used to determine the total lead content of a children’s product until such time the CPSC issues a standard operating procedure for lead testing. The CPSC’s test method and standard operating procedure for total phthalate testing is located at www.cpsc.gov/about/cpsia/phthalatesop.pdf. The operating procedure permits the use of ASTM D 7083-04 and EPA 8061 test methods as alternatives to the CPSC’s phthalate testing operating procedure.

Take Action

Use Printing Industries' online [Action Alert](#) to customize and send an e-fax to legislators and the CPSC urging them to consider the impacts of the CPSIA on the printing and graphic communications industry.

Additional Information

Brief summaries of the changes and other supporting information can be found on the Printing Industries of America’s CPSIA website at www.printing.org/cpsia. Please contact Gary Jones at 412-259-1794 or gjones@printing.org.