

Exhibit 1

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of)	
)	
AMAZON.COM, INC.)	
)	
)	CPSC DOCKET NO.: 21-2
)	
Respondent.)	

**DECLARATION OF JOHN EUSTICE IN SUPPORT OF COMPLAINT COUNSEL’S
MOTION FOR SUMMARY DECISION**

I, John Eustice, hereby declare:

1. I am Complaint Counsel in the above-captioned matter.
2. I am over the age of 18 and I am competent to make this Declaration.
3. Attached to this Declaration as Exhibit A is a true and correct copy of Respondent’s Objections and Responses to Complaint Counsel’s First Set of Interrogatories.
4. Attached to this Declaration as Exhibit B is a true and correct copy of a January 24, 2020, Notice of Violation to Gan Jian DBA Taiycyxgan, relating to the Taiycyxgan Little Girl’s Coral Fleece Bathrobe Unisex Kids Robe Pajamas Sleepwear. CPSC_AM0000349-352.
5. Attached to this Declaration as Exhibit C is a true and correct copy of a November 3, 2020, CPSC Notice of Violation to Amazon’s Corporate Counsel, Genus Heidary, relating to the Taiycyxgan Little Girl’s Coral Fleece Bathrobe Unisex Kids Robe Pajamas Sleepwear. CPSC_AM0000515-519.
6. Attached to this Declaration as Exhibit D is a true and correct copy of a February 21, 2020, Notice of Violation to Wang Bo of IDGIRLS, courtesy copying Amazon, relating to the IDGIRLS Kids Animal Hooded Soft Plush Flannel Bathrobes for Girls Boys Sleepwear. CPSC_AM0000770-773.

7. Attached to this Declaration as Exhibit E is a true and correct copy of a November 3, 2020, Notice of Violation to Amazon's Corporate Counsel, Genus Heidary, relating to the IDGIRLS Kids Animal Hooded Soft Plush Flannel Bathrobes for Girls Boys Sleepwear. CPSC_AM0000790-794.

8. Attached to this Declaration as Exhibit F is a true and correct copy of a March 17, 2020, Notice of Violation to Anhui Meiyong Fushi Co., LTD. DBA Docevida and Home Swee, courtesy copying Amazon, relating to the Home Swee Boy's Plush Fleece Robe Shawl Skull and Hooded Spacecraft Printed Soft Kids Bathrobe for Boy. CPSC_AM 0000927-931.

9. Attached to this Declaration as Exhibit G is a true and correct copy of a November 3, 2020, Notice of Violation to Amazon's Corporate Counsel Genus Heidary, relating to the Home Swee Boy's Plush Fleece Robe Shawl Skull and Hooded Spacecraft Printed Soft Kids Bathrobe for Boy. CPSC_AM0001077-1081.

10. Attached to this Declaration as Exhibit H is a true and correct copy of a March 17, 2020, Notice of Violation to Zaoxing Fan of HOYMN, courtesy copying Amazon, relating to the HOYMN Little Girl's Lace Cotton Nightgowns, Kids Long-Sleeve Sleep Shirts Princess Sleepwear for Toddlers 2-15 Years. CPSC_AM0000624-628.

11. Attached to this Declaration as Exhibit I is a true and correct copy of a November 3, 2020, Notice of Violation to Amazon's Corporate Counsel, Genus Heidary, relating to the HOYMN Little Girl's Lace Cotton Nightgowns, Kids Long-Sleeve Sleep Shirts Princess Sleepwear for Toddlers 2-15 Years. CPSC_AM0000672-676.

12. Attached to this Declaration as Exhibit J is a true and correct copy of sample procurement records for the purchase of samples of the Subject Product children's sleepwear garments. CPSC_AM0009488, CPSC_AM0009489-9499, CPSC_AM0009500-9501,

CPSC_AM0009502-9509, CPSC_AM0009510, CPSC_AM0009511-9518, CPSC_AM0009519,
CPSC_AM0009520-9528, CPSC_AM0009529-9530, CPSC_AM0009531-9539,
CPSC_AM0009540, CPSC_AM0009541-9546, CPSC_AM0009547, CPSC_AM0009548,
CPSC_AM0009549-9550, CPSC_AM0009551-9552, CPSC_AM0009557.

13. Attached to this Declaration as Exhibit K is a true and correct copy of the Stipulation of the Parties (April 26, 2022) entered into by Complaint Counsel and counsel for Amazon.

14. Attached to this Declaration as Exhibit L is a true and correct copy of four November 23, 2020, letters to Amazon relating to the Subject Product carbon monoxide detectors. CPSC_AM0009462-9466, CPSC_AM0009467-9471, CPSC_AM0009472-9476, CPSC_AM0009477-9481.

15. Attached to this Declaration as Exhibit M is a true and correct copy of sample procurement records for the purchase of samples of the Subject Product carbon monoxide detectors. CPSC_AM0000201-210, CPSC_AM0000211-19, CPSC_AM0000220, CPSC_AM0000221-230, CPSC_AM0000231-237, CPSC_AM0000238-244, CPSC_AM0000245, CPSC_AM0000246-257, CPSC_AM0000258, CPSC_AM0000259-266, CPSC_AM0000267-272, CPSC_AM0000273, CPSC_AM0000247-279, CPSC_AM0000280-281, CPSC_AM0000284-292, CPSC_AM0000293-297, CPSC_AM0000298-299, CPSC_AM0000300-301, CPSC_AM0000302-303, CPSC_AM0000304-305, CPSC_AM0000306-315, CPSC_AM0000316, CPSC_AM0000317-322, CPSC_AM0000323-324.

16. Attached to this Declaration as Exhibit N is a true and correct copy of the Underwriters Laboratories (“UL”) *Standard for Single and Multiple Station Alarms*, UL 2034 (4th edition). CPSC_AM0014333-14513.

17. Attached to this Declaration as Exhibit O is a true and correct copy of a March 2, 2021, Notice of Non-Compliance to Amazon relating to the Subject Product hair dryers. CPSC_AM00005051-5058.

18. Attached to this Declaration as Exhibit P is a true and correct copy of sample procurement records for the purchase of samples of the Subject Product hair dryers. CPSC_AM0001102-1107, CPSC_AM0001108, CPSC_AM0001150, CPSC_AM0001151-1152, CPSC_AM0001198-1199, CPSC_AM0001287-1288, CPSC_AM0001235-1236, CPSC_AM0001327-1328, CPSC_AM0001341-1342, CPSC_AM0001393-1394, CPSC_AM0001395-1396, CPSC_AM0001441-1442, CPSC_AM0001443-1468, CPSC_AM0001469-1478, CPSC_AM0001482-1487, CPSC_AM0001500, CPSC_AM0001502-1503, CPSC_AM0001527-1528, CPSC_AM0001543-1544, CPSC_AM0001573-1574, CPSC_AM0001600-1601, CPSC_AM0001606-1618, CPSC_AM0001619-1639, CPSC_AM0001640, CPSC_AM0001685-1686, CPSC_AM0001738, CPSC_AM0001771, CPSC_AM0001798.

19. Attached to this Declaration as Exhibit Q is a true and correct copy of portions of the transcript of the Rule 30(b)(6) Deposition of Amazon.com, Inc. (representative Sagi Goldberg) (Aug. 12, 2022), including Exhibits 3 ([REDACTED]), Amazon-CPSC-FBA-00002611) and 4 ([REDACTED]), Amazon-CPSC-FBA-00002387) thereto.

20. Attached to this Declaration as Exhibit R is a true and correct copy of Respondent's Supplemental Objections and Responses to Complaint Counsel's Interrogatory Nos. 16 and 17.

21. Attached to this Declaration as Exhibit S is a true and correct copy of the Product Safety Planning, Reporting, and Recall Handbook (September 2021). CPSC_AM0011464-11515.

22. Attached to this Declaration as Exhibit T is a true and correct copy of the Corrective Action Plan Template ("CAP Template") currently used by CPSC staff. CPSC_AM0012125-12133.

23. Attached to this Declaration as Exhibit U is a true and correct copy of portions of the transcript of the Rule 30(b)(6) Deposition of the Consumer Product Safety Commission (representative Blake Rose) (Aug. 26, 2022).

24. Attached to this Declaration as Exhibit V is a true and correct copy of Recall Alert Content Guidance used by the CPSC Office of Communications. CPSC_AM0011854-11856.

25. Attached to this Declaration as Exhibit W is a true and correct copy of Recall Release Content Guidance used by the CPSC Office of Communications. CPSC_AM0011857-11860.

26. Attached to this Declaration as Exhibit X is a true and correct copy of the Monthly Progress Report form currently used by CPSC staff. CPSC_AM0011544.

27. Attached to this Declaration as Exhibit Y is a true and correct copy of the press releases issued on CPSC's website for every recall of a hair dryer, carbon monoxide detector, or children's sleepwear garment conducted between 2015 and the present. CPSC_AM0015053-

15391, Linum Home Textiles Recalls Children's Robes Due to Violation of Federal Flammability Standards and Burn Hazard, CPSC (May 5, 2022)

<https://www.cpsc.gov/Recalls/2022/Linum-Home-Textiles-Recalls-Childrens-Robes-Due-to-Violation-of-Federal-Flammability-Standards-and-Burn-Hazard>.

28. Attached to this Declaration as Exhibit Z is a chart that accurately summarizes the corrective actions sought by the CPSC from companies for recalls of hair dryers, carbon monoxide detectors, and children's sleepwear garments conducted between 2015 and the present, based on the documents produced in discovery and attached as Exhibits Y and AA.

29. Attached to this Declaration as Exhibit AA are true and correct copies of the documents produced in discovery relating to the corrective actions sought by the CPSC from companies for recalls of hair dryers, carbon monoxide detectors, and children's sleepwear garments conducted between 2015 and the present. CPSC_AM0015414-17019.

30. Attached to this Declaration as Exhibit BB is a true and correct copy of a July 20, 2022, Notice of Violation directly to Amazon's Corporate Counsel, Genus Heidary, relating to the children's sleepwear listed by "[REDACTED]" on Amazon.com. CPSC_AM0014258-14262.

31. Attached to this Declaration as Exhibit CC is a true and correct copy of a July 20, 2022, Notice of Non-Compliance sent to Amazon's Corporate Counsel, Genus Heidary, relating to the carbon monoxide detector listed by "[REDACTED]" on Amazon.com. CPSC_AM0014281-14286.

32. Attached to this Declaration as Exhibit DD is a true and correct copy of a July 19, 2022, Notice of Non-Compliance sent to Amazon's Corporate Counsel, Genus Heidary,

relating to the two hair dryer brushes sold on Amazon.com by [REDACTED]

CPSC_AM0014274-14280.

33. Attached to this Declaration as Exhibit EE is a true and correct copy of the October 27, 1976, Decision and Order and accompanying Order, in the *In the Matter of Relco, Inc.* case. *In the Matter of Relco, Inc.*, CPSC Dkt. No. 74-4, Decision and Order and accompanying Order (Oct. 27, 1976).

I declare under penalty of perjury that the foregoing is true and correct.

9/23/2022

Date

John C. Eustice

John Eustice

CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2022, a copy of the foregoing was served upon all parties and participants of record in these proceedings as follows:

By email to the Secretary:

Alberta E. Mills
Secretary
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
Email: AMills@cpsc.gov

By email to the Presiding Officer:

Judge Carol Fox Foelak
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549
alj@sec.gov

By email to Counsel for Respondent:

Sarah L. Wilson
Stephen P. Anthony
Thomas R. Brugato
Nicholas Griepsma
Rukesh A. Korde
Covington & Burling LLP
One CityCenter
850 Tenth Street, N.W.
Washington, DC 20001-4956
swilson@cov.com
santhony@cov.com

John C. Eustice

Complaint Counsel for
U.S. Consumer Product Safety Commission

Exhibit A

(FILED UNDER SEAL)

Exhibit B

(FILED UNDER SEAL)

Exhibit C



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

NOTICE OF VIOLATION

November 3, 2020

Via Email to cpsc-inquiries@amazon.com (Delivery Receipt Requested)

Genus Heidary
Corporate Counsel
Global Product Safety & Compliance
Amazon
601 New Jersey Avenue, NW
Washington, DC 20001

RE: Failure to comply with mandatory safety requirements

Dear Genus Heidary:

The U.S. Consumer Product Safety Commission (CPSC) is the federal agency responsible for protecting consumers from substantial risks of injury or death associated with consumer products. We evaluated the product identified below and found the product to violate mandatory safety standards. These violations require your immediate attention and action because you are a distributor of the product.

VIOLATIONS AND REQUIRED ACTIONS

The product was sampled from your website at [Amazon.com](https://www.amazon.com). We evaluated and tested the sample to the applicable safety requirements.

The table below identifies the product, violations, and the minimum corrective actions needed to mitigate or remove the risk posed.

Sample No.	Product	Violations	Your Required Action(s)	Import Action (If Applicable)
20-800-1505 ASIN No. B01HGJY9FO	Children's Robe Advertised as: "Taiycyxgan Little Girl's Coral Fleece Bathrobe Unisex Kids Robe Pajamas Sleepwear"	Failed to meet the flammability requirements for children's sleepwear garments. See <u>16 CFR Part 1615</u> and <u>16 CFR Part 1616</u> .	Recall	N/A

SUMMARY OF PRIOR COMMUNICATIONS AND AGREEMENTS

We issued a Notice of Violation (NOV) concerning the identified product to Gan Jian DBA Taiycyxgan via email on January 24, 2020. After receiving a failed delivery attempt via email, we forwarded the NOV to Amazon, requesting they implement an immediate stop-sale of the identified product and to quarantine inventory. On January 29, 2020, Amazon's Product Safety Manager, Bradley Pfau, confirmed Amazon had executed a stop-sale of the product and requested to move forward with the destruction of the violative products in inventory. On February 5, 2020, we notified Amazon to move forward with destruction of all remaining units.

We have not received confirmation from Amazon that it has destroyed its inventory, despite numerous written attempts to do so. It has now been more than eight (8) months since destruction has been promised. Please supply evidence that the destruction has occurred.

REQUEST FOR ADDITIONAL INFORMATION

We ask that Amazon provide certificates of compliance for this product provided to you pursuant to 15 U.S.C. § 2063(g)(3), which requires, in part, that manufacturers (or private labelers) furnish to "each distributor or retailer of the product" a copy of any required certificates affirming a product's compliance to all applicable consumer product regulations. As a distributor of the products at issue here, Amazon is an entity to which such a certificate should have been supplied. *Id.* **Please provide copies of these certificates within five (5) business days of the date of this letter.**

We further request that you inform us if Amazon imported or retailed this product. Also, please identify any other importers, manufacturers, or distributors (other than Taiycyxgan) involved with the sale of this product on Amazon, with point of contact information including mailing address(es), e-mail address(es), and phone number(s), of this product. "This product" includes all products that share the same Amazon-assigned ASIN and any other products that Amazon on information and belief understands to be the same product whether or not the ASIN matches this product's ASIN.

Respond to this letter, including providing the requested information, via e-mail within five (5) business days of the date of this letter. For your convenience, we have included a Response Form (Attachment B) to indicate whether you will take the required action. You should complete the required actions as soon as practicable to mitigate risk to the public.

If you disagree with the assessment that a product(s) violates the requirements we identified, you must notify us in writing and provide the evidence and information demonstrating the product(s) complies with the applicable requirements. Submit this information via e-mail or other electronic transmission **within five (5) business days of the date of this letter.**

Failure to timely respond to this notice may be interpreted as a refusal to take corrective action, which could result in additional enforcement action, including assessment of civil penalties.

Should you have any questions or concerns, please contact Compliance Officer, Carolyn Carlin directly at ccarlin@cpsc.gov.

Sincerely,

Carolyn Carlin

Attachments:

Attachment A: Corrective Action Definitions

Attachment B: Response Form

Attachment A: Corrective Action Definitions

Correct Future Production/Correct Online Listing: You may proceed with importation, distribution and/or sale, including any existing inventory. However, you must correct all future production and shipments of this product. In the case of violations related to failure to display, or failure to display compliant, mandatory labeling or warnings, you must provide the corrected display upon request.

Conditional Release (Imports): You may remediate your product so that it does not violate applicable federal laws and regulations. You must communicate in writing your intention to remediate and perform the remediation before you apply to have the product released for import or export. You have 90 days from the time the products are released to your custody to perform any reconditioning. If you do not communicate your intention in writing or do not timely or satisfactorily perform the remediation, you risk seizure of the violative products. You also must comply with any requests to verify remediation, including requests to supply documentation of remediation and consenting to an inspection.

Stop Sale: You must immediately stop sale and distribution, and correct all future production of the product. You may NOT “sell through” your inventory or take actions, or allow inaction, the effect of which is to continue the distribution, or sale of the products.

You must inform the CPSC of how you intend to dispose of the product and comply with any requests to verify that disposition and its proper administration, up to and including our witnessing the correction or destruction of the product and collecting documentation.

You must notify your distribution and retail network that your product violates federal safety requirements and that continued distribution and sale of the product constitutes a violation of federal law. You should also provide specific instructions in your notification about how your distribution and retail network should handle any inventory (e.g., return, destroy, recondition, etc.) You should confirm the adequacy of these instructions with the CPSC prior to communicating to your distribution network to avoid having to re-issue instructions.

Recall: You must immediately Stop Sale and notify consumers of a no-cost recall remedy such as a refund or replacement. Notice must include direct notice in writing to all known purchasers. Among other things, the following actions are required to effectuate a recall:

1. Issuing a joint news release with CPSC notifying the public of the recall (unless you can contact nearly all consumers directly);
2. Establishing a toll-free telephone number to provide consumers with information about the recall;
3. Posting notification of the recall on your website and your social media accounts;

You should work closely with CPSC in effectuating the details of the recall.

Attachment B: Response Form

Review the information below and record either a “yes” or a “no” response under the “Agree to Required Action?” column and return this form to your assigned point of contact.

Sample No.	Product	Violations	Your Required Action(s)	Import Action (If Applicable)	Agree to Required Action? (Yes/No)
20-800-1505 ASIN No. B01HGJY9FO	Children’s Robe Advertised as: “Taiycyxgan Little Girl’s Coral Fleece Bathrobe Unisex Kids Robe Pajamas Sleepwear”	Failed to meet the flammability requirements for children’s sleepwear garments. See <u>16 CFR Part 1615</u> and <u>16 CFR Part 1616</u> .	Recall	N/A	

Exhibit D

(FILED UNDER SEAL)

Exhibit E



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

NOTICE OF VIOLATION

November 3, 2020

Via Email to [[HYPERLINK "mailto:cpSC-inquiries@amazon.com"](mailto:cpSC-inquiries@amazon.com)] (Delivery Receipt Requested)
Genus Heidary
Corporate Counsel
Global Product Safety & Compliance
Amazon
601 New Jersey Avenue, NW
Washington, DC 20001

RE: Failure to comply with mandatory safety requirements

Dear Genus Heidary:

The U.S. Consumer Product Safety Commission (CPSC) is the federal agency responsible for protecting consumers from substantial risks of injury or death associated with consumer products. We evaluated the product identified below and found the product to violate mandatory safety standards. These violations require your immediate attention and action because you are a distributor of the product.

VIOLATIONS AND REQUIRED ACTIONS

The product was sampled from your website at [[HYPERLINK "https://www.amazon.com/Homeswee-Collar-Printed-Bathrobe-Nightgown/dp/B0761X8FCK/ref=sr_1_29_sspa?ie=UTF8&qid=1535460388&sr=8-29-spons&keywords=kids%2Brobe&psc=1&th=1"](https://www.amazon.com/Homeswee-Collar-Printed-Bathrobe-Nightgown/dp/B0761X8FCK/ref=sr_1_29_sspa?ie=UTF8&qid=1535460388&sr=8-29-spons&keywords=kids%2Brobe&psc=1&th=1)]. We evaluated and tested the sample to the applicable safety requirements.

The table below identifies the product, violations, and the minimum corrective actions needed to mitigate or remove the risk posed.

Sample No.	Product	Violations	Your Required Action(s)	Import Action (If Applicable)
20-800-1726 ASIN No. B07S9B7QQ7 B07S66PR4G B07SCJNMFP B07S99Y5YP B07S99R16X B07SDLKLS4 B07SCJ2HK6 B07S87FF4G B07SCJ6FR6 B07S65KQX1	Children's Robe Advertised as: "IDGIRLS Kids Animal Hooded Soft Plush Flannel Bathrobes for Girls Boys Sleepwear"	Failed to meet the flammability requirements for children's sleepwear garments. See [HYPERLINK "https://www.ecfr.gov/cgi-bin/text-idx?SID=59ceb81a60d382bcc84bf00de2828ad9&node=16:2.0.1.4.94&rgn=div5"] and [HYPERLINK "https://www.ecfr.gov/cgi-bin/text-idx?SID=59ceb81a60d382bcc84bf00de2828ad9&node=16:2.0.1.4.95&rgn=div5"].	Recall	N/A

SUMMARY OF PRIOR COMMUNICATIONS AND AGREEMENTS

We issued a Notice of Violation (NOV) concerning the identified product to Wang Bo DBA IDGIRLS on February 21, 2020. Due to not receiving a response, we forwarded the NOV to Amazon on March 9, 2020, requesting they implement an immediate stop-sale of the identified product and to quarantine and destroy all remaining units in inventory. On May 5, 2020, we emailed Amazon again due to not receiving a response from Amazon's Product Safety Team. On May 12, 2020, Amazon's Product Safety Manager, Bradley Pfau confirmed Amazon had executed a stop-sale of the product on February 22, 2020, and all inventory within Amazon's facilities remained quarantined.

We have not received confirmation from Amazon that it has destroyed its inventory, despite numerous written attempts to do so. It has now been more than six (6) months since destruction has been promised. Please supply evidence that the destruction has occurred.

REQUEST FOR ADDITIONAL INFORMATION

We ask that Amazon provide certificates of compliance for this product provided to you pursuant to 15 U.S.C. § 2063(g)(3), which requires, in part, that manufacturers (or private labelers) furnish to "each distributor or retailer of the product" a copy of any required certificates affirming a product's compliance to all applicable consumer product regulations. As a distributor of the products at issue here, Amazon is an entity to which such a certificate should have been supplied. *Id.* **Please provide copies of these certificates within five (5) business days of the date of this letter.**

We further request that you inform us if Amazon imported or retailed this product. Also, please identify any other importers, manufacturers, or distributors (other than IDGIRL) involved with the sale of this product on Amazon, with point of contact information including mailing address(es), e-mail address(es), and phone number(s), of this product. "This product" includes all products that share the same Amazon-assigned ASIN and any other products that Amazon on information and belief understands to be the same product whether or not the ASIN matches this product's ASIN.

Respond to this letter, including providing the requested information, via e-mail within five (5) business days of the date of this letter. For your convenience, we have included a Response Form (Attachment B) to indicate whether you will take each required action. You should complete the required actions as soon as practicable to mitigate risk to the public.

If you disagree with the assessment that a product(s) violates the requirements we identified, you must notify us in writing and provide the evidence and information demonstrating the product(s) complies with the applicable requirements. Submit this information via e-mail or other electronic transmission **within five (5) business days of the date of this letter.**

Failure to timely respond to this notice may be interpreted as a refusal to take corrective action, which could result in additional enforcement action, including assessment of civil penalties.

Should you have any questions or concerns, please contact Compliance Officer, Carolyn Carlin directly at [[HYPERLINK "mailto:ccarlin@cpsc.gov"](mailto:ccarlin@cpsc.gov)].

Sincerely,

Carolyn Carlin

Attachments:

Attachment A: Corrective Action Definitions

Attachment B: Response Form

Attachment A: Corrective Action Definitions

Correct Future Production/Correct Online Listing: You may proceed with importation, distribution and/or sale, including any existing inventory. However, you must correct all future production and shipments of this product. In the case of violations related to failure to display, or failure to display compliant, mandatory labeling or warnings, you must provide the corrected display upon request.

Conditional Release (Imports): You may remediate your product so that it does not violate applicable federal laws and regulations. You must communicate in writing your intention to remediate and perform the remediation before you apply to have the product released for import or export. You have 90 days from the time the products are released to your custody to perform any reconditioning. If you do not communicate your intention in writing or do not timely or satisfactorily perform the remediation, you risk seizure of the violative products. You also must comply with any requests to verify remediation, including requests to supply documentation of remediation and consenting to an inspection.

Stop Sale: You must immediately stop sale and distribution, and correct all future production of the product. You may NOT “sell through” your inventory or take actions, or allow inaction, the effect of which is to continue the distribution, or sale of the products.

You must inform the CPSC of how you intend to dispose of the product and comply with any requests to verify that disposition and its proper administration, up to and including our witnessing the correction or destruction of the product and collecting documentation.

You must notify your distribution and retail network that your product violates federal safety requirements and that continued distribution and sale of the product constitutes a violation of federal law. You should also provide specific instructions in your notification about how your distribution and retail network should handle any inventory (e.g., return, destroy, recondition, etc.) You should confirm the adequacy of these instructions with the CPSC prior to communicating to your distribution network to avoid having to re-issue instructions.

Recall: You must immediately Stop Sale and notify consumers of a no-cost recall remedy such as a refund or replacement. Notice must include direct notice in writing to all known purchasers. Among other things, the following actions are required to effectuate a recall:

1. Issuing a joint news release with CPSC notifying the public of the recall (unless you can contact nearly all consumers directly);
2. Establishing a toll-free telephone number to provide consumers with information about the recall;
3. Posting notification of the recall on your website and your social media accounts;

You should work closely with CPSC in effectuating the details of the recall.

Attachment B: Response Form

Review the information below and record either a “yes” or a “no” response under the “Agree to Required Action?” column and return this form to your assigned point of contact.

Sample No.	Product	Violations	Your Required Action(s)	Import Action (If Applicable)	Agree to Required Action? (Yes/No)
20-800-1726 ASIN No. B07S9B7QQ7 B07S66PR4G B07SCJNMFP B07S99Y5YP B07S99R16X B07SDLKLS4 B07SCJ2HK6 B07S87FF4G B07SCJ6FR6 B07S65KQX1	Children’s Robe Advertised as: “IDGIRLS Kids Anima Hooded Soft Plush Flannel Bathrobes for Girls Boys Sleepwear”	Failed to meet the flammability requirements for children’s sleepwear garments. See [HYPERLINK "https://www.ecfr.gov/cgi-bin/text-idx?SID=59ceb81a60d382bcc84bf00de2828ad9&node=16:2.0.1.4.94&rgn=div5"] and [HYPERLINK "https://www.ecfr.gov/cgi-bin/text-idx?SID=59ceb81a60d382bcc84bf00de2828ad9&node=16:2.0.1.4.95&rgn=div5"].	Recall	N/A	

Exhibit F

(FILED UNDER SEAL)

Exhibit G



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

NOTICE OF VIOLATION

November 3, 2020

Via Email to cpsc-inquiries@amazon.com (Delivery Receipt Requested)

Genus Heidary
Corporate Counsel
Global Product Safety & Compliance
Amazon
601 New Jersey Avenue, NW
Washington, DC 20001

RE: Failure to comply with mandatory safety requirements

Dear Genus Heidary:

The U.S. Consumer Product Safety Commission (CPSC) is the federal agency responsible for protecting consumers from substantial risks of injury or death associated with consumer products. We evaluated the product identified below and found the product to violate mandatory safety standards. These violations require your immediate attention and action because you are a distributor of the product.

VIOLATIONS AND REQUIRED ACTIONS

The product was sampled from your website at [Amazon.com](https://www.amazon.com). We evaluated and tested the sample to the applicable safety requirements.

The table below identifies the product, violations, and the minimum corrective actions needed to mitigate or remove the risk posed.

Sample No.	Product	Violations	Your Required Action(s)	Import Action (If Applicable)
20-800-1727 ASIN No. B07QTGMWP K	Children’s Robe Advertised as: “Home Swee Boy’s Plush Fleece Robe Shawl Skull and Hooded Spacecraft Printed Soft Kids Bathrobe for Boy”	Failed to meet the flammability requirements for children’s sleepwear garments. See 16 CFR Part 1615 and 16 CFR Part 1616	Recall	N/A

SUMMARY OF PRIOR COMMUNICATIONS AND AGREEMENTS

We issued a Notice of Violation (NOV) concerning the identified product to Anhui Meiyang Fushi Co., LTD DBA DolceVida and Home Swee on March 17, 2020. Due to the lack of information provided from Home Swee, on March 31, 2020, we emailed Amazon’s Product Safety Team, requesting they implement an immediate stop-sale of the identified product and quarantine and destroy all remaining units in inventory. On April 1, 2020, Amazon’s Product Safety Manager, Bradley Pfau confirmed Amazon had executed a stop-sale and quarantine of the product and began working on the destruction of the inventory.

We have not received confirmation from Amazon that it has destroyed its inventory, despite numerous written attempts to do so. It has now been more than seven (7) months since destruction has been promised. Please supply evidence that the destruction has occurred.

REQUEST FOR ADDITIONAL INFORMATION

We ask that Amazon provide certificates of compliance for this product provided to you pursuant to 15 U.S.C. § 2063(g)(3), which requires, in part, that manufacturers (or private labelers) furnish to “each distributor or retailer of the product” a copy of any required certificates affirming a product’s compliance to all applicable consumer product regulations. As a distributor of the products at issue here, Amazon is an entity to which such a certificate should have been supplied. *Id.* **Please provide copies of these certificates within five (5) business days of the date of this letter.**

We further request that you inform us if Amazon imported or retailed this product. Also, please identify any other importers, manufacturers, or distributors (other than Home Swee) involved with the sale of this product on Amazon, with point of contact information including mailing address(es), e-mail address(es), and phone number(s), of this product. “This product”

includes all products that share the same Amazon-assigned ASIN and any other products that Amazon on information and belief understands to be the same product whether or not the ASIN matches this product's ASIN.

Respond to this letter, including providing the requested information, via e-mail within five (5) business days of the date of this letter. For your convenience, we have included a Response Form (Attachment B) to indicate whether you will take the required action. You should complete the required action as soon as practicable to mitigate risk to the public.

If you disagree with the assessment that a product(s) violates the requirements we identified, you must notify us in writing and provide the evidence and information demonstrating the product(s) complies with the applicable requirements. Submit this information via e-mail or other electronic transmission **within five (5) business days of the date of this letter.**

Failure to timely respond to this notice may be interpreted as a refusal to take corrective action, which could result in additional enforcement action, including assessment of civil penalties.

Should you have any questions or concerns, please contact Compliance Officer, Carolyn Carlin directly at ccarlin@cpsc.gov.

Sincerely,

Carolyn Carlin

Attachments:

Attachment A: Corrective Action Definitions

Attachment B: Response Form

Attachment A: Corrective Action Definitions

Correct Future Production/Correct Online Listing: You may proceed with importation, distribution and/or sale, including any existing inventory. However, you must correct all future production and shipments of this product. In the case of violations related to failure to display, or failure to display compliant, mandatory labeling or warnings, you must provide the corrected display upon request.

Conditional Release (Imports): You may remediate your product so that it does not violate applicable federal laws and regulations. You must communicate in writing your intention to remediate and perform the remediation before you apply to have the product released for import or export. You have 90 days from the time the products are released to your custody to perform any reconditioning. If you do not communicate your intention in writing or do not timely or satisfactorily perform the remediation, you risk seizure of the violative products. You also must comply with any requests to verify remediation, including requests to supply documentation of remediation and consenting to an inspection.

Stop Sale: You must immediately stop sale and distribution, and correct all future production of the product. You may NOT “sell through” your inventory or take actions, or allow inaction, the effect of which is to continue the distribution, or sale of the products.

You must inform the CPSC of how you intend to dispose of the product and comply with any requests to verify that disposition and its proper administration, up to and including our witnessing the correction or destruction of the product and collecting documentation.

You must notify your distribution and retail network that your product violates federal safety requirements and that continued distribution and sale of the product constitutes a violation of federal law. You should also provide specific instructions in your notification about how your distribution and retail network should handle any inventory (e.g., return, destroy, recondition, etc.) You should confirm the adequacy of these instructions with the CPSC prior to communicating to your distribution network to avoid having to re-issue instructions.

Recall: You must immediately Stop Sale and notify consumers of a no-cost recall remedy such as a refund or replacement. Notice must include direct notice in writing to all known purchasers. Among other things, the following actions are required to effectuate a recall:

1. Issuing a joint news release with CPSC notifying the public of the recall (unless you can contact nearly all consumers directly);
2. Establishing a toll-free telephone number to provide consumers with information about the recall;
3. Posting notification of the recall on your website and your social media accounts;

You should work closely with CPSC in effectuating the details of the recall.

Attachment B: Response Form

Review the information below and record either a “yes” or a “no” response under the “Agree to Required Action?” column and return this form to your assigned point of contact.

Sample No.	Product	Violations	Your Required Action(s)	Import Action (If Applicable)	Agree to Required Action? (Yes/No)
20-800-1727 ASIN No. B07QTGMWPK	Children’s Robe Advertised as: “Home Sweet Boy’s Plush Fleece Robe Shawl Skull and Hooded Spacecraft Printed Soft Kids Bathrobe for Boy”	Failed to meet the flammability requirements for children’s sleepwear garments. See 16 CFR Part 1615 and 16 CFR Part 1616	Recall	N/A	

Exhibit H

(FILED UNDER SEAL)

Exhibit I



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

NOTICE OF VIOLATION

November 3, 2020

Via Email to cpsc-inquiries@amazon.com (Delivery Receipt Requested)

Genus Heidary
Corporate Counsel
Global Product Safety & Compliance
Amazon
601 New Jersey Avenue, NW
Washington, DC 20001

RE: Failure to comply with mandatory safety requirements

Dear Genus Heidary:

The U.S. Consumer Product Safety Commission (CPSC) is the federal agency responsible for protecting consumers from substantial risks of injury or death associated with consumer products. We evaluated the product identified below and found the product to violate mandatory safety standards. These violations require your immediate attention and action because you are a distributor of the product.

VIOLATIONS AND REQUIRED ACTIONS

The product was sampled from your website at Amazon.com. We evaluated and tested the sample to the applicable safety requirements.

The table below identifies the product, violations, and the minimum corrective actions needed to mitigate or remove the risk posed.

Sample No.	Product	Violations	Your Required Action(s)	Import Action (If Applicable)
20-800-1345 ASIN No. B074V558SB	Children’s Nightgown Advertised as: “HOYMN Little Girl’s Lace Cotton Nightgowns, Kids Long- Sleeve Sleep Shirts Princess Sleepwear for Toddler 2-15 Years.”	Failed to meet the flammability requirements for children’s sleepwear garments. See 16 CFR Part 1615 and 16 CFR Part 1616.	Recall	N/A

SUMMARY OF PRIOR COMMUNICATIONS AND AGREEMENTS

We issued a Notice of Violation (NOV) concerning the identified product to Zaoxing Fan DBA HOYMN on March 17, 2020. After not receiving a response, we forwarded the NOV to Amazon on March 31, 2020, requesting it implement an immediate stop-sale of the identified product and quarantine and destroy all remaining units in inventory. On April 1, 2020, Amazon’s Product Safety Manager, Bradley Pfau confirmed Amazon had executed a stop-sale of the product and began working on the destruction of the inventory.

We have not received confirmation from Amazon that it has destroyed its inventory, despite numerous written inquiries. It has now been more than six (6) months since Amazon indicated it would destroy its inventory. Please supply evidence that the destruction occurred.

REQUEST FOR ADDITIONAL INFORMATION

We ask that Amazon provide certificates of compliance for this product provided to you pursuant to 15 U.S.C. § 2063(g)(3), which requires, in part, that manufacturers (or private labelers) furnish to “each distributor or retailer of the product” a copy of any required certificates affirming a product’s compliance to all applicable consumer product regulations. As a distributor of the products at issue here, Amazon is an entity to which such a certificate should have been supplied. ***Id.* Please provide copies of these certificates within five (5) business days of the date of this letter.**

We further request that you inform us if Amazon imported or retailed this product. Also, please identify any other importers, manufacturers, or distributors (other than HOYMN) involved with the sale of this product on Amazon, with point of contact information including mailing address(es), e-mail address(es), and phone number(s), of this product. “This product”

includes all products that share the same Amazon-assigned ASIN and any other products that Amazon on information and belief understands to be the same product whether or not the ASIN matches this product's ASIN.

Respond to this letter, including providing the requested information, via e-mail within five (5) business days of the date of this letter. For your convenience, we have included a Response Form (Attachment B) to indicate whether you will take the required action. You should complete the required actions as soon as practicable to mitigate risk to the public.

If you disagree with the assessment that the product violates the requirements we identified, you must notify us in writing and provide the evidence and information demonstrating that the product complies with the applicable requirements. Submit this information via e-mail or other electronic transmission **within five (5) business days of the date of this letter.**

Failure to timely respond to this notice may be interpreted as a refusal to take corrective action, which could result in additional enforcement action, including assessment of civil penalties.

Should you have any questions or concerns, please contact Compliance Officer, Carolyn Carlin directly at ccarlin@cpsc.gov.

Sincerely,

Carolyn Carlin

Attachments:

Attachment A: Corrective Action Definitions

Attachment B: Response Form

Attachment A: Corrective Action Definitions

Correct Future Production/Correct Online Listing: You may proceed with importation, distribution and/or sale, including any existing inventory. However, you must correct all future production and shipments of this product. In the case of violations related to failure to display, or failure to display compliant, mandatory labeling or warnings, you must provide the corrected display upon request.

Conditional Release (Imports): You may remediate your product so that it does not violate applicable federal laws and regulations. You must communicate in writing your intention to remediate and perform the remediation before you apply to have the product released for import or export. You have 90 days from the time the products are released to your custody to perform any reconditioning. If you do not communicate your intention in writing or do not timely or satisfactorily perform the remediation, you risk seizure of the violative products. You also must comply with any requests to verify remediation, including requests to supply documentation of remediation and consenting to an inspection.

Stop Sale: You must immediately stop sale and distribution, and correct all future production of the product. You may NOT “sell through” your inventory or take actions, or allow inaction, the effect of which is to continue the distribution, or sale of the products.

You must inform the CPSC of how you intend to dispose of the product and comply with any requests to verify that disposition and its proper administration, up to and including our witnessing the correction or destruction of the product and collecting documentation.

You must notify your distribution and retail network that your product violates federal safety requirements and that continued distribution and sale of the product constitutes a violation of federal law. You should also provide specific instructions in your notification about how your distribution and retail network should handle any inventory (e.g., return, destroy, recondition, etc.) You should confirm the adequacy of these instructions with the CPSC prior to communicating to your distribution network to avoid having to re-issue instructions.

Recall: You must immediately Stop Sale and notify consumers of a no-cost recall remedy such as a refund or replacement. Notice must include direct notice in writing to all known purchasers. Among other things, the following actions are required to effectuate a recall:

1. Issuing a joint news release with CPSC notifying the public of the recall (unless you can contact nearly all consumers directly);
2. Establishing a toll-free telephone number to provide consumers with information about the recall;
3. Posting notification of the recall on your website and your social media accounts;

You should work closely with CPSC in effectuating the details of the recall.

Attachment B: Response Form

Review the information below and record either a “yes” or a “no” response under the “Agree to Required Action?” column and return this form to your assigned point of contact.

Sample No.	Product	Violations	Your Required Action(s)	Import Action (If Applicable)	Agree to Required Action? (Yes/No)
20-800-1345 ASIN No. B074V558SB	Children’s Nightgown Advertised as: “HOYMN Little Girl’s Lace Cotton Nightgowns, Kids Long-Sleeve Sleep Shirts Princess Sleepwear for Toddler 2-15 Years.”	Failed to meet the flammability requirements for children’s sleepwear garments. See 16 CFR Part 1615 and 16 CFR Part 1616.	Recall	N/A	

Exhibit J

(FILED UNDER SEAL)

Exhibit K

**UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION**

In the Matter of Amazon.com, Inc.,

Respondent.

CPSC Docket No. 21-2

Hon. James E. Grimes
Presiding Officer

STIPULATION OF THE PARTIES

Respondent Amazon.com, Inc. and Complaint Counsel (together, the “Parties”) hereby jointly submit this Stipulation. The Parties enter into this Stipulation for purposes of this proceeding only. The Parties do not intend any preclusive effect or for collateral estoppel to apply to this Stipulation in any other proceeding. The Parties agree that the following issues will not be litigated in this proceeding and hereby stipulate to the following:

1. For purposes of this proceeding, Amazon does not contest that the Subject Product children’s sleepwear garments, sold by third-party sellers and identified by Amazon Standard Identification Number (“ASIN”) in paragraph 21 of the Complaint (“Garments”), were tested by the CPSC and did not meet the current flammability requirements for children’s sleepwear as required under the Flammable Fabrics Act, 15 U.S.C. §§ 1191–1204 and 16 C.F.R. Parts 1615–16 (2021), and therefore meet the requirements for a substantial product hazard under Section 15 (a)(1) of the CPSA (15 U.S.C. § 2064(a)(1)).

2. For purposes of this proceeding, Amazon does not contest that the Subject Product carbon monoxide (“CO”) detectors, sold by third-party sellers and identified by ASIN in paragraph 30 of the Complaint (“CO Detectors”), failed to alarm within 15 minutes when subjected to 400 ppm of CO according to testing conducted by the CPSC, and therefore did not meet the standards

set forth in the Underwriters Laboratories (“UL”) *Standard for Single and Multiple Station Alarms*, UL 2034 (4th edition), and thus meet the requirements for a substantial product hazard under Section 15(a)(2) of the CPSA (15 U.S.C. § 2064(a)(2)).

3. For purposes of this proceeding, Amazon does not contest that the Subject Product hair dryers, sold by third-party sellers and identified by ASIN in paragraph 39 of the Complaint (“Hair Dryers”), were evaluated by the CPSC pursuant to Section 5 of UL *Standard for Safety for Household Electric Personal Grooming Appliances*, UL 859 (10th edition) or Section 6 of UL *Standard for Safety for Commercial Electric Personal Grooming Appliances*, UL 1727 (4th edition), found not to contain an immersion protection device integral to the power cord, and therefore meet the requirements for a substantial product hazard under Sections 15(a)(2) and (j) of the CPSA (15 U.S.C. §§ 2064(a)(2) and (j)). *See* 16 C.F.R. § 1120.3.

4. Notwithstanding these stipulations, Amazon reserves the right to fully contest any and all remedial relief sought by Complaint Counsel in this action.

Dated: April 26, 2022

Respectfully submitted,



Sarah L. Wilson
Stephen P. Anthony
Thomas Brugato
Benjamin L. Cavataro
Diane Ramirez
COVINGTON & BURLING LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
202-662-5397
swilson@cov.com
santhony@cov.com
tbrugato@cov.com
bcavataro@cov.com
dramirez@cov.com

Counsel for Respondent



John C. Eustice
Liana G.T. Wolf
Serena Anand
Division of Enforcement and Litigation
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
Bethesda, MD 20814
(301) 504-7809

*Complaint Counsel for U.S. Consumer
Product Safety Commission*

Exhibit L



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

John C. Eustice
Senior Trial Counsel
Enforcement and Litigation Division
Office of Compliance and Field Operations

Email: JEustice@cpsc.gov

November 23, 2020

Via Email: cpsc-inquiries@amazon.com

Genus Heidary, Corporate Counsel
Amazon.com, Inc.
Global Product Safety & Compliance

Re: CPSC File No. PI210013
Amazon.com LLC
Carbon Monoxide Detector

Dear Ms. Heidary:

I am writing concerning the CD01 carbon monoxide detector(s) ("Subject Products") sold on Amazon.com ("Amazon") under ASIN B07HK8JHDV. We tested the Subject Products pursuant to UL 2034-4th edition, *Standard for Single and Multiple Station Carbon Monoxide Alarms*, Section 41: Sensitivity Test ("UL 2034"), to determine whether they alarmed in response to carbon monoxide, and they failed to meet the standard. Specifically, the Subject Products either alarmed prematurely or failed to alarm at all when exposed to certain levels of carbon monoxide.

Accordingly, we are seeking Amazon's agreement to a corrective action plan (CAP) as a distributor of the Subject Products. The CAP should include:

- Stop distribution and sale of the affected units;
- Issue public notice of the recall, including a joint press release with the CPSC, and direct notice to all identified consumers and purchasers; and
- A refund to all purchasers.

CPSC Hotline: 1-800-638-CPSC (2772) ★ [HYPERLINK "<http://www.cpsc.gov>"] ★ [HYPERLINK "<http://www.saferproducts.gov>"]

Fast Track Recall Program is an Innovations in American Government Award Winner

CPSC_AM0009462

Information Requested

In conjunction with Amazon's corrective action plan, please provide the following information:

- (1) The name, address, telephone number, and title of the person submitting the information to the Commission.
- (2) Information that will be given to purchasers, including consumers, about the defect, noncompliance, or risk with a description of how this information will be communicated. This shall include copies of drafts of any letters, press releases, warning labels, or other written information that has been or will be given to purchasers, including consumers.
- (3) The details of and schedule for the remedy, including plans for disposing of returned products.
- (4) The name and address of the manufacturer (or importer), including the email address.
- (5) An identification and description of the Subject Product(s). Give retail prices, brand name, series/model numbers, and date codes, along with all information necessary to decipher the date codes. Describe any identifying marks and their location on the product. Please also provide the inclusive dates of manufacture for each product series.
- (6) The total number of products and units involved.
- (7) The dates when products and units were imported, distributed, and sold at retail.
- (8) The number of products and units in each of the following: in the possession of the manufacturer or importer, in the possession of private labelers, in the possession of distributors, in the possession of retailers, and in the possession of consumers.
- (9) Provide all reports of incidents, property damage, and injuries related to the reported issue (failure to alarm in a timely manner).
- (10) Documentation on all deaths reported to Amazon involving the Subject Product, regardless of defect or hazard.
- (11) All UPC codes for all models involved.
- (12) Please indicate whether Amazon or the Firm tests the carbon monoxide detectors that it manufactures, imports, distributes or sells to UL 2034 or whether it requires

its suppliers to provide documentation to Amazon that such testing was completed. If Amazon is aware of other models of carbon monoxide detectors that it manufactures, imports, distributes or sells that do not conform to UL 2034, provide the make and model number of those products, along with the dates distributed and number distributed.

Due Date and Contact Information

We request that the Firm respond indicating whether it will agree to a CAP and providing all requested information **by COB Monday, November 30, 2020. Please send correspondence electronically to** [[HYPERLINK "mailto:JLaRubbio@cpsc.gov"](mailto:JLaRubbio@cpsc.gov)]. Please reference the file number stated above in your response.

Thank you for your cooperation in this matter.

Sincerely,

A rectangular box containing a handwritten signature in cursive script, which appears to read "John Eustice".

John C. Eustice
Senior Trial Counsel
Enforcement and Litigation Division

Enclosure

Additional Information

This following additional information is provided to help you understand your rights and responsibilities under the laws administered by the CPSC. Please contact me at JEustice@cpsc.gov with any questions.

Compliance with Reporting Obligations

We will investigate and assess whether we believe the Firm has complied with the reporting requirements of section 15(b) of the CPSA, 15 U.S.C. § 2064(b). Section 15(b) requires every manufacturer, importer, distributor, and retailer of a consumer product, or of any other product or substance over which the CPSC has jurisdiction under any other statute enforced by the CPSC, who obtains information which reasonably supports the conclusion that the product (1) contains a defect which could create a substantial product hazard, (2) creates an unreasonable risk of serious injury or death, (3) fails to comply with an applicable consumer product safety rule or with a voluntary consumer product safety standard upon which the CPSC has relied under section 9 of the CPSA, 15 U.S.C. § 2058, or (4) fails to comply with any other rule, regulation, standard, or ban under the CPSA or any other statute enforced by the CPSC, to immediately inform the CPSC of the defect, risk, or failure to comply, unless the firm has actual knowledge that the CPSC has been adequately informed of the defect, risk, or failure to comply. *See* 16 C.F.R. part 1115.

Failure to comply with the CPSC's reporting requirements is a prohibited act under sections 19(a)(3) and (4) of the CPSA, 15 U.S.C. §§ 2068(a)(3) and (4). Pursuant to section 20 of the CPSA, 15 U.S.C. § 2069, such violations could subject you and the Firm to civil penalties of up to \$110,000 per violation up to a maximum of \$16.025 million for any related series of violations. In addition, pursuant to section 21 of the CPSA, 15 U.S.C. § 2070, such violations could subject you and the Firm to criminal penalties including a fine, imprisonment for not more than five (5) years and forfeiture of assets associated with the violation(s).

Continuing Obligations and Duty to Preserve

The Firm has a continuing obligation to supplement or correct its "Full Report" and any other information it provides, including the information submitted in response to the above requests. If, for example, after submitting its report and information to the CPSC, the Firm receives or learns of information concerning complaints, claims, incidents, or injuries that the Firm did not report, or other information that affects the scope, prevalence, or seriousness of the reported problem, issue, or potential defect or hazard, the Firm must immediately report that information to the Office of Compliance and Field Operations.

In addition, until this matter and any related matters are resolved, there will remain the possibility of further enforcement action, including reasonably anticipated litigation. Therefore, the Firm must abide by the continuing legal obligation to preserve all information, documents, electronically-stored data, and samples, now in existence or created hereafter, related to the Subject Products.

Information Disclosure

Section 6(b)(5) of the CPSA, 15 U.S.C. § 2055(b)(5), prohibits the CPSC from releasing information submitted under section 15(b) of the CPSA unless a remedial action plan has been accepted in writing, a complaint has been issued, the submitting person consents to such release, or the CPSC publishes a finding that the public health and safety require such release.

If the Firm submits any information that it considers to be a trade secret, or confidential commercial or financial information, it must mark it “confidential” in accordance with section 6(a)(3) of the CPSA, 15 U.S.C. § 2055(a)(3). The CPSC may not disclose to the public trade secret information or proprietary commercial or financial data. If the Firm does not request confidential treatment at the time of its submission, or within ten days thereafter, the staff will assume that it does not consider information in the submission to be a trade secret or otherwise exempt from disclosure under section 6(a) of the CPSA and under the Freedom of Information Act, 5 U.S.C. § 552(b)(4).

Additional Materials

Information about the CPSA and the CPSC regulation titled “Substantial Product Hazard Reports” (16 C.F.R. Part 1115) can be accessed online using the links below.

- Consumer Product Safety Act – [HYPERLINK "https://www.cpsc.gov/s3fs-public/pdfs/blk_media_cpsa.pdf"]
- Federal Hazardous Substances Act – [HYPERLINK "https://www.cpsc.gov/s3fs-public/pdfs/blk_pdf_fhsa.pdf"]
- 16 C.F.R. Part 1101, Information Disclosure – [HYPERLINK "<http://www.cpsc.gov/en/Newsroom/FOIA/Guide-to-Public-Information>"]
- Substantial Product Hazard Reports – [HYPERLINK "<https://www.gpo.gov/fdsys/pkg/FR-2006-07-25/pdf/E6-11758.pdf>"]
- CPSA Section 6(b) Fact Sheet – [HYPERLINK "https://www.cpsc.gov/s3fs-public/pdfs/blk_pdf_CPSA6bFactSheet.pdf"]
- Section 37 Information Reporting – [HYPERLINK "https://www.cpsc.gov/s3fs-public/pdfs/blk_media_cpsa37.pdf"]
- Recall Guidance – [HYPERLINK "<https://www.cpsc.gov/recallguidance>"]
- Recall Handbook – [HYPERLINK "<https://www.cpsc.gov/s3fs-public/8002.pdf>"]
- Recall Checklist – [HYPERLINK "<https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance/Recall-Checklist>"]



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

John C. Eustice
Senior Trial Counsel
Enforcement and Litigation Division
Office of Compliance and Field Operations

Email: JEustice@cpsc.gov

November 23, 2020

Via Email: cpsc-inquiries@amazon.com

Genus Heidary, Corporate Counsel
Amazon.com, Inc.
Global Product Safety & Compliance

Re: CPSC File No. PI210014
Amazon.com LLC
Carbon Monoxide Detector

Dear Ms. Heidary:

I am writing concerning the ME2-CO carbon monoxide detector(s) ("Subject Products") sold on Amazon.com ("Amazon") under ASIN B07GNKD44L. We tested the Subject Products pursuant to UL 2034-4th edition, *Standard for Single and Multiple Station Carbon Monoxide Alarms*, Section 41: Sensitivity Test ("UL 2034"), to determine whether they alarmed in response to carbon monoxide, and they failed to meet the standard. Specifically, the Subject Products either alarmed prematurely or failed to alarm at all when exposed to certain levels of carbon monoxide.

Accordingly, we are seeking Amazon's agreement to a corrective action plan (CAP) as a distributor of the Subject Products. The CAP should include:

- Stop distribution and sale of the affected units;
- Issue public notice of the recall, including a joint press release with the CPSC, and direct notice to all identified consumers and purchasers; and
- A refund to all purchasers.

CPSC Hotline: 1-800-638-CPSC (2772) ★ [HYPERLINK "<http://www.cpsc.gov>"] ★ [HYPERLINK "<http://www.saferproducts.gov>"]

Fast Track Recall Program is an Innovations in American Government Award Winner

CPSC_AM0009467

Information Requested

In conjunction with Amazon's corrective action plan, please provide the following information:

- (1) The name, address, telephone number, and title of the person submitting the information to the Commission.
- (2) Information that will be given to purchasers, including consumers, about the defect, noncompliance, or risk with a description of how this information will be communicated. This shall include copies of drafts of any letters, press releases, warning labels, or other written information that has been or will be given to purchasers, including consumers.
- (3) The details of and schedule for the remedy, including plans for disposing of returned products.
- (4) The name and address of the manufacturer (or importer), including the email address.
- (5) An identification and description of the Subject Product(s). Give retail prices, brand name, series/model numbers, and date codes, along with all information necessary to decipher the date codes. Describe any identifying marks and their location on the product. Please also provide the inclusive dates of manufacture for each product series.
- (6) The total number of products and units involved.
- (7) The dates when products and units were imported, distributed, and sold at retail.
- (8) The number of products and units in each of the following: in the possession of the manufacturer or importer, in the possession of private labelers, in the possession of distributors, in the possession of retailers, and in the possession of consumers.
- (9) Provide all reports of incidents, property damage, and injuries related to the reported issue (failure to alarm in a timely manner).
- (10) Documentation on all deaths reported to Amazon involving the Subject Product, regardless of defect or hazard.
- (11) All UPC codes for all models involved.
- (12) Please indicate whether Amazon or the Firm tests the carbon monoxide detectors that it manufactures, imports, distributes or sells to UL 2034 or whether it requires

its suppliers to provide documentation to Amazon that such testing was completed. If Amazon is aware of other models of carbon monoxide detectors that it manufactures, imports, distributes or sells that do not conform to UL 2034, provide the make and model number of those products, along with the dates distributed and number distributed.

Due Date and Contact Information

We request that the Firm respond indicating whether it will agree to a CAP and providing all requested information **by COB Monday, November 30, 2020. Please send correspondence electronically to** [[HYPERLINK "mailto:JLaRubbio@cpsc.gov"](mailto:JLaRubbio@cpsc.gov)]. Please reference the file number stated above in your response.

Thank you for your cooperation in this matter.

Sincerely,

A rectangular box containing a handwritten signature in cursive script, which appears to read "John Eustice".

John C. Eustice
Senior Trial Counsel
Enforcement and Litigation Division

Enclosure

Additional Information

This following additional information is provided to help you understand your rights and responsibilities under the laws administered by the CPSC. Please contact me at JEustice@cpsc.gov with any questions.

Compliance with Reporting Obligations

We will investigate and assess whether we believe the Firm has complied with the reporting requirements of section 15(b) of the CPSA, 15 U.S.C. § 2064(b). Section 15(b) requires every manufacturer, importer, distributor, and retailer of a consumer product, or of any other product or substance over which the CPSC has jurisdiction under any other statute enforced by the CPSC, who obtains information which reasonably supports the conclusion that the product (1) contains a defect which could create a substantial product hazard, (2) creates an unreasonable risk of serious injury or death, (3) fails to comply with an applicable consumer product safety rule or with a voluntary consumer product safety standard upon which the CPSC has relied under section 9 of the CPSA, 15 U.S.C. § 2058, or (4) fails to comply with any other rule, regulation, standard, or ban under the CPSA or any other statute enforced by the CPSC, to immediately inform the CPSC of the defect, risk, or failure to comply, unless the firm has actual knowledge that the CPSC has been adequately informed of the defect, risk, or failure to comply. *See* 16 C.F.R. part 1115.

Failure to comply with the CPSC's reporting requirements is a prohibited act under sections 19(a)(3) and (4) of the CPSA, 15 U.S.C. §§ 2068(a)(3) and (4). Pursuant to section 20 of the CPSA, 15 U.S.C. § 2069, such violations could subject you and the Firm to civil penalties of up to \$110,000 per violation up to a maximum of \$16.025 million for any related series of violations. In addition, pursuant to section 21 of the CPSA, 15 U.S.C. § 2070, such violations could subject you and the Firm to criminal penalties including a fine, imprisonment for not more than five (5) years and forfeiture of assets associated with the violation(s).

Continuing Obligations and Duty to Preserve

The Firm has a continuing obligation to supplement or correct its "Full Report" and any other information it provides, including the information submitted in response to the above requests. If, for example, after submitting its report and information to the CPSC, the Firm receives or learns of information concerning complaints, claims, incidents, or injuries that the Firm did not report, or other information that affects the scope, prevalence, or seriousness of the reported problem, issue, or potential defect or hazard, the Firm must immediately report that information to the Office of Compliance and Field Operations.

In addition, until this matter and any related matters are resolved, there will remain the possibility of further enforcement action, including reasonably anticipated litigation. Therefore, the Firm must abide by the continuing legal obligation to preserve all information, documents, electronically-stored data, and samples, now in existence or created hereafter, related to the Subject Products.

Information Disclosure

Section 6(b)(5) of the CPSA, 15 U.S.C. § 2055(b)(5), prohibits the CPSC from releasing information submitted under section 15(b) of the CPSA unless a remedial action plan has been accepted in writing, a complaint has been issued, the submitting person consents to such release, or the CPSC publishes a finding that the public health and safety require such release.

If the Firm submits any information that it considers to be a trade secret, or confidential commercial or financial information, it must mark it “confidential” in accordance with section 6(a)(3) of the CPSA, 15 U.S.C. § 2055(a)(3). The CPSC may not disclose to the public trade secret information or proprietary commercial or financial data. If the Firm does not request confidential treatment at the time of its submission, or within ten days thereafter, the staff will assume that it does not consider information in the submission to be a trade secret or otherwise exempt from disclosure under section 6(a) of the CPSA and under the Freedom of Information Act, 5 U.S.C. § 552(b)(4).

Additional Materials

Information about the CPSA and the CPSC regulation titled “Substantial Product Hazard Reports” (16 C.F.R. Part 1115) can be accessed online using the links below.

- Consumer Product Safety Act – [HYPERLINK "https://www.cpsc.gov/s3fs-public/pdfs/blk_media_cpsa.pdf"]
- Federal Hazardous Substances Act – [HYPERLINK "https://www.cpsc.gov/s3fs-public/pdfs/blk_pdf_fhsa.pdf"]
- 16 C.F.R. Part 1101, Information Disclosure – [HYPERLINK "<http://www.cpsc.gov/en/Newsroom/FOIA/Guide-to-Public-Information>"]
- Substantial Product Hazard Reports – [HYPERLINK "<https://www.gpo.gov/fdsys/pkg/FR-2006-07-25/pdf/E6-11758.pdf>"]
- CPSA Section 6(b) Fact Sheet – [HYPERLINK "https://www.cpsc.gov/s3fs-public/pdfs/blk_pdf_CPSA6bFactSheet.pdf"]
- Section 37 Information Reporting – [HYPERLINK "https://www.cpsc.gov/s3fs-public/pdfs/blk_media_cpsa37.pdf"]
- Recall Guidance – [HYPERLINK "<https://www.cpsc.gov/recallguidance>"]
- Recall Handbook – [HYPERLINK "<https://www.cpsc.gov/s3fs-public/8002.pdf>"]
- Recall Checklist – [HYPERLINK "<https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance/Recall-Checklist>"]



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

John C. Eustice
Senior Trial Counsel
Enforcement and Litigation Division
Office of Compliance and Field Operations

Email: JEustice@cpsc.gov

November 23, 2020

Via Email: cpsc-inquiries@amazon.com

Genus Heidary, Corporate Counsel
Amazon.com, Inc.
Global Product Safety & Compliance

Re: CPSC File No. PI210016
Amazon.com LLC
Carbon Monoxide Detector

Dear Ms. Heidary:

I am writing concerning the ME2-CO and ss4 carbon monoxide detector(s) ("Subject Products") sold on Amazon.com ("Amazon") under ASINs B07C2KM8RB and B07BDJTX8W. We tested the Subject Products pursuant to UL 2034-4th edition, *Standard for Single and Multiple Station Carbon Monoxide Alarms*, Section 41: Sensitivity Test ("UL 2034"), to determine whether they alarmed in response to carbon monoxide, and they failed to meet the standard. Specifically, the Subject Products either alarmed prematurely or failed to alarm at all when exposed to certain levels of carbon monoxide.

Accordingly, we are seeking Amazon's agreement to a corrective action plan (CAP) as a distributor of the Subject Products. The CAP should include:

- Stop distribution and sale of the affected units;
- Issue public notice of the recall, including a joint press release with the CPSC, and direct notice to all identified consumers and purchasers; and
- A refund to all purchasers.

CPSC Hotline: 1-800-638-CPSC (2772) ★ [HYPERLINK "<http://www.cpsc.gov>"] ★ [HYPERLINK "<http://www.saferproducts.gov>"]

Fast Track Recall Program is an Innovations in American Government Award Winner

CPSC_AM0009472

Information Requested

In conjunction with Amazon's corrective action plan, please provide the following information:

- (1) The name, address, telephone number, and title of the person submitting the information to the Commission.
- (2) Information that will be given to purchasers, including consumers, about the defect, noncompliance, or risk with a description of how this information will be communicated. This shall include copies of drafts of any letters, press releases, warning labels, or other written information that has been or will be given to purchasers, including consumers.
- (3) The details of and schedule for the remedy, including plans for disposing of returned products.
- (4) The name and address of the manufacturer (or importer), including the email address.
- (5) An identification and description of the Subject Product(s). Give retail prices, brand name, series/model numbers, and date codes, along with all information necessary to decipher the date codes. Describe any identifying marks and their location on the product. Please also provide the inclusive dates of manufacture for each product series.
- (6) The total number of products and units involved.
- (7) The dates when products and units were imported, distributed, and sold at retail.
- (8) The number of products and units in each of the following: in the possession of the manufacturer or importer, in the possession of private labelers, in the possession of distributors, in the possession of retailers, and in the possession of consumers.
- (9) Provide all reports of incidents, property damage, and injuries related to the reported issue (failure to alarm in a timely manner).
- (10) Documentation on all deaths reported to Amazon involving the Subject Product, regardless of defect or hazard.
- (11) All UPC codes for all models involved.
- (12) Please indicate whether Amazon or the Firm tests the carbon monoxide detectors that it manufactures, imports, distributes or sells to UL 2034 or whether it requires

its suppliers to provide documentation to Amazon that such testing was completed. If Amazon is aware of other models of carbon monoxide detectors that it manufactures, imports, distributes or sells that do not conform to UL 2034, provide the make and model number of those products, along with the dates distributed and number distributed.

Due Date and Contact Information

We request that the Firm respond indicating whether it will agree to a CAP and providing all requested information **by COB Monday, November 30, 2020. Please send correspondence electronically to** [[HYPERLINK "mailto:JLaRubbio@cpsc.gov"](mailto:JLaRubbio@cpsc.gov)]. Please reference the file number stated above in your response.

Thank you for your cooperation in this matter.

Sincerely,

A rectangular box containing a handwritten signature in cursive script, which appears to read "John Eustice".

John C. Eustice
Senior Trial Counsel
Enforcement and Litigation Division

Enclosure

Additional Information

This following additional information is provided to help you understand your rights and responsibilities under the laws administered by the CPSC. Please contact me at JEustice@cpsc.gov with any questions.

Compliance with Reporting Obligations

We will investigate and assess whether we believe the Firm has complied with the reporting requirements of section 15(b) of the CPSA, 15 U.S.C. § 2064(b). Section 15(b) requires every manufacturer, importer, distributor, and retailer of a consumer product, or of any other product or substance over which the CPSC has jurisdiction under any other statute enforced by the CPSC, who obtains information which reasonably supports the conclusion that the product (1) contains a defect which could create a substantial product hazard, (2) creates an unreasonable risk of serious injury or death, (3) fails to comply with an applicable consumer product safety rule or with a voluntary consumer product safety standard upon which the CPSC has relied under section 9 of the CPSA, 15 U.S.C. § 2058, or (4) fails to comply with any other rule, regulation, standard, or ban under the CPSA or any other statute enforced by the CPSC, to immediately inform the CPSC of the defect, risk, or failure to comply, unless the firm has actual knowledge that the CPSC has been adequately informed of the defect, risk, or failure to comply. *See* 16 C.F.R. part 1115.

Failure to comply with the CPSC's reporting requirements is a prohibited act under sections 19(a)(3) and (4) of the CPSA, 15 U.S.C. §§ 2068(a)(3) and (4). Pursuant to section 20 of the CPSA, 15 U.S.C. § 2069, such violations could subject you and the Firm to civil penalties of up to \$110,000 per violation up to a maximum of \$16.025 million for any related series of violations. In addition, pursuant to section 21 of the CPSA, 15 U.S.C. § 2070, such violations could subject you and the Firm to criminal penalties including a fine, imprisonment for not more than five (5) years and forfeiture of assets associated with the violation(s).

Continuing Obligations and Duty to Preserve

The Firm has a continuing obligation to supplement or correct its "Full Report" and any other information it provides, including the information submitted in response to the above requests. If, for example, after submitting its report and information to the CPSC, the Firm receives or learns of information concerning complaints, claims, incidents, or injuries that the Firm did not report, or other information that affects the scope, prevalence, or seriousness of the reported problem, issue, or potential defect or hazard, the Firm must immediately report that information to the Office of Compliance and Field Operations.

In addition, until this matter and any related matters are resolved, there will remain the possibility of further enforcement action, including reasonably anticipated litigation. Therefore, the Firm must abide by the continuing legal obligation to preserve all information, documents, electronically-stored data, and samples, now in existence or created hereafter, related to the Subject Products.

Information Disclosure

Section 6(b)(5) of the CPSA, 15 U.S.C. § 2055(b)(5), prohibits the CPSC from releasing information submitted under section 15(b) of the CPSA unless a remedial action plan has been accepted in writing, a complaint has been issued, the submitting person consents to such release, or the CPSC publishes a finding that the public health and safety require such release.

If the Firm submits any information that it considers to be a trade secret, or confidential commercial or financial information, it must mark it “confidential” in accordance with section 6(a)(3) of the CPSA, 15 U.S.C. § 2055(a)(3). The CPSC may not disclose to the public trade secret information or proprietary commercial or financial data. If the Firm does not request confidential treatment at the time of its submission, or within ten days thereafter, the staff will assume that it does not consider information in the submission to be a trade secret or otherwise exempt from disclosure under section 6(a) of the CPSA and under the Freedom of Information Act, 5 U.S.C. § 552(b)(4).

Additional Materials

Information about the CPSA and the CPSC regulation titled “Substantial Product Hazard Reports” (16 C.F.R. Part 1115) can be accessed online using the links below.

- Consumer Product Safety Act – [HYPERLINK "https://www.cpsc.gov/s3fs-public/pdfs/blk_media_cpsa.pdf"]
- Federal Hazardous Substances Act – [HYPERLINK "https://www.cpsc.gov/s3fs-public/pdfs/blk_pdf_fhsa.pdf"]
- 16 C.F.R. Part 1101, Information Disclosure – [HYPERLINK "<http://www.cpsc.gov/en/Newsroom/FOIA/Guide-to-Public-Information>"]
- Substantial Product Hazard Reports – [HYPERLINK "<https://www.gpo.gov/fdsys/pkg/FR-2006-07-25/pdf/E6-11758.pdf>"]
- CPSA Section 6(b) Fact Sheet – [HYPERLINK "https://www.cpsc.gov/s3fs-public/pdfs/blk_pdf_CPSA6bFactSheet.pdf"]
- Section 37 Information Reporting – [HYPERLINK "https://www.cpsc.gov/s3fs-public/pdfs/blk_media_cpsa37.pdf"]
- Recall Guidance – [HYPERLINK "<https://www.cpsc.gov/recallguidance>"]
- Recall Handbook – [HYPERLINK "<https://www.cpsc.gov/s3fs-public/8002.pdf>"]
- Recall Checklist – [HYPERLINK "<https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance/Recall-Checklist>"]



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

John C. Eustice
Senior Trial Counsel
Enforcement and Litigation Division
Office of Compliance and Field Operations

Email: JEustice@cpsc.gov

November 23, 2020

Via Email: cpsc-inquiries@amazon.com

Genus Heidary, Corporate Counsel
Amazon.com, Inc.
Global Product Safety & Compliance

Re: CPSC File No. PI210022
Amazon.com LLC
Carbon Monoxide Detector

Dear Ms. Heidary:

I am writing concerning the carbon monoxide detector(s) ("Subject Products") sold on Amazon.com ("Amazon") under ASIN B07MPP42GT. We tested the Subject Products pursuant to UL 2034-4th edition, *Standard for Single and Multiple Station Carbon Monoxide Alarms*, Section 41: Sensitivity Test ("UL 2034"), to determine whether they alarmed in response to carbon monoxide, and they failed to meet the standard. Specifically, the Subject Products either alarmed prematurely or failed to alarm at all when exposed to certain levels of carbon monoxide.

Accordingly, we are seeking Amazon's agreement to a corrective action plan (CAP) as a distributor of the Subject Products. The CAP should include:

- Stop distribution and sale of the affected units;
- Issue public notice of the recall, including a joint press release with the CPSC, and direct notice to all identified consumers and purchasers; and
- A refund to all purchasers.

Information Requested

In conjunction with Amazon's corrective action plan, please provide the following information:

CPSC Hotline: 1-800-638-CPSC (2772) ★ [HYPERLINK "<http://www.cpsc.gov>"] ★ [HYPERLINK "<http://www.saferproducts.gov>"]

Fast Track Recall Program is an Innovations in American Government Award Winner

CPSC_AM0009477

- (1) The name, address, telephone number, and title of the person submitting the information to the Commission.
- (2) Information that will be given to purchasers, including consumers, about the defect, noncompliance, or risk with a description of how this information will be communicated. This shall include copies of drafts of any letters, press releases, warning labels, or other written information that has been or will be given to purchasers, including consumers.
- (3) The details of and schedule for the remedy, including plans for disposing of returned products.
- (4) The name and address of the manufacturer (or importer), including the email address.
- (5) An identification and description of the Subject Product(s). Give retail prices, brand name, series/model numbers, and date codes, along with all information necessary to decipher the date codes. Describe any identifying marks and their location on the product. Please also provide the inclusive dates of manufacture for each product series.
- (6) The total number of products and units involved.
- (7) The dates when products and units were imported, distributed, and sold at retail.
- (8) The number of products and units in each of the following: in the possession of the manufacturer or importer, in the possession of private labelers, in the possession of distributors, in the possession of retailers, and in the possession of consumers.
- (9) Provide all reports of incidents, property damage, and injuries related to the reported issue (failure to alarm in a timely manner).
- (10) Documentation on all deaths reported to Amazon involving the Subject Product, regardless of defect or hazard.
- (11) All UPC codes for all models involved.
- (12) Please indicate whether Amazon or the Firm tests the carbon monoxide detectors that it manufactures, imports, distributes or sells to UL 2034 or whether it requires its suppliers to provide documentation to Amazon that such testing was completed. If Amazon is aware of other models of carbon monoxide detectors that it manufactures, imports, distributes or sells that do not conform to UL 2034, provide


the make and model number of those products, along with the dates distributed and number distributed.

Due Date and Contact Information

We request that the Firm respond indicating whether it will agree to a CAP and providing all requested information **by COB Monday, November 30, 2020. Please send correspondence electronically to** [[HYPERLINK "mailto:JLaRubbio@cpsc.gov"](mailto:JLaRubbio@cpsc.gov)]. Please reference the file number stated above in your response.

Thank you for your cooperation in this matter.

Sincerely,

A rectangular area containing a handwritten signature in cursive script, which appears to read "John Eustice".

John C. Eustice
Senior Trial Counsel
Enforcement and Litigation Division

Enclosure

Additional Information

This following additional information is provided to help you understand your rights and responsibilities under the laws administered by the CPSC. Please contact me at JEustice@cpsc.gov with any questions.

Compliance with Reporting Obligations

We will investigate and assess whether we believe the Firm has complied with the reporting requirements of section 15(b) of the CPSA, 15 U.S.C. § 2064(b). Section 15(b) requires every manufacturer, importer, distributor, and retailer of a consumer product, or of any other product or substance over which the CPSC has jurisdiction under any other statute enforced by the CPSC, who obtains information which reasonably supports the conclusion that the product (1) contains a defect which could create a substantial product hazard, (2) creates an unreasonable risk of serious injury or death, (3) fails to comply with an applicable consumer product safety rule or with a voluntary consumer product safety standard upon which the CPSC has relied under section 9 of the CPSA, 15 U.S.C. § 2058, or (4) fails to comply with any other rule, regulation, standard, or ban under the CPSA or any other statute enforced by the CPSC, to immediately inform the CPSC of the defect, risk, or failure to comply, unless the firm has actual knowledge that the CPSC has been adequately informed of the defect, risk, or failure to comply. *See* 16 C.F.R. part 1115.

Failure to comply with the CPSC's reporting requirements is a prohibited act under sections 19(a)(3) and (4) of the CPSA, 15 U.S.C. §§ 2068(a)(3) and (4). Pursuant to section 20 of the CPSA, 15 U.S.C. § 2069, such violations could subject you and the Firm to civil penalties of up to \$110,000 per violation up to a maximum of \$16.025 million for any related series of violations. In addition, pursuant to section 21 of the CPSA, 15 U.S.C. § 2070, such violations could subject you and the Firm to criminal penalties including a fine, imprisonment for not more than five (5) years and forfeiture of assets associated with the violation(s).

Continuing Obligations and Duty to Preserve

The Firm has a continuing obligation to supplement or correct its "Full Report" and any other information it provides, including the information submitted in response to the above requests. If, for example, after submitting its report and information to the CPSC, the Firm receives or learns of information concerning complaints, claims, incidents, or injuries that the Firm did not report, or other information that affects the scope, prevalence, or seriousness of the reported problem, issue, or potential defect or hazard, the Firm must immediately report that information to the Office of Compliance and Field Operations.

In addition, until this matter and any related matters are resolved, there will remain the possibility of further enforcement action, including reasonably anticipated litigation. Therefore, the Firm must abide by the continuing legal obligation to preserve all information, documents, electronically-stored data, and samples, now in existence or created hereafter, related to the Subject Products.

Information Disclosure

Section 6(b)(5) of the CPSA, 15 U.S.C. § 2055(b)(5), prohibits the CPSC from releasing information submitted under section 15(b) of the CPSA unless a remedial action plan has been accepted in writing, a complaint has been issued, the submitting person consents to such release, or the CPSC publishes a finding that the public health and safety require such release.

If the Firm submits any information that it considers to be a trade secret, or confidential commercial or financial information, it must mark it “confidential” in accordance with section 6(a)(3) of the CPSA, 15 U.S.C. § 2055(a)(3). The CPSC may not disclose to the public trade secret information or proprietary commercial or financial data. If the Firm does not request confidential treatment at the time of its submission, or within ten days thereafter, the staff will assume that it does not consider information in the submission to be a trade secret or otherwise exempt from disclosure under section 6(a) of the CPSA and under the Freedom of Information Act, 5 U.S.C. § 552(b)(4).

Additional Materials

Information about the CPSA and the CPSC regulation titled “Substantial Product Hazard Reports” (16 C.F.R. Part 1115) can be accessed online using the links below.

- Consumer Product Safety Act – [HYPERLINK "https://www.cpsc.gov/s3fs-public/pdfs/blk_media_cpsa.pdf"]
- Federal Hazardous Substances Act – [HYPERLINK "https://www.cpsc.gov/s3fs-public/pdfs/blk_pdf_fhsa.pdf"]
- 16 C.F.R. Part 1101, Information Disclosure – [HYPERLINK "<http://www.cpsc.gov/en/Newsroom/FOIA/Guide-to-Public-Information>"]
- Substantial Product Hazard Reports – [HYPERLINK "<https://www.gpo.gov/fdsys/pkg/FR-2006-07-25/pdf/E6-11758.pdf>"]
- CPSA Section 6(b) Fact Sheet – [HYPERLINK "https://www.cpsc.gov/s3fs-public/pdfs/blk_pdf_CPSA6bFactSheet.pdf"]
- Section 37 Information Reporting – [HYPERLINK "https://www.cpsc.gov/s3fs-public/pdfs/blk_media_cpsa37.pdf"]
- Recall Guidance – [HYPERLINK "<https://www.cpsc.gov/recallguidance>"]
- Recall Handbook – [HYPERLINK "<https://www.cpsc.gov/s3fs-public/8002.pdf>"]
- Recall Checklist – [HYPERLINK "<https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance/Recall-Checklist>"]

Exhibit M

(FILED UNDER SEAL)

Exhibit N
(FILED UNDER SEAL)

Exhibit O

(FILED UNDER SEAL)

Exhibit P

(FILED UNDER SEAL)

Exhibit Q

(FILED UNDER SEAL)

Exhibit R

(FILED UNDER SEAL)

Exhibit S



PRODUCT SAFETY PLANNING, REPORTING, and RECALL HANDBOOK

See the [Regulated Products Handbook](#) or [Regulatory Robot](#) for guidance on specific regulations.

This handbook was prepared by the CPSC staff, and has not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

U.S. Consumer Product Safety Commission
Office of Compliance & Field Operations
4330 East West Highway
Bethesda, MD 20814
Hotline Telephone: (800) 638-2772
Fax: (301) 504-0359

Reporting:	Inquiries:
Section 15 Reports: Section15@cpsc.gov Section 37 Reports: Section37@cpsc.gov Section 102 Reports: Section102@cpsc.gov	General Inquiries: Compliance@cpsc.gov Small Business Inquiries: sbo@cpsc.gov

www.cpsc.gov

<http://www.saferproducts.gov/>

Contents

Foreword..... 3

Background 3

Plan Ahead: Compliance Programs and Designating Responsibility for Product Safety Issues..... 4

I. Reporting Requirements..... 6

 A. Section 15 Reports..... 6

 B. Section 37 Reports..... 9

 C. Section 102 Reports 10

II. Identifying a Defect..... 11

III. Evaluating Substantial Risk of Injury 12

IV. Hazard Classification..... 13

V. Fast-Track Product Recall Program (No Preliminary Determination of Hazard) 14

VI. Corrective Action Plans (CAPs)..... 15

 A. Preparing for a CAP..... 15

 B. Elements of a Recall 16

VII. Communicating Recall Information 17

 A. Direct and Targeted Notice..... 18

 B. Recall News Releases 19

 C. Recall Alerts 22

 D. Joint Releases with Canada and Mexico..... 22

 E. Digital Recall Marketing 22

 F: Video News Releases..... 24

 G. National News Conference..... 24

 H. Retail Notifications/Posters..... 24

 I. Company Contact Information: Toll-Free Numbers/URL/EMail 25

VIII. Monitoring Recalled Products 26

IX. Keeping Recalled Products Out of Commerce 27

X. Records Maintenance 30

XI. Conclusion..... 31

Appendix A: Developing a Compliance Program 32

Appendix B: Substantial Product Hazard Investigations and Fast-Track Processes..... 37

Appendix C: News Release Templates 38

 Recall News Release Template 38

 Recall News Release with Health Canada Template..... 40

 Fast-Track Recall Template 42

 Fast-Track Recall with Health Canada and/or Profeco 43

 Recall Alert Template..... 46

 Fast-Track Recall Alert Template 47

 Fast-Track Recall Alert with Health Canada Template..... 50

Appendix D: Best Practices for Communicating Recall Information on Social Media 522

Foreword

The U.S. Consumer Product Safety Commission's (CPSC's) Office of Compliance and Field Operations prepared this Recall Handbook to help you understand your obligations and responsibilities under the Consumer Product Safety Act ([CPSA](#)) and other statutes administered by the CPSC. The guidance in this Handbook applies to anyone who manufactures, imports, distributes, or retails consumer products.

No one likes to conduct a recall, but when a safety problem makes a product recall necessary to prevent injuries and save lives, it benefits everyone to move quickly and effectively.

CPSC constantly strives to improve not only the timeliness of recalls, but also the effectiveness of the recall programs we negotiate. The [Fast-Track Product Recall Program \("Fast-Track"\)](#) is designed especially for companies that are willing and able to move quickly with a voluntary recall. Fast-Track, described in detail in Section V of this Handbook, is intended to expedite the recall process by eliminating some of the steps in the traditional recall process, including a preliminary substantial product hazard determination.

If you are seeking information on a specific product regulation, you should begin with the CPSC's [Regulatory Robot](#). You can also consult our Business Education pages on the CPSC [website](#); or, if you are a small business, you can contact our Small Business Ombudsman's Office. Visit the SBO's [Contact Us](#) page, or call toll-free at: (888) 531-9070. If you are seeking guidance on how to address a regulatory violation, refer to the CPSC's [Regulated Products Handbook](#).

CPSC's Office of Compliance and Field Operations
Compliance@cpsc.gov

Note: This handbook does not replace the agency's authorizing statutes or interpretative regulations set out in 16 CFR parts 1115, 1116, and 1117. If there is any discrepancy, the statutes and regulations supersede this Handbook. This material is available on the CPSC's website at: <http://www.cpsc.gov>.

Background

The CPSC is an independent regulatory agency responsible for protecting the public from unreasonable risks of injury and death associated with consumer products. Established by Congress in the Consumer Product Safety Act ([CPSA](#)), 15 U.S.C. §§ 2051-2089, the CPSC has jurisdiction over approximately 15,000 different types of consumer products used in and around the home, in schools, in recreation, and otherwise.¹

This Recall Handbook provides information on the obligations and responsibilities applicable to anyone who manufactures, imports, distributes, retails, or otherwise sells consumer products. The Handbook has three purposes: (1) to explain the reporting requirements under sections 15(b) and 37 of the CPSA, 15 U.S.C. § 2064(b) and § 2084, and Section 102 of the Child Safety Protection Act, Pub. L. No. 103-267, 108 Stat. 722, 6/16/94; (2) to educate stakeholders about how to recognize potentially hazardous consumer products at an early stage; and (3) to assist firms in developing and implementing corrective action plans. The term "corrective action plan" (CAP) generally includes any type of remedial action taken by a company. A CAP, for example, could provide for the return of a product to the manufacturer

¹ The CPSC does not have jurisdiction over foods, drugs, cosmetics, medical devices, firearms and ammunition, boats, motor vehicles, aircraft, or tobacco. Specific questions about the agency's jurisdiction over particular products should be directed to CPSC's Office of the General Counsel.

or retailer for a cash refund or a replacement product; for the repair of a product; and/or for public notice of the hazard. A CAP may include multiple measures that are necessary to protect consumers. When a corrective action requires public announcement and a remedy offered to affected consumers, it is referred to as a “recall.”

This Handbook is not an all-inclusive reference source for developing a CAP. The goal of a CAP should be to remove or correct as many hazardous products as possible from the distribution chain and from consumers, and to do so in the most efficient manner. Reaching this goal often requires creative planning and technology. Companies developing specific CAPs to address unsafe or potentially unsafe products should work closely with CPSC to benefit from staff's expertise in designing and carrying out such plans. This results in greater protection for consumers from injury or death, as well as a more efficient and productive process for companies.

Plan Ahead: Compliance Programs and Designating Responsibility for Product Safety Issues

The first moments after a company becomes aware of a potential product safety issue are critical. However, it is essential to have a plan in place *beforehand*, a plan that details actions to take after obtaining information that a consumer product is noncompliant, contains a defect, or poses an unreasonable risk of serious injury or death.

Part of that plan should include a compliance program establishing policies and procedures for identifying and responding to consumer product safety issues as they arise. CPSC recommends that firms develop and implement a compliance program, because a compliance program will help the firm to be prepared if a product recall, or similar action, becomes necessary. A comprehensive compliance program should focus on the prevention of product safety problems and stress early detection, in addition to prompt reporting.

A. Establish a Compliance Program

A compliance program will help a firm protect consumers from potential hazards through various prevention and mitigation efforts. A compliance program should begin at the design and manufacturing stage, and carry through to a recall, establishing and ensuring implementation of policies and procedures that address prevention, investigation, and reporting procedures, crisis management, mock recalls, and standard reverse logistics protocols during product recalls.

A company with a comprehensive and proactive compliance program is best equipped to prevent product safety issues and is better prepared to handle those issues, if, and when, they arise.

For details see **Appendix A: “Developing a Compliance Program.”**

B. Designate Personnel Responsible for Product Safety Issues

Designating a company official/employee or team responsible for product safety is essential for a firm to ensure product safety and meet statutory reporting requirements. Ideally, this individual (or team) would have full authority to take the steps necessary (including reporting to the CPSC) to initiate and implement all recalls, with the approval and support of the company's chief executive officer, or other appropriate senior management official.

The individual or team responsible should have knowledge of the CPSC statutes, regulations, and guidance for reporting and implementing CAPs, and should be delegated the following authorities and responsibilities:

PRODUCT SAFETY PLANNING, REPORTING, & RECALL HANDBOOK

- Authority to function as the central coordinator for receiving and processing all information regarding the safety of the company's products. Such information includes, but is not limited to: quality control records, engineering analyses, test results, consumer complaints, warranty returns or claims, lawsuits, and insurance claims.
- Responsibility for fully reviewing the company's product line to determine how each product will perform or fail under conditions of proper use and reasonably foreseeable misuse or abuse.
- Authority to involve appropriate staff and functional areas of the firm, and external resources, as appropriate, to implement a product recall, designate another to serve as the sole primary liaison with CPSC, and to designate a single person as the "Recall Coordinator,"² if a recall is warranted;
- Responsibility for making decisions to report and initiate a product recall, and for designating a central point of contact (e.g., recalls@xyzstores.com) for communications to and from manufacturers, importers, and distributors, which is updated regularly. An identified point person can ensure that important notices are sent to the correct department or person; and
- Accountability to the company's chief executive officer, or other appropriate senior official, with the responsibility to keep the CEO informed about reporting requirements and potential safety concerns that could lead to product recalls.

Through research and analysis, product safety engineers can identify the safety features that could be incorporated into products that present safety risks, to reduce the product's potential to cause injury.

C. Create a Product Identification System

Part of effective planning for a potential corrective action in the future includes the creation of a product identification system. Model designations and date-of-manufacture codes should be used on all products, whether they carry the company's name or brand, or are privately labeled for other companies. Manufacturer designations also should be on all products, if there are multiple manufacturers of the same model. If a product recall is necessary, this practice allows the company to identify easily all affected products, without undertaking a costly recall of the entire line. Similarly, once a specific product has been recalled and corrected, a new model number, or other means of identification used on new and/or corrected products, allows distributors, retailers, and consumers to distinguish products subject to the recall from the new items. Until a production change can be made to incorporate a new model number or date code, some companies have used labels or bar codes to differentiate from recalled products, products that have been inspected and corrected.

² If a CAP includes a recall, designating a Recall Coordinator is essential to effective implementation. The company's Recall Coordinator should be responsible for: (1) working directly with CPSC to gain approval of all aspects of the proposed CAP, including notices; (2) keeping the firm's senior management informed about pending product recalls; (3) involving the appropriate internal and external staff and resources to implement a product recall; and (4) submitting monthly progress reports to CPSC after the recall announcement.

I. Reporting Requirements.

A. Section 15 Reports

Section 15(b) of the CPSA establishes reporting requirements for manufacturers, importers, distributors, and retailers of consumer products, distributed in commerce, and over which the agency has jurisdiction.

In enacting Section 15(b), Congress intended to encourage widespread reporting of timely, accurate, and complete information that is necessary to protect public health and safety. In addition to assisting the CPSC in uncovering substantial product hazards, reporting incidents resulting in injury or death helps to identify risks of injury that could be addressed through voluntary or mandatory standards, or inform and educate. **It is important to recognize that a reporting obligation arises even if a firm cannot identify a defect and/or root cause. If the information reasonably supports the conclusion that a product could create an unreasonable risk of serious injury or death, a company must report.**

Although CPSC uses sources other than Section 15 reports to identify potentially hazardous products, reporting by companies under Section 15 can provide the most timely and effective source of information about such products. This is because companies often learn of potential product safety problems at an early stage. Accordingly, companies involved in the manufacture, importation, distribution, or sale of consumer products should develop a system for maintaining and reviewing information about their products that might suggest that their product has a defect or poses an unreasonable risk of serious injury or death. Such information includes, but is not limited to: consumer complaints, warranty returns, insurance claims or payments, product liability lawsuits, reports of production problems, product testing, or other critical analyses of products.

Reporting a product to the CPSC under Section 15 does not automatically mean that the agency will conclude that the product creates a substantial product hazard or determine that corrective action is necessary. CPSC staff will evaluate the report and work with the reporting company to determine whether corrective action is necessary. Many of the reports received require no corrective action because staff concludes that the reported product defect does not create a substantial product hazard.

1. What to Report

Manufacturers, importers, distributors, and retailers must notify the CPSC immediately if they obtain information that reasonably supports the conclusion that a product distributed in commerce: (1) fails to comply with an applicable consumer product safety rule or with a voluntary consumer product safety standard upon which the Commission has relied under Section 9³; (2) fails to comply with any other rule, regulation, standard or ban under the [CPSA](#) or any other Act enforced by the Commission, including: the [Flammable Fabrics Act](#), 15 U.S.C. § 1193-1204; the [Federal Hazardous Substances Act](#), 15 U.S.C. § 1261-1278; the [Children's Gasoline Burn Prevention Act](#), 110 Pub. Law No. 278 (July 17, 2008); the [Virginia Graeme Baker Pool and Spa Safety Act](#), 110 Pub. Law No. 140 (with amendments); the [Poison Prevention Packaging Act](#), 15 U.S.C. § 1471-1476; the [Refrigerator Safety Act](#), 15 U.S.C. § 1211-1214; the [Drywall Safety Act of 2012](#); the [Child Nicotine Poisoning Prevention Act of 2015](#); (3) contains a defect which could create a substantial product hazard; or (4) creates an unreasonable risk of serious injury or death. The Commission has issued

³ As of January 2018, there were two such standards that would require reporting if failure of the voluntary standard occurred—the voluntary standard for chain saws (ANSI B175.1), and the voluntary standard for unvented gas space heaters (ANSI Z21.11.2); See [Appendix to § 1115](#) for more information.

PRODUCT SAFETY PLANNING, REPORTING, & RECALL HANDBOOK

an interpretive regulation at [16 CFR § 1115](#) that explains the reporting obligations. A more detailed discussion of what constitutes a defect or unreasonable risk for purposes of section 15 is contained in [section II](#), (page 11).

Although reporting companies should be prepared to provide the information described below, a report should not be delayed because some of this information is not yet available. The following information should be transmitted as a written initial report, [16 CFR § 1115.13\(c\)](#):

- Identification and description of the product;
- Name and address of the manufacturer and/or importer of the product, if known. If not known, the names and addresses of all known distributors and retailers of the product;
- Nature and extent of the possible defect, the failure to comply, or the risk;
- Nature and extent of injury or risk of injury associated with the product;
- Name and address of the person informing the Commission;
- If reasonably available, the other information specified in [16 CFR § 1115.13\(d\)](#) of the Commission's regulations; and
- A timetable for providing information not immediately available.

Retailers and distributors can satisfy their initial reporting obligations by reporting the information described above to the Office of Compliance and Field Operations through the [Section 15 mailbox](#).⁴ Alternatively, a retailer or distributor can send a written communication to the manufacturer or importer of a product, describing the failure to comply with an applicable regulation, a potential defect, or the risk of injury or death associated with the product; but they must also provide a copy of that communication to the Office of Compliance and Field Operations. A distributor or retailer may also satisfy a reporting obligation by forwarding reportable information received from another company to the Office of Compliance and Field Operations. Section 15(b) requires that a manufacturer, retailer, or distributor must immediately inform the CPSC of a failure to comply, a defect, or such a risk, unless it has actual knowledge that the CPSC has been adequately informed of such failure to comply, defect, or risk because, for example, the manufacturer provided the retailer or distributor a copy of the full report filed with staff. The Commission is “adequately informed” if staff has received the information requested under [16 CFR §1115.12](#) and/or [§1115.13](#), or if the staff has informed the company that staff is adequately informed.

CPSC staff may request additional information to ensure appropriate data are available to determine the level of hazard. In addition to the standard report elements in [16 CFR § 1115.13\(d\)](#), staff may request additional information including, but not limited to:

- Underlying documentation on related reported incidents, complaints, and warranty claims;
- The countries, other than the United States, to which the company distributed the products;
- Premarket and post-market test reports;
- Marketing, advertising, and promotional documents;
- Technical documentation on product design and manufacture, including change orders;
- UPC codes for all models involved;
- Incident and exemplar samples of the product;
- Documentation regarding any deaths reported involving this product, regardless of defect or hazard;
- Information on the foreign manufacturer or component manufacturer; and
- Other relevant information to assess the hazard.

⁴ Retailers and distributors must include all information required by a Section 15 report “insofar as it is known to the retailer or distributor.” [16 CFR §1115.13\(b\)](#).

2. When to Report

Section 15 requires companies to report "immediately." This means that a company must notify the CPSC within 24 hours of obtaining information described in section A.1 ("What to Report"). Guidelines for determining whether a product defect exists, whether a product creates an unreasonable risk of serious injury or death, and whether a report is necessary or appropriate, are provided in [16 CFR § 1115.4-15](#).

Companies frequently contact staff for input to determine if their situation creates a Section 15 reporting requirement. Compliance staff's consistent response is: "When in doubt, report."

A company must report to the CPSC within 24 hours of obtaining reportable information. The CPSC encourages companies to report potential substantial product hazards, even while their own investigations are continuing. However, if a company is uncertain about whether information is reportable, the company can take a reasonable time to investigate the matter. That investigation should not exceed 10 working days, unless the company can demonstrate that a longer time is reasonable under the circumstances. Absent such circumstances, the CPSC will presume that, at the end of 10 working days, the company has received and considered all information that would have been available to it, had a reasonable, expeditious, and diligent investigation been undertaken.

The CPSC considers a company to have obtained knowledge of product safety-related information when that information is received by an employee or official of the company, who may reasonably be expected to appreciate the significance of that information. Once that occurs, under ordinary circumstances, 5 working days is the maximum reasonable time for that information to reach the chief executive officer, or the official assigned responsibility for complying with the reporting requirements. If a firm has information that noncompliance or a defect in a consumer product caused, may have caused, contributed to, or could contribute to, a death or grievous bodily injury, the firm must report, unless it has investigated and determined that the information is not reportable. [16 CFR §1115.12\(d\)](#).

The CPSC evaluates whether a company complied with its statutory obligation to report a defect, unreasonable risk, or violation to the Commission. The CPSC can assess civil penalties against a firm for its knowing failure to file a timely report (a "timeliness case"), or notify the commission of other prohibited acts set out in Section 19 of the CPSA and other Acts administered by the Commission. If a violation is not only knowing, but also willful, criminal penalties can result.⁵ An evaluation of a timeliness case will be based, in part, on what the company actually knew about the hazard posed by the product, or what a reasonable person, acting under the circumstances, should have known about the hazard while exercising due care, including knowledge obtainable upon the exercise of due care to ascertain the truth of representations. Thus, a company is deemed to know what it would have known had it exercised due care in analyzing reports of injury or consumer complaints, or in evaluating warranty returns, reports of experts, in-house engineering analyses, or any other information.

3. Where to Report

A company should file its Section 15 report with the CPSC's Office of Compliance and Field Operations. The report should be filed electronically through the agency's website ([SaferProducts.gov](#)). Alternatively, a company can file its report electronically by email (Section15@cpsc.gov), and include "Section 15" in the subject line. A company should assign the responsibility of reporting to someone with knowledge of the product and knowledge of the reporting requirements of Section 15. The designated individual should have the authority to report to CPSC or raise the issue quickly with an authorized firm representative.

⁵ See CPSA Section 20-21 (15 USC § 2069-2070), Federal Hazardous Substances Act Section 5 (15 USC § 1264), Flammable Fabrics Act Section 7 (15 USC § 1196), and [16 CFR § 1115.22](#).

3. Confidentiality of Reports

The CPSC often receives requests from the public for information reported under Section 15(b). In addition to the requirements of section 6(b)(1) (requiring advance notice and the opportunity for comment), Section 6(b)(5) of the CPSA, [15 U.S.C. § 2055\(b\)\(5\)](#), prohibits the release of such information about a consumer product, unless one of the following circumstances exist: in lieu of proceeding against such product under Section 15(c) or (d) the Commission has accepted in writing a remedial action plan ; a complaint has been issued under section 15(c) or (d) alleging that a product presents a substantial product hazard; the reporting company agrees to the public disclosure; or the Commission publishes a finding that public health and safety require public disclosure with less than 15 days' notice. There are additional considerations that may permit the release of information regarding a product that violates of a mandatory standard.

In addition, a company may claim that information it has submitted contains or relates to a trade secret or is commercial or financial information that is privileged or confidential. To do so, at the time the company submits the information, the company should mark the information "confidential," in accordance with Section 6(a)(3) of the CPSA, [15 U.S.C. § 2055\(a\)\(3\)](#).

If the CPSC receives a FOIA request for information submitted by a firm pursuant to Section 15(b), in responding to such a request the CPSC's Freedom of Information Office will give the company an additional opportunity to claim that the information should not be disclosed to the public because it contains confidential information. In cases where the Section 6(b)(5) prohibition against release does not apply, , CPSC staff will not treat information as exempt from disclosure to the public under Section 6(a) of the CPSA, 15 U.S.C. § 2055(a), and the Freedom of Information Act, absent a specific claim for confidential treatment.

B. Section 37 Reports

[Section 37](#) of the CPSA requires manufacturers of consumer products to report information about settled or adjudicated civil actions.⁶ Within 30 days of the third final settlement or court judgment, manufacturers must report if:

- a particular model of the product is the subject of at least three civil actions filed in federal or state court;
- each lawsuit alleges the involvement of that particular model in a death or in grievous bodily injury—mutilation or disfigurement, dismemberment or amputation, the loss of important bodily functions or debilitating internal disorder, injuries likely to require extended hospitalization, severe burns, severe electric shock, or other injuries of similar severity;
- during one of the 2-year periods specified in the law,⁷ each of the three actions results in either a final settlement involving the manufacturer or in a court judgment in favor of the plaintiff:

⁶ The Commission has issued a rule at [16 CFR § 1116](#), interpreting the requirements of Section 37. The Commission recommends that manufacturers considering whether they have Section 37 reporting obligations refer to that rule and the applicable regulations cited here.

⁷ The periods of time run from January 1 of year 1 to December 31 of the following year (year 2). The list set forth above is illustrative of periods going forward, and does not include prior 2-year periods for which reporting obligations apply.

PRODUCT SAFETY PLANNING, REPORTING, & RECALL HANDBOOK

January 1, 2019 – December 31, 2020,
January 1, 2021 – December 31, 2022,
January 1, 2023 – December 31, 2024,
January 1, 2025 – December 31, 2026,
and continuing for each 2-year period; and

- The manufacturer is a party to, or is involved in the defense of, or has notice of, each action, before entry of the final order, and is involved in discharging any obligation owed to the plaintiff as a result of the settlement or judgment.

1. What to Report

A report under Section 37 must contain:

- The name and address of the manufacturer of the product.
- The model and model number or designation of the product.
- A statement as to whether the civil action alleged death or grievous bodily injury; and in the case of the latter, the nature of the injury. For reporting purposes, the plaintiff's allegations about the nature of the injury are sufficient to require a report, even if the manufacturer disagrees with the allegations.
- A statement about whether the civil action resulted in a final settlement or a judgment in favor of the plaintiff. However, a manufacturer need not provide the amount of a settlement.
- In the case of a judgment in favor of the plaintiff, the name and number of the civil action, and the court in which it was filed.

A manufacturer can also provide additional information, if it chooses. Such information might include a statement about whether the manufacturer intends to appeal an adverse judgment, a specific denial that the information it submits reasonably supports the conclusion that its product caused death or grievous bodily injury, and an explanation regarding why the manufacturer has not previously reported under Section 15.

2. When and Where to Report

A manufacturer must report within 30 days after a judgment or final settlement in the last of the three civil actions. The same is true of any additional lawsuits involving the same model that are settled or adjudicated in favor of the plaintiff during the same 2-year period.

Companies can file Section 37 reports electronically, by emailing them to: Section37@cpsc.gov, and should include "Section 37" in the subject line.

3. Confidentiality of Reports

Under section 6(e) of the CPSA, the CPSC and its employees may not publicly disclose information reported under Section 37, except that such information may be furnished to the reporting manufacturer, or Congress, under certain circumstances. By law, reporting under Section 37 is not an admission of the existence of an unreasonable risk of injury, a defect, a substantial product hazard, an imminent hazard, or any other liability under any statute or common law. Information voluntarily provided that is in addition to information required to be reported under Section 37 is governed by the confidentiality provisions regarding Section 15 reports (see above section A.3).

C. Section 102 Reports

PRODUCT SAFETY PLANNING, REPORTING, & RECALL HANDBOOK

Section 102 of the [Child Safety Protection Act](#) requires that companies report certain choking incidents to the CPSC. Each manufacturer, distributor, retailer, and importer of a marble, a ball with a diameter of 1.75" or less ("small ball"), latex balloon or other small part, or a toy or game that contains such a marble, ball, balloon, or other small part, must report information that reasonably supports the conclusion that:

- 1) a child (regardless of age) choked on such a marble, small ball, balloon, or small part; and
- 2) due to the incident, the child died, suffered serious injury, ceased breathing for any length of time, or was treated by a medical professional.

1. What to Report

The company should report the name and address of the child who choked, and the person who notified the company of the incident; detailed identification of the product; a description of the incident and any resulting injuries or medical treatment; information about any changes made to the product involved, or changes to its labeling or warnings to address the risk of choking; and the details of any public notice, or other planned corrective action. Refer to [16 CFR § 1117](#) for more detailed information about this reporting requirement.

2. When and Where to Report

Section 102 reports must be filed within 24 hours of obtaining the information.

A company must file a Section 102 report with the Office of Compliance and Field Operations electronically by email to: Section102@cpsc.gov and include "Section 102" in the subject line.

3. Confidentiality of Reports

Section 102 reports receive the same confidentiality treatment as information submitted under Section 15 of the CPSA (see section A.3).

II. Identifying a Defect⁸

The Commission's reporting requirements provide information that assists the CPSC in evaluating whether some form of remedial action is appropriate. However, in the absence of a regulation that addresses a specific risk of injury, the product in question must create a substantial product hazard. That is, the product must contain a defect which creates a substantial risk of injury to the public to warrant remedial action. Next, the Handbook discusses the considerations for determining whether a product defect exists and, if so, whether the risk presented by that defect presents a substantial risk of injury.

A defect could result from:

- a manufacturing or production error;
- the design of, or the materials used in, the product
- a product's contents, construction, finish; or
- a product's, packaging, warnings, and/or instructions.⁹

⁸ The reporting requirement in the CPSA requires a firm to notify staff, if the information reasonably supports the conclusion that a product contains a defect that could create a substantial product hazard **or** creates an unreasonable risk of serious injury or death. CPSA Section 15(b). (Emphasis added).

⁹ See [16 CFR § 1115.4](#).

PRODUCT SAFETY PLANNING, REPORTING, & RECALL HANDBOOK

In addition to these factors, we will also consider whether the risk of injury associated with a product is the type of risk which will render the product defective. To make that determination, CPSC staff considers the following factors, as appropriate, and as referenced in [16 CFR § 1115.4](#):

- 1) The utility of the product.
- 2) The nature of the risk of injury that the product presents.
- 3) The necessity of the product.
- 4) The population exposed to the product, and its risk of injury.
- 5) The obviousness of such risk
- 6) The adequacy of warnings and instructions to mitigate the risk
- 7) The role of consumer misuse of the product, and the foreseeability of such misuse
- 8) The Commission's experience and expertise
- 9) The case law interpreting federal and state public health and safety statutes
- 10) The case law in the area of products liability
- 11) Other information relevant to the determination.

We note, however, that not all products that present a risk of injury are defective. A typical kitchen knife is one example. A knife blade must be sharp for a consumer to cut or slice food. The knife's sharpness is not always a product defect, even though some consumers may cut themselves while using the knife. On the other hand, if the handle or blade of a particular knife is prone to breaking that may constitute a defect.

Because a product may be defective even when it is designed, manufactured, and marketed exactly as intended, a company in doubt about whether a defect exists should still report. However, even if the information available to a company does not reasonably support the conclusion that a defect exists, a company must still report if it has information indicating that the product creates an unreasonable risk of serious injury or death. See [15 U.S.C. §2064\(b\)\(4\)](#) and [16 CFR § 1115.6](#). Note that a product may be found to be defective even if it complies with a voluntary or mandatory standard. [16 CFR § 1115.8](#).

Appendix B of this Handbook depicts the processing flow of a standard defect investigation and the Fast-Track Program.

III. Evaluating Substantial Risk of Injury

When a company reports to the CPSC, the Office of Compliance and Field Operations will evaluate whether the product presents a substantial product hazard by considering whether the product contains a defect and whether any alleged defect creates a substantial risk of injury to the public. If staff concludes that the product in question creates a substantial product hazard, staff applies hazard priority standards to classify the severity of the problem.

Section 15(a)(2)¹⁰ lists criteria for determining when a product defect creates a substantial risk of injury. Any one of the following factors could indicate the existence of a substantial risk of injury:

- **Pattern of defect.** The defect may stem from the design, composition, content, construction, finish, or packaging of a product, or from warnings and/or instructions accompanying the product. The conditions under which the defect manifests must also be considered in determining whether the pattern creates a substantial risk of injury.

¹⁰ [15 U.S.C. §2064\(a\)\(2\)](#).

- **Number of defective products distributed in commerce.** A single defective product could be the basis for a substantial product hazard determination if an injury is likely or could be serious. By contrast, defective products posing no risk of serious injury, and having little chance of causing even minor injury, ordinarily would not be considered to present a substantial risk of injury. The number of products remaining with consumers is also a relevant consideration.
- **Severity of risk.** A risk is considered severe if the injuries that have occurred, *or that could occur*, are serious or likely to occur.¹¹ The definition of a *serious injury* is set forth in 16 CFR 1115.5(c) and includes grievous bodily injuries or injuries requiring hospitalization, medical treatment, or missing work or school for more than one day. The *likelihood of an injury* is determined by considering the number of injuries that have occurred, *or that could occur*, the intended or reasonably foreseeable use or misuse of the product, and the population or group (e.g., children, the elderly, or the disabled) exposed to the product.

A substantial product hazard also exists when failure to comply with an applicable consumer product safety rule creates a substantial risk of injury to the public.

IV. Hazard Classifications

The hazard priority system allows CPSC staff to rank defective products uniformly. If staff makes a preliminary determination¹² (PD) that a product creates a substantial product hazard, the hazard priority system also provides guidance on determining the appropriate corrective action.

Class A Hazards

A Class A hazard exists when a risk of death or grievous injury or illness is likely or very likely, or serious injury or illness is very likely.

Class A hazards warrant the highest level of attention. A company should take immediate, comprehensive, and expansive corrective action measures to identify and notify consumers, retailers, and distributors who have the defective product. In addition, the company must act expeditiously to remedy the defect through repair or replacement of the product, refunds, or other measures. A Class A hazard may require additional actions by the company to notify the public; and the associated corrective action plan requires approval by the Commission. In addition, CAPs for products associated with a death, even if unrelated, also require Commission approval.

Class B Hazards

A Class B hazard exists when a risk of death or grievous injury or illness is not likely to occur, but is possible, or when serious injury or illness is likely, or moderate injury or illness is very likely.

¹¹ Generally, a product could create a substantial hazard when consumers are exposed to a significant number of units, or if the possible injury is serious or is likely to occur. Because a company may not know the extent of public exposure, or appreciate the likelihood or severity of potential injury when a product defect first comes to its attention, it should report to the CPSC, even if it is in doubt about whether a substantial product hazard exists.

¹² The decision is preliminary because only the Commission, after a hearing, can make a formal determination that a product is defective and creates a substantial product hazard.

Class C Hazards

A Class C hazard exists when a risk of serious injury or illness is not likely, but is possible, or when moderate injury or illness is not necessarily likely, but is possible.

Regardless of whether a product defect is classified as a Class A, B, or C priority hazard, the common element is that each of these defects creates a substantial product hazard that requires corrective action to reduce that risk of injury.

The priority given to a specific product defect provides a guideline for determining the best way to communicate with owners and users of the defective product and to get them to respond appropriately. Although some companies have exemplary track records in communicating with consumers independently, it is still to a company's advantage to work with CPSC staff, using both the company's and CPSC's skills and resources to conduct an effective product recall.

V. Fast-Track Product Recall Program (No Preliminary Determination of Hazard)

A company that files a Section 15(b) report may wish to make use of an alternative procedure the Commission has established to expedite recalls.¹³ The program is called the "[Fast-Track Product Recall Program](#)." If a company reports a potential product defect, and otherwise meets requirements for timely recall of the product, staff will not make a preliminary determination that the product creates a substantial product hazard.

The Fast-Track Program allows staff and the company to work together on a CAP immediately, rather than spend the time and other resources necessary to investigate the reported defect to determine whether it rises to the level of a substantial product hazard.

To participate in this program, companies must:

- Stop sale¹⁴ of the product immediately;
- Request to participate in the program;
- Agree to publicly announce the recall;
- Provide all of the information required for a Full Report ([16 CFR § 1115.13\(d\)](#)); and
- Submit a proposed CAP that adequately addresses the reported issue, with sufficient time for CPSC staff to analyze any proposed repair, replacement, or refund offer and evaluate all notice material before the implementation (announcement) of the CAP.

Companies that are unable to move quickly may be removed from the program at the discretion of CPSC Compliance staff.

Appendix B of this Handbook depicts the processing flow of a standard substantial product hazard investigation and the Fast-Track Program.

¹³ This program is described in more detail in the *Federal Register* of July 24, 1997, 62 Fed. Reg. 39,827-39,828. <http://www.gpo.gov/fdsys/pkg/FR-1997-07-24/pdf/97-19554.pdf>.

¹⁴ Term "stop sale" is intended to convey a message sent throughout the distribution chain (all distributors *and* retailers), instructing them to stop sale and quarantine products for a pending safety action.

VI. Corrective Action Plans (CAPs)

An effective CAP will mitigate the hazard to consumers and correct or prevent the problem in any future production or similar product. A common component of a CAP is a recall. A recall is the component of a CAP that provides for public notice and a remedy for consumers. Other components of a CAP might include any actions taken to mitigate the potential hazard, as well as changes to design, manufacturing, materials, quality control, warnings, marketing, discontinuing the product, and other actions.

Note: Any product that is associated with a death requires Commission approval of the CAP.

A. Preparing for a CAP

Rarely will any two recall programs be identical. Therefore, companies should be prepared to address issues that invariably arise, such as:

Product, Defect, Scope, and Remedy:

- Consider the defect or failure to comply that causes the product hazard.
- Consider what caused the product defect or failure to comply to occur in the first place.
- Identify the location of the potentially unsafe products, and determine how many are at each level of distribution.
- Notify appropriate regulatory bodies (including CPSC), about the defect or potential safety issue.
- Discontinue production and shipment of the products.
- Review and improve quality control or risk analysis procedures to prevent a similar occurrence in the future.

Company Readiness for a CAP:

- Notify retailers to stop selling the product, and ask them to help identify consumers who own the product.
- Review existing databases to identify potential product owners, *e.g.*, product registration and customer service records.
- Determine the cost to deploy manpower and/or fund an effort to provide replacement parts for defective products, or to exchange them for new products that do not have the problem.
- Develop a plan to ship replacement parts or new units to distributors participating in the product recall or otherwise repair units in their inventory.
- Develop a plan to quarantine and correct returned products. Consider how the product will be reworked, broken down for reclamation of critical components, or destroyed. Develop and implement procedures to ensure proper control and tracking of all defective materials returned in the recall and to ensure they do not reenter the stream of commerce.
- Prepare to monitor the product recall, and provide timely progress reports to the CPSC.

Public Notice:

- Companies should prepare, for CPSC approval, a comprehensive communications plan, including a media plan utilizing direct notice, for communicating the recall. Additional detail on the elements of this comprehensive plan are provided in the following pages. A satisfactory plan will include:
 - A draft news release for CPSC review that announces the recall.

PRODUCT SAFETY PLANNING, REPORTING, & RECALL HANDBOOK

- A plan for other forms of public notice, including social and digital media. This plan will include, for example, outlets such as: news media, paid advertising, mobile notification, and outreach to affinity groups.
- Modifications of the company's website to aid in communicating the recall.
- Drafts of other notice documents, as appropriate, to reach all relevant consumers (e.g., in-store notification/retail poster, print, radio, email, social media, other digital recall marketing).
- Arrange for a toll-free telephone hotline to be used for the recall. Plan for the hotline to handle the number of calls expected after the recall announcement.

The CPSC strongly recommends *a change in model number and UPC* for any new production or repaired products distributed in commerce following a product recall.

See our online guides: [Recall Planning](#), [Recall Checklist](#), and [Guidelines for Retailers and Logistics Providers](#) for more information.

B. Elements of a Recall

A company that undertakes a recall should develop a comprehensive plan that reaches the entire distribution chain and consumers who have the product. The company must design each communication to reach affected parties and consumers, motivate people to respond to the recall, and take the action requested by the company. The company should submit this communication plan (described above under Public Notice) to CPSC staff for approval as part of the CAP. CPSC staff is available to provide additional guidance throughout this process.

Once CPSC staff and a company agree on a remedy to correct a product defect, staff works with the company to fine-tune an effective plan for public notification and implementation of the recall. The information that should be included in a signed CAP is set forth at: [16 CFR § 1115.20\(a\)](#).

The objectives of a recall are:

- 1) To prevent injury or death from defective or violative products;
- 2) To locate all such products as quickly as possible;
- 3) To remove such products from the distribution chain and from the possession of consumers; and
- 4) To communicate to the public in a timely manner accurate and understandable information about the product defect or violation, the hazard, and the corrective action. Companies should design all informational materials to motivate retailers and the media to get the word out and to spur consumers to act on the recall.

In determining what forms of notice to use, the company should consider how the product was marketed, its user population, the estimated useful life of the product, and how the product is most likely to be maintained and repaired. For targeted notice campaigns, it is most effective to use the same platforms and market segmentation as the company used during sales efforts to announce the recall.

CPSC will consider the level of hazard presented by the recalled product when reviewing the proposed CAP, and may request additional or different actions, if appropriate.

Recall outreach should be comprehensive to get the word out to as many consumers as possible. The outreach often will include a variety of elements, such as emails, letters, advertisements, social media, and other technological means.

See our online list of [Recall Notification Types](#) for more information.

Communication with Distributors and Retailers

A company conducting a recall must take particular care to coordinate the notice portion of the recall to ensure that all participating parties, including traditional and online retailers, have sufficient advance notice to be able to carry out the agreed-upon actions. In the recalling company's stop-sale notice to retailers, it should include the reason for the stop-sale, the potential hazard, an estimated date for follow-up correspondence or recall announcement, and any information necessary to identify the product, including the product's UPC(s).

VII. Communicating Recall Information

Communication is a key element of a recall. The goal of recall communications, in almost every instance, is to both warn consumers of a hazard and encourage them to take action to reduce the risk. Because consumers are flooded with messages about products all the time, recall communications are particularly important. Messages must be noticeable enough to break through the clutter, and recognizable enough that consumers know to pay attention and respond effectively. To help companies strike this important balance and to ensure some standardization for consumers' ease-of-understanding, CPSC has developed best practices and expectations for how companies engaged in a recall should notify consumers.

The CPSC strongly encourages companies to use all available communication channels to reach consumers, retailers, and distributors of recalled products and motivate them to respond. As new or innovative methods of notice and means of communication become available, CPSC staff encourages using these methods as well. As discussed above (A. Preparing for a CAP), companies will prepare a comprehensive recall communications plan—including a media plan—for notifying the public (the general public and/or a specific audience) about the recall. The recall communications plan, as part of the CAP, must be approved by CPSC staff.¹⁵ A satisfactory recall communication plan will include specific information on how a company intends to market its recall, including identifying specific media outlets and other targets.

The Word "Recall"

CPSC expects that companies will use the word "recall" to refer to any voluntary action taken pursuant to a CAP that involves removing, repairing, inspecting, discarding, updating, or otherwise altering for safety a product once it has been purchased by a consumer. Although details and circumstances of CAPs and products may differ, the consistent use of the term "recall" is currently the best way to ensure consumers' attention to a safety notice. Should the vocabulary of risk communication evolve to include other words that carry a similar impact, CPSC staff will consider them.

CPSC's headline for recall announcements will include the word "recall." That headline is standard and not negotiable as part of a CAP agreement. When submitting an initial draft release to staff, companies should take care to write in clear and easy-to-understand language, avoiding technical jargon and other information that may make it difficult for consumers to understand the message. CPSC staff will not approve news releases that downplay the hazard or that use language that would make a consumer less likely to participate in the recall. In general, risks and injuries should be described with clarity and not in a way that minimizes the hazard. CPSC staff can provide guidance and examples.

Companies should strive for high consumer participation, and they should draft news releases describing the recall in a manner that will motivate the consumer to take advantage of the remedy. For instance, if the subject product is associated with a risk of death, the word "death" should be used in the headline of the news release.

¹⁵ In the case of recalls where the product is associated with a death, the CAP and all accompanying documents are submitted to the Commission for a vote.

Review of Recall Notices and Timing of Publication: CPSC staff must review and approve all notices to be disseminated. These notices will be discussed in detail in the following pages. Companies must provide staff, in advance, drafts of all notices or other communications to media, customers, and consumers. CPSC should be the first to issue the approved public communication messages; and then, the recalling company should follow, by issuing its own CPSC-approved communication messages.

Checklist of CAP Communications CPSC must approve:

- *Media Plan*
- *News release*
- *Digital/social media postings*
- *Recall webpage*
- *Notices to consumers, retailers, and distributors*
- *Video news release*
- *Scripts for recall customer service*

As indicated below, CPSC has requirements as well as guidance for recalling companies. Some specific types of recall announcements and suggestions for communicating recall information are detailed below.

A. Direct and Targeted Notice

Direct Notice

Direct notice is the most effective method of engaging consumers for recalls.

Direct notice is notice to consumers who are known to have the product. Contact information for direct notice can be obtained from registration cards, sales records, catalog orders, retailer loyalty programs, contracting for service, or other means. Direct notice can also involve working with distributors, dealers, sales representatives, retailers (traditional brick and mortar and online), service personnel, installers, and other persons who may have the ability to contact consumers directly. Even when a company is using direct notice, CPSC may require additional notices to ensure that all affected consumers are notified of the recall.

The content of a direct notice must be approved by CPSC staff, and should follow the requirements and recommendations outlined below. Companies must provide sufficient customer contact information for CPSC to verify later that consumers received the recall communication. (See also subsection C, Recall Alerts, and Section VIII, Monitoring Recalled Products, for more information.)

Companies who can provide direct notice may also have to provide notice to the general public or to specific targeted audiences.

Targeted Notice

In some recall situations, companies may not have individual contact information for all consumers who bought a particular product, but may have contact information for a larger group of customers.¹⁶ For example, Company A cannot identify every purchaser of its product, but it does maintain a loyalty card database of customers who receive

¹⁶ Companies should consult counsel concerning any privacy laws that could impact the use of information for targeted notice.

PRODUCT SAFETY PLANNING, REPORTING, & RECALL HANDBOOK

periodic coupons or other marketing communications. Company A should discuss with CPSC using that targeted list of customers as part of a comprehensive recall strategy. In most instances, CPSC will urge companies to use their entire mailing list—even if the list cannot be narrowed to exact purchasers—on the theory that it is better to reach a wider audience of potentially impacted consumers. Any recall communications sent to consumers in this way must be approved by CPSC staff, and should follow the requirements and recommendations set out in the following pages.

Where targeted notice is by e-mail or postal mail, the notice should feature prominently, at the top of each e-mail, notice and/or cover letter, and on the front of any mailing envelope, the words: "Recall Notice," or "Safety Recall."

Examples of Targeted Notice:

- Loyalty customers of the brand, regardless of whether specific purchasing information is available;
- Regional targeted recall marketing, through local or regional media, for regions with higher sales;
- Notices in product catalogs, newsletters, and other marketing materials;
- Purchased lists or paid access to "Big Data" providers to generate leads;
- Posters on display at other locations where users are likely to visit, such as medical clinics, pediatricians' offices, child care centers, repair shops, equipment rental locations, and others;
- Notices to trade groups, utilities, and home/fire inspectors, as applicable;
- Notices to repair/parts shops;
- Service bulletins;
- Notices included with product replacement parts/accessories;
- Notices to child care centers;
- Notices to thrift stores and other secondhand retailers; and
- Engagement with bloggers or other relevant influencers to share information about relevant recalls.

See our online list of [Recall Notification Types](#) for more information.

See Section VIII, Monitoring Recalled Products for more information.

B. Recall News Releases

For a typical recall, CPSC issues a news release jointly with the company. Compliance staff, with the help of the CPSC's Office of Communications (OCM), works with the recalling company to draft the release. The agreed-upon language for the news release provides the foundation for preparing other notice documents.¹⁷ Companies should not independently issue news releases because they create confusion among the media and public, particularly if CPSC is also issuing a release on the same subject.

News releases from the CPSC can receive wide media attention and increase the response rate of consumers. OCM sends recall news releases to sources including, but not limited to, national wire services, major metropolitan daily newspapers, television and radio networks, periodicals, online news, and social media influencers. CPSC also sends recall news releases to its listserv of consumers and others who have signed up to receive direct notification of product recall news. In addition, CPSC posts recall news releases to its websites: www.cpsc.gov and www.SaferProducts.gov;

¹⁷ Although the news release provides a foundation, the CPSC is not bound to its exact language, as long as any additional messaging meets the statutory requirements of Section 6 of the CPSA. *See box, next page.*

PRODUCT SAFETY PLANNING, REPORTING, & RECALL HANDBOOK

social media; and on CPSC’s recalls app. CPSC reserves the right to publicize a recall—consistent with the agency’s obligations under section 6(b)—to any outlet or in any format.

CPSC uses a template with a standardized format for most releases. This ensures that all critical information is easy to find for consumers, media, and other interested parties. CPSC staff will seek to maintain consistency between releases as appropriate. However, in recalls where a product has been associated with a death or in certain other circumstances, CPSC will often—at staff discretion—use a narrative format release, which must be approved as part of the CAP by majority vote of the Commission. Examples of news release templates are found in Appendix C.

The following page contains a checklist of all items that must appear in a recall news release.

Are there limits to what CPSC says—and where—after a recall is announced?

CPSC staff will work with companies to effectively communicate recalls within the legal requirements of Section 6(b). This includes working collaboratively to draft and refine the joint news release announcing the recall.

CPSC is committed to fulfilling its obligations under 6(b). In addition, the agency may use words and phrases that do not appear in the four corners of the negotiated press release, but are consistent and comply with 6(b)’s requirements of accuracy, fairness, and effectuating the purposes of the Acts the Commission administers.

CPSC may publicize a recall in any manner and at any time. For example, CPSC may grant interviews about the recall, issue social media, convene media calls or conferences, and work with publications to create accurate content about the recall. Decisions of where and how to communicate the recall are made exclusively by CPSC.

By law, CPSC is required to share requested information with certain members of Congress. When doing so, CPSC will communicate that the information being disclosed is confidential—but section 6(b) does not govern members of Congress. If information is inadvertently released despite the agency’s best efforts, the agency may respond to media requests for comment on that information, to the extent necessary to protect or inform the public consistent with the law.

Checklist for Required Items in Recall News Release

(per [16 CFR § 1115.27](#))

	The term “recall” in the headline (16 CFR §1115.27(a)).
	The company’s legal and commonly known trade name, and the city and state and/or country of its headquarters.
	A statement indicating whether the recalling company is the manufacturer (or importer), distributor, or retailer of the product; if the company is not the manufacturer, the statement must specify the name of the manufacturer, and the city and county of its headquarters. In the case of a foreign manufacturer, the statement must specify the identity of the U.S. importer, and its city and state.
	A list of all significant retailers of the product using the commonly known trade name of the product. “Significant” is defined by 16 CFR § 1115.27 , and is determined in the sole discretion of CPSC staff.
	The number of product units affected by the recall (not just those in the hands of consumers), including the number of product units manufactured, imported and/or distributed, and in inventory.
	A description of the product, including product name, the intended consumer population (<i>i.e.</i> , infants, children, or adults), the product’s colors and sizes, model numbers, date codes, SKUs, and tracking labels, and their exact location on the product.
	High-resolution electronic or digital color photographs with clear and appropriate captions (minimum 1MB size) that clearly show identifying features of the product.
	A clear and concise description of the product’s actual or potential hazards that give rise to the recall, including product defect, and the type of hazard or risk (<i>i.e.</i> , laceration, entrapment, burn).
	The month and year that manufacture of the product began and ended, and when retail sales began and ended, for each make and model of the product.
	The approximate retail price or price range.
	A concise summary of all incidents associated with circumstances giving rise to the recall, including number of incidents, property damage due to incidents, injuries and deaths, including age of persons injured and killed.
	A clear description of the remedy available to the consumer, such as a refund, replacement, or repair. Although per 16 CFR § 1115.27(n) , a company may offer remedies including refunds, product repairs, product replacements, rebates, coupons, gifts, premiums, and other incentives, CPSC has determined that to avoid consumer confusion, such remedies should be referred to in the broad categories “refund,” “repair,” or “replacement.”
	Complete and simple instructions for how to participate in the recall.
	Contact information (telephone and email) for an appropriate recall hotline or customer service department. If at any point, the contact information or web URL of the company’s recall webpage changes from the recall news release, the company must notify CPSC staff immediately so the news release can be updated.

PRODUCT SAFETY PLANNING, REPORTING, & RECALL HANDBOOK

Timing of the recall news release: CPSC will work with companies to ensure that all requirements are met and all preparations are completed before announcing the recall. CPSC may request a particular date or time with the company, and may indicate a strong preference to send out the recall news release as a standalone or as part of a package. Typically, that decision will depend, in part, on the nature of the hazard, the popularity of the product, and other factors that CPSC will discuss with the company.

Notification to other companies named in the recall news release: When it is necessary to identify more than one company or product brand name in a recall release (*i.e.*, private labelers, distributors, and retailers), recalling companies are expected to provide adequate notification to the other companies identified before the official release. This notification is intended to announce the recall and to alert the other companies that their names or brands will be used. The recalling company should notify the Compliance Officer or Compliance Attorney once all named companies are notified and specify whether there are any objections from them. If naming a manufacturer, the recalling company must state affirmatively that the company has notified the manufacturer with the final news release and provide information to Compliance staff confirming that the manufacturer has no objections to being named. If such adequate notification of an identified manufacturer has not occurred, the agency will take steps to initiate such notification prior to publication of the news release.

C. Recall Alerts

Recall alerts follow the same format as a recall news release, but to make use of a recall alert, a company must have direct notice capability for all, or nearly all, consumers to whom the firm has sold the product (e.g., by phone, email, U.S. mail, or other means). If direct notice can be used, staff will consider various factors in assessing what additional actions may be necessary. In some circumstances, direct notice may lessen the need for notice to the news media, while in other cases notification to the media will augment the direct notice. As appropriate, even with a recall alert, CPSC may undertake its own efforts to publicize the recall and effectuate the mission of the agency, as required by law.

D. Joint Releases with Canada and Mexico

For recalled products also sold in Canada and/or Mexico, the CPSC recommends reporting to the appropriate governing agency in those countries to coordinate Joint News Releases or Recall Alerts. Consistent with agency policies and practices, CPSC may also notify or coordinate with other governments.

E. Digital Recall Marketing

The last several decades have seen significant changes and advancements to the way companies reach consumers for marketing and advertising products. Those same developments should be reflected in the way companies communicate with consumers about recalls and other important safety issues. It is important for companies to use equally effective digital channels and strategies to market the product and to perform recall notification. Tactics that a firm used successfully to *sell* their products will also be an effective means to reach consumers with notice of a recall. General expectations are discussed below; CPSC communications staff is available to advise companies as CAPs are developed.

Company Website

PRODUCT SAFETY PLANNING, REPORTING, & RECALL HANDBOOK

As a threshold matter, CPSC considers it a best practice for all firms to maintain a recall landing page on their primary website or U.S.-specific website so consumers can readily find information on multiple recalls at the same time. A recall landing page lists all of the company's recalls. Such a page should be easily navigable from the main page or from a relevant secondary page, such as a Customer Service page.

When engaged with CPSC on a recall, companies must post recall announcements to all current websites. This announcement should link to a dedicated recall webpage (not to the general listing of all firm recalls). CPSC staff can provide additional guidance if a company would like to use a standalone website (*e.g.*, ____recall.com) in addition to or instead of the company website.

CPSC staff must review and approve all notices to be disseminated in connection with a recall or recall alert, including recall website/webpage content.

Website notifications are subject to the same requirements as the news release. Companies are also required to:

- Clearly link recall announcements to the company website's first-entry point, such as the consumer home page (not the corporate/shareholder site). The dedicated recall webpage link should appear within the top 1/3 of the company's consumer home page.
- Include the words "recall" and "safety" in the link to the recall information.
- Include all available recall information in the news release.
- Allow consumers to request the remedy directly from the website.
- Convey any additional instructions that consumers need to receive the remedy in plain language and include photos or videos to explain the remedy process clearly.
- Reflect recalls from mergers and acquisitions, *i.e.*, if the company is purchased or merges with another company, existing recalls must be included on the website of the new company or the acquiring company's website with the original brand names.

The CPSC strongly encourages companies to maintain their recall webpage(s) indefinitely. After 120 days, or when the case is closed, companies may remove the dedicated recall webpage link from the top of the company's homepage. If the URL for the recall posting changes, firms must notify the CPSC immediately. Companies should check their recall link quarterly and ensure it is active. Any changes to the URL will be made on CPSC's recall webpage.

See our [Website Notification Guide](#) for more information.

Social Media

Companies are expected to use any and all social media and mobile platforms on which the company maintains a presence¹⁸ including, but not limited to, Facebook, Twitter, YouTube, and Instagram, to notify consumers of the recall. Companies are encouraged to use paid advertising on social media. A [Guide to Best Practices for Communicating Recalls on Social Media](#) can be found in Appendix D.

Requirements for social media notifications:

- Use the terms "recall" and "safety" in the social media messaging about the recall.
- Keep it concise (#Recall hashtag, product name, hazard, remedy).
- Link directly to the dedicated recall webpage from Facebook, Twitter, Instagram Story or other social media notification.

¹⁸ "Maintaining a presence" means that the company has a profile or account on a given platform, even if the company rarely uses that platform.

PRODUCT SAFETY PLANNING, REPORTING, & RECALL HANDBOOK

- Use photos to increase priority on social media feeds and recall views.
- Use videos to give even greater priority on the various platforms, where possible.
- Make the recall a featured post, if possible.
- Use direct messaging to answer recall questions from consumers.

F. Video News Release (VNR)

CPSC encourages firms to produce video news releases for recalls. The video news release complements the written recall news release and gives media footage of the product to help tell the story.

G. National News Conference

CPSC may urge companies to join the agency in a national news conference to announce the recall. Whether to hold a national news conference depends on the recalled product's prominence, number of units, and the hazard. CPSC may request a company's participation in a news conference, or a company can initiate those discussions with the assigned Compliance Officer or Compliance Attorney. CPSC reserves the right to publicize recalls in any manner, consistent with Section 6(b), without company participation.

H. Retail Notifications/Posters

In certain circumstances, retail posters, or an appropriate alternative, can be an effective means of providing continuing notice of recalls to consumers at the locations where they shop, at the points of purchase, or at other locations where consumers will see them.

Guidelines for designing posters and counter cards:

- Keep them BRIEF and eye-catching; in general, a poster requires far fewer words than a news release.
- Describe the hazard, and tell consumers what to do.
- Use color to make the poster stand out.
- Use a print font, size, and color that provide a strong contrast to the background color of the poster.
- Include the terms "safety" and "recall" in the heading.
- Use a good-quality line drawing or photograph of the product, with call-outs identifying product information, such as model numbers and date codes.
- Include the company's toll-free recall telephone number in large-size type at the bottom of the poster.
- Include the phrase, "Post until [date at least 120 days from recall announcement]."
- Consider using posters with tear-off sheets that provide information on the recall for consumers to take home.
- Use a QR code or other mobile scanning code to allow consumers to act on the recall immediately.
- Use retailer's app to disseminate recall information or add reminders.
- Place posters at retail entrances, checkout counters, and at the location where regular or repeat purchase of the item is expected.

Before announcing a recall, the recalling company should contact the companies and individuals responsible for the locations where it wants to display recall posters and obtain permission to post from each company and responsible party. The company should explain the reason for the recall and the contribution to public safety that the posters provide. The company should also:

PRODUCT SAFETY PLANNING, REPORTING, & RECALL HANDBOOK

- Advise retailers and other companies to place the posters in several conspicuous locations in their stores or offices, where customers will see them, e.g., the area where the product was originally displayed for sale, store entrances, waiting rooms in pediatric clinics, and service counters at repair shops. It is not advisable to place recall notices in a separate area specifically designated for customer service because consumers may not visit these areas, unless they have a problem to address.
- Provide sufficient numbers of posters for retailers or others to display in more than one place in each store or location, and provide contact information for ordering additional posters.

See our online guide, "[Create a Recall Poster](#)," for more information. Other alternatives may be acceptable, such as the use of electronic retail "posters" projected on large screens.

I. Company Contact Information: Toll-Free Numbers/URL/Email

A company conducting a recall must provide an email address, a toll-free telephone number (800/888/877/866), and a website URL ("a response system") for consumers to respond to the recall announcement. Generally, this contact information should be dedicated solely to the recall. Historically, CPSC staff has found that most systems set up to handle typical customer relations, or to receive product orders or requests for repairs or accessories, are unable to also respond effectively to callers about recall announcements, particularly during the first few weeks after the initial announcement of the recall.

When establishing a response system to handle a recall, companies should assume a large consumer response, especially during the first several days/weeks. It is easier to scale-back the response system than it is to add more capacity once a recall is announced. If a response system is not effectively equipped, CPSC may contact a company for additional action to comply with its corrective action plan.

Whether an automated system or live operators are used to answer calls, companies should prepare scripts and instructions for responding to questions. Live operators or taped messages should begin by identifying the company and product, and explaining the reason for the recall. Most consumers who hear about a recall by radio, television, or word of mouth will not remember all the information they hear initially. Again, at its beginning, the message should reinforce the need for listeners to act, particularly if the message is lengthy. CPSC staff must approve all scripts before the recall is announced. All automated systems should provide a number for consumers to contact the company for special problems, e.g., problems completing repairs or installing parts.

Reducing Call Volume: Required provision of a website and e-mail for consumers to register to participate in the recall will help reduce call volume and make the call volume more manageable. Companies should also consider offering a call-back service to return calls within 24-48 hours.

See our online guide, "[Hotline Questions and Answers](#)," for additional information.

VIII. Monitoring Recalled Products

Every recall conducted in coordination with staff is monitored by both the recalling company and the CPSC. Among the reasons that recalling companies need to understand and prepare for this monitoring is that the Consumer Product Safety Improvement Act (CPSIA) makes it unlawful for any person to sell, offer for sale, manufacture for sale, distribute in commerce, or import into the United States any consumer product or substance that is subject to a voluntary corrective action taken by the manufacturer, in consultation with the CPSC (CPSA Section 19(a)(2)(B)-(C), 15 U.S.C. section 2068(a)(B)-(C). For more information, see section IX, Keeping Recalled Products Out of Commerce.

CPSC monitors product recalls by:

- Reviewing monthly progress reports submitted by companies to the Office of Compliance and Field Operations using the Monthly Progress Reporting portal. Submitting the information electronically using the required form found on the [Monthly Progress Report System](#)¹⁹ allows CPSC to assess the effectiveness of the company's recall by evaluating the number of products remedied, the number of consumers notified of the recall, and any post-recall announcement incidents and injuries.
- Inspecting companies post-recall to verify and monitor implementation of the corrective actions undertaken.
- Assigning visits by CPSC field staff and state investigators to consumers to confirm receipt of recall notification and to ensure that recalled products are quarantined and no longer being sold.
- Visiting the firm to follow-up on a company's corrective action.
- Verifying disposal or destruction of recalled products. Requests to verify should be submitted in writing, and in advance of scheduling the disposal, to: recalledproductdisposal@cpsc.gov, so that a CPSC investigator can witness disposal, or arrange other means of verifying destruction.
- Assessing a company's request to cease monitoring. When a company determines that the CAP has been implemented to the best of its ability, and that as many products as possible have been removed from the marketplace, the company may submit an updated progress report and request that the CPSC cease monitoring the recall. Staff will review the effectiveness of the CAP, including the numbers and types of notifications made to consumers, the number of products returned and/or corrected, any post-recall incidents/injuries or deaths involving the recalled product, life expectancy of the product, and any other relevant factors, and advise the company whether monitoring may cease.

CPSC staff reserves the right to seek broader corrective action if the plan does not prove effective. Even after active monitoring has ceased, the company should continue to implement the recall plan until as many products as possible have been removed from the marketplace. The company's toll-free number should be maintained, as well as notice of the recall, on its website so consumers can continue to reach the company if they discover a recalled product. *If the company changes or discontinues its toll-free recall number or Web posting, the company must immediately notify the Office of Compliance and Field Operations, and provide a new recall contact number or URL.* If there are changes to the implementation of the CAP, the company should also immediately contact staff. The CPSC maintains the agreed-upon news release announcing the recall on the CPSC's website. Any change in the company's phone number or modification of the obligations under the CAP must be posted on the existing news release.

¹⁹ CPSC will publish information about a firm's progress on its website absent an objection from the firm.

IX. Keeping Recalled Products Out of Commerce

Removing hazardous consumer products from the marketplace is just one part of a CAP. Companies must also take steps to ensure that adequate measures are in place to prevent consumer products that are subject to a voluntary corrective action or recall (recalled products) from entering or re-entering the stream of commerce, after a recall is announced. Failure to do so violates the CPSA and can result in civil or criminal penalties. CPSA sections 20 and 21.

The CPSA provides:

It shall be unlawful for any person to sell, offer for sale, manufacture for sale, distribute in commerce, or import into the United States any consumer product, or other product or substance that is subject to voluntary corrective action taken by the manufacturer, in consultation with the Commission, of which action the Commission has notified the public, or if the seller, distributor, or manufacturer knew or should have known of such voluntary corrective action. [CPSA 19\(a\)\(2\)\(B\)](#).

Companies are better equipped to prevent recalled products from entering the stream of commerce—and avoid penalties under the CPSA—if they have a comprehensive compliance program that contains mechanisms for identifying, quarantining, and removing recalled products from inventory. Recalled products enter commerce for a variety of reasons, all of which are preventable.

CPSC has found that recalled products typically enter the market because of poor communication throughout the supply chain and because compliance programs are not comprehensive, are out of date, or are not consistently followed. Companies can avoid these problems by:

1. Proactively Establishing a Recall Execution Plan

Some companies do not grasp the need for a recall execution plan until they are conducting a recall. It is a best practice to have a comprehensive recall execution plan in place before it is needed. This allows companies and their employees to identify, quarantine, and remove recalled products from all potential streams of commerce quickly and efficiently. The plan should include written policies and procedures that clearly identify the steps to be taken during and after a recall, and that explain the roles of each employee in the process.

2. Ensuring Adequate Communication

Recalled products are often found to have entered commerce due to gaps in communication to all affected entities during the recall process. Effective communication during a recall should include, but not be limited to:

- Early notice and frequent contact among the recalling company and suppliers, distributors and retailers to identify recalled products, and anticipate their quarantine and removal from inventory. This communication should include all subsidiaries, divisions, and third-party logistic providers, and it should be updated regularly to reflect changes in the supply chain;
- Regular management and employee training on what is a recalled product, how should recalled products be quarantined and/or removed from inventory so that the disposition of the recalled products can be accomplished smoothly—whether it is repair/replacement/destruction, per the CAP; and how to establish clear written parameters and expectations with reverse logistics/salvage/liquidation/destruction companies to ensure that recalled products do not reenter the stream of commerce.

3. Implementing Critical Inventory Controls

There are critical high-tech and low-tech inventory controls that can help prevent recalled products from entering or re-entering commerce. Companies should ensure that their Recall Execution Plan includes:

PRODUCT SAFETY PLANNING, REPORTING, & RECALL HANDBOOK

- A robust electronic records system that informs manufacturers of the quantity of recalled products in inventory, in transit, and with retailers;
- Computer systems that communicate with each other, or are integrated;
- Procedures that allow stock keeping units (SKUs) for recalled products to be blocked permanently to prevent employees from overriding SKU blocks;
- Processes/SOPs to prevent quarantined and returned recalled products from being restocked;
- Designated physical space to store quarantined recalled products;
- A system to physically mark recalled products to identify them as such and store them in a quarantined area with clear notification that resale of the quarantined recalled product is illegal; and
- Communication to ensure that all employees know that donating recalled products is illegal.

Developing a Recall Execution Plan

Any entity that manufactures, imports, distributes, or sells consumer products should maintain a recall execution plan in the event of a product recall. This plan will help predetermine the steps to take to ensure recalled products are not in commerce.

Before a Recall:

- Send a stop-sale notice to all entities in the chain of commerce (e.g. importers, retailers, and distributors), notifying them of the pending recall. Companies should give notice to affected entities well in advance of the public announcement of the recall.
- Perform an audit or test current systems and processes (see section below).
- Review electronic inventory systems to ensure that the systems communicate.
- Identify improvements that would assist in tracking and appropriately blocking SKUs of recalled products. Assign a permanent location for quarantined recalled products. Ideally, access to the area is limited and signs are posted indicating the reason for quarantine. If a recalled product is to be re-worked or repaired, establish a marking and inventory system to distinguish easily recalled product from repaired product. Maintain a log for units moving in or out of quarantine.
- Provide refresher training to employees or develop recall-response training for employees. The training should set expectations, roles, responsibilities, obligations, and timelines for completing the company's recall execution plan. Training should emphasize that selling recalled products is illegal.
- Ensure that recalled products cannot enter any potential post-recall distribution channels, such as donation programs, third party reverse logistics providers, salvage sales, warehouse systems, and Internet sales.
- Assign one employee the responsibility of ensuring that all steps of the recall execution plan are being implemented before and after the recall announcement.
- Run regular (daily is best) reports of any changes to current SKU blocks, any sales of recalled SKUs, and inventory reports for each of the recalled SKUs, and plan what steps to take if there is an implementation issue.

After Issuance or Notice of a Stop-Sale and/or a Pending Recall, Manufacturers, Distributors and Retailers Should Work Together to:

- Remove recalled products from stores, on shelves, on display, in inventory, and at return desks. Physically mark the product as "recalled and illegal to sell, distribute, or donate," and place the items into quarantine.
- Identify any recalled products in transit, including recalled products marked for salvage or liquidation, and make arrangements for recalled products to be placed in quarantine. Make sure that all warehouse and transit facilities have procedures in place to stop the unauthorized shipment of recalled products, as well as procedures for how to handle recalled products.

PRODUCT SAFETY PLANNING, REPORTING, & RECALL HANDBOOK

- Report the number of recalled products in quarantine and in transit to the recalling company, and follow the disposal procedures set forth in the recalling company's corrective action plan.
- Block SKUs from registers. If scanned, the recalled product should not be available for sale. Optimally, you should notify cashiers with a message that the product is recalled and that it is illegal to sell. A generic "do not sell" message does not inform the cashier of the reason the product cannot be sold. The cashier should not have the ability to override the SKU lockout. Assign a new SKU for the repaired or similar new product in the future.
- Block online sales of the recalled product. Remove listing, if appropriate.
- Emphasize in employee training that recalled products should not be sold, and returned recalled products should be moved to the quarantine area. Ensure that the return desk knows not to put recalled products back on the shelves.
- Address any questions or feedback received from the distribution chain, and request that a company make sure that all recalled products have been removed from shelves and quarantined.

When the Recall Is Announced:

- Verify that the recalled product is off shelves, in quarantine, and labeled appropriately.
- Confirm the number of units in transit and the company's arrangements to move the recalled products to quarantine upon arrival.
- Physically segregate and/or mark recalled products: "Recalled: It is a violation of Federal Law to sell this item," or use similar wording.
- Work with the recalling company on a plan to return or destroy recalled products via methods approved by the CPSC.
- Train/retrain employees, as needed, on how to handle recalled product returns. Ensure knowledge of all recall announcements, by registering to the CPSC recall announcement listserv (<https://www.cpsc.gov/Newsroom/Subscribe>).

How to Handle Return or Destruction of Recalled Products:

- Communicate with the manufacturer to determine if the recalled product is to be returned or destroyed (destruction can occur only when approved by the CPSC, and CPSC may want to witness the destruction).
- For off-site destruction – Set clear written instructions for the third-party vendor. Communicate what is being sent, and indicate that the recalled products should not be comingled with other products, or sent to salvage. Clearly mark all boxes and pallets containing recalled products. Request a certification of destruction upon completion.
- For on-site destruction (at retailer or distributor) - If approved by CPSC, and instructed by the recalling company, obtain a report certifying the destruction. An affidavit is preferred but, at a minimum, a signed statement, including the date, stating which recalled products were destroyed, the number of recalled products destroyed, and the name of the employee who performed the destruction, signed by the employee who performed the destruction and a witness. Inventory systems should be updated to reflect the destruction.
- If the recalled products are being returned to the recalling company, clearly mark all boxes and pallets containing recalled products.

Perform an Audit to Test the Recall Execution Plan:

- Perform an audit to test the effectiveness of a stop-sale and/or Recall Execution Plan at your facilities using a test SKU.

PRODUCT SAFETY PLANNING, REPORTING, & RECALL HANDBOOK

- Test communication systems between facilities by simulating a recall announcement to each facility, and ask each facility to verify receipt and follow-up instructions.
- Check to ensure the quarantine area is being used appropriately or is available at each location, and confirm that returned Recalled Products make it to the appropriate location in quarantine.
- Train employees at all facilities (including but not limited to retail locations) about what to do when they receive a return of a Recalled Product.
- Confirm that computer systems are functioning as designed, and confirm that access to the appropriate information to identify current stock, lock out Recalled Products, and identify Recalled Products as quarantined.
- Run a report to identify all sales, donations, sales or transfers for salvage, Internet sales, and outlet store sales. Ensure that information can be accessed and that sales can be determined. Identify shortfalls or areas for improvement, and update the compliance program accordingly.

If Recalled Products Have Entered Commerce:

- Report to the CPSC immediately through the firm's assigned Compliance Officer or Compliance Attorney and section15@cpsc.gov.
- Reinforce the stop-sale notification and reverse logistics process to ensure they are properly in place.
- Change the reverse logistics program to address any shortcomings that allowed the Recalled Products to return to the market. Depending on the circumstances, understand that re-announcing the recall may be necessary.

X. Records Maintenance

The goal of any product recall is to retrieve, repair, or replace products already in consumers' hands, as well as those in the distribution chain. Maintaining accurate records about the design, production, distribution, and marketing of each product for the duration of its expected life is essential for a company to conduct an effective, economical product recall. Generally, the following records are important to identify product defects and conduct recalls:

- 1) **Records of complaints, warranty returns, insurance claims, and lawsuits.** These types of information often highlight or provide early notice of safety problems that may become widespread in the future.
- 2) **Production records.** Accurate data should be kept on all production runs—the lot numbers and product codes associated with each run, the volume of units manufactured, component parts or substitutes used, and other pertinent information that will help the company identify quickly defective products or components.
- 3) **Distribution records.** Data should be maintained about the location of each product by product line, production run, quantity shipped or sold, dates of delivery, and destinations.
- 4) **Quality control records.** Documenting the results of quality control testing and evaluation associated with each production run often helps companies identify possible flaws in the design or production of the product. It also aids the company in charting and more precisely defining the scope of a CAP.
- 5) **Product registration cards.** Product registration cards for purchasers of products to fill out and return are an effective tool to identify owners of recalled products. The easier it is for consumers to fill out and return these cards, the greater the likelihood the cards will be returned to the manufacturer. For example, some companies provide pre-addressed, postage-paid registration cards with pre-printed product identification information, *e.g.*, model number, style number, special features, on the card. Providing an incentive can also increase the return rate. Incentives can be coupons towards the purchase of other products sold by the company, free accessory

products, or entry into a periodic drawing for a product give away. The information from the cards should be maintained in a readily retrievable database for use if a recall becomes necessary.

XI. Conclusion

Proactive planning, reporting in a timely manner, taking effective steps to mitigate the hazard, appropriate announcement and dissemination of recall materials, and vigilant efforts to keep recalled products out of commerce are all essential to an effective corrective action. We hope that this guide provides useful information to help companies implement effective recalls.

For additional information on recall guidance, visit the CPSC's website at: www.cpsc.gov (click on "Menu" and then "Recall Guidance"). If you have additional comments or questions, please contact the Office of Compliance and Field Operations at: compliance@cpsc.gov.

Appendix A: Developing a Compliance Program

A compliance program should cover the life of a consumer product, from the design and manufacturing stage, through sales and distribution, and to a recall, if necessary. A compliance program may include policies and processes for addressing prevention of safety issues, crisis management, investigation and reporting procedures, mock recalls, and standard reverse logistics protocols during product recalls.

Every company should design a program based on its own structure, communicate that program to all employees, and assess the program regularly, to see if and how it can be improved or updated to reflect changes in the company's supply, distribution, and sales chains.

Why do you need a program?

There are many reasons to implement a compliance program:

- *Consumer protection:* By having the information available to identify and respond quickly to product safety issues, a compliance program helps prevent injury to your customers.
- *Product improvement:* A compliance program promotes robust design and testing of products during development and in the manufacturing/assembly process.
- *Early detection and correction of problems:* Compliance programs promote early detection of potentially unsafe product designs, manufacturing processes, and unsafe use conditions.
- *Efficiency in reporting and compliance:* Facilitates efficient and effective implementation of CPSC reporting obligations and CAPs, including recalls and reverse logistics.
- *Avoidance of civil penalties:* When seeking civil penalties, CPSC considers, among other factors, whether the company had a:
 - Reasonable and effective program or system for collecting and analyzing information related to safety issues, and
 - History of noncompliance.

How do you start a Compliance Program?

As a starting point, companies should emphasize the three “Cs” of a Compliance Program: Culture, Communication, and Continuous Improvement.

1. **Culture.** Establishing a culture of safety at a company requires a proactive approach that implements training and testing at the early stages of product development, and carries through the life of the product from manufacture, through distribution, and to any possible recall.
2. **Communication:** Ensure that safety expectations are effectively disseminated throughout the company, from entry level employee to top management. Develop a protocol for collecting information that could impact product safety and for elevating it to company individuals with authority to file reports to the CPSC.
3. **Continuous Improvement:** A compliance program should be dynamic; once established, it should be informed by experience. Identified shortcomings are an opportunity to improve the program.

PRODUCT SAFETY PLANNING, REPORTING, & RECALL HANDBOOK

One approach to developing a compliance program may look like this:

1. Identify who in senior management is responsible for product safety issues at the company.
2. Research and create written policies and procedures to respond to product safety issues.
 - a. Identify and centralize data for availability and review by the product safety team.
 - b. Establish regular data reviews, and as appropriate, specific incident reviews.
 - c. Establish or refine supplier qualifications and audits.
 - d. Incorporate CPSC reporting requirements and recall execution plans into policies.
 - e. Establish a protocol for specific follow-up action.
3. Establish a records-retention policy: CPSC staff recommends retaining records for at least 5 years.
4. Train staff regularly.
5. Routinely reevaluate and update compliance policies and training.

What Information Should a Compliance Program Capture and Analyze?

There are various sources of information that firm's should capture and analyze as part of a compliance program. In collecting information, think globally: If the product is sold outside the United States, information about its use, experience, performance, design, or manufacture should be considered. 16 CFR §1115.12.

These sources include:

- Engineering, quality control, or production data
- Information about safety-related production or design changes
- Product liability lawsuits and/or claims for personal injury and damage
- Information from an independent testing laboratory
- Incident complaints from consumers or consumer groups
- Information received from the CPSC (360 reports) or other governmental agencies
- Requests to return a product or for replacement or credit
- Warranty claims
- Product repairs or returns
- Premarket and production testing
- Compliance with applicable mandatory and voluntary safety standards.

16 CFR § 1115.12 and 16 CFR § 1119.4.

Other information that should be captured in a compliance program (and which impose reporting obligations) include the items set forth in Section I A-C, *infra* (pages 6 – 11):

What should the product safety team do with the information it collects?

A safety team should assess the information to determine whether the information requires a report to the CPSC under CPSA Section 15(b). A company is required to report immediately (within 24 hours) when it obtains information which reasonably supports the conclusion that a consumer product:

- Fails to comply with an applicable consumer product safety rule or a voluntary standard which is relied on under **Section 9** (of the CPSA),

PRODUCT SAFETY PLANNING, REPORTING, & RECALL HANDBOOK

- Fails to comply with any other **rule, regulation, standard or ban under the CPSA** or other acts enforced by the CPSC,²⁰
- Contains a **defect** which could create a **substantial product hazard**, or
- Creates an **unreasonable risk of serious injury or death**.

The Safety Team should assess:

Is there a defect?

A company should collect all available information and analyze it to determine whether the information reasonably suggests the existence of a defect ([16 CFR § 1115.4](#)). See [Sections II](#) infra.

Does the defect create a substantial risk of injury?

The safety committee should assess whether the defect or noncompliance creates a substantial risk of injury to the public. Refer to [Section III](#) infra (pages 12 to 13), for direction on how to conduct that assessment.

If you don't find a defect, are you done?

No, you still need to evaluate whether the information reasonably supports the conclusion that the product creates an unreasonable risk of serious injury²¹ or death. If an unreasonable risk of serious injury or death is possible, you should report. *Do not wait for a serious injury or death to occur before reporting.* [16 CFR §1115.6](#).

What Information Should You Consider When Assessing an Unreasonable Risk?

- Reports from experts;
- Test reports;
- Product liability lawsuits or claims;
- Consumer or customer complaints;
- Quality control data;
- Scientific or epidemiological studies;
- Reports of injury;
- Information from other companies or governmental entities;
- Other relevant information;
- Judgment: "The CPSC will attach considerable significance if a company learns that a court or jury has determined that one of its products has caused a serious injury or death and a reasonable person could conclude . . . that the product creates an unreasonable risk of serious injury or death." [16 CFR §1115.6](#).

²⁰ A firm should always monitor to ensure compliance with standards. If you obtain information that your product violates a mandatory standard, you should immediately report. However, even if your product complies with a mandatory standard, you may still need to report, if the information reasonably suggests that the product contains a defect.

²¹ A "serious injury" is defined as:

- A grievous bodily injury [16 CFR §1115.12\(d\)](#);
- Injury necessitating hospitalization requiring actual medical or surgical treatment;
- Fractures, lacerations requiring sutures, concussions, injuries to the eye/ ear/internal organs requiring medical treatment, and injuries necessitating absence from school or work of more than one day. [16 CFR §1115.6\(c\)](#).

Refining and Improving your Compliance Program²²

Step 1: Establish a culture of safety as the foundation

- a. Provide regular, recurring training on how to respond to product safety issues.
- b. Practice, audit, and improve your systems and processes to respond to product safety issues.

Step 2: Create written standards and policies

- a. Tailor the program to your company's specific needs.
- b. Increase staff awareness and training on these policies.
- c. Ensure that other relevant parties in the distribution chain (suppliers, distributors) are aware of the program and understand its requirements regarding their roles.
- d. Improve and refine your policies over time.
- e. Create a recall execution plan (see CPSC guidance, and ISO 10377, 10393, 19600, and 31000).

Step 3: Ensure Supplier qualifications and audits

- a. Make safety a priority at the design stage (See CPSC's "[Handbook for Manufacturing Safer Consumer Products](#)").
- b. Conduct adequate and relevant premarket and production testing to ensure products meet or exceed safety requirements of relevant mandatory and voluntary safety standards.
- c. Exercise due care when relying on a supplier, by taking affirmative steps, such as:
 - i. including contractual provisions requiring compliance with specifications and quality programs;
 - ii. visiting manufacturing locations;
 - iii. spot-checking products for ongoing compliance with safety requirements.
- d. Conduct regular audits to confirm compliance within your company and among your suppliers.

Step 4: Establish an information-collection protocol

- a. Establish systematic procedures for collecting the information to be reviewed and evaluated for potential safety issues.
- b. Consider multiple sources of information.
- c. Types of incident information/samples to collect:
 - i. date of report;
 - ii. consumer contact information (name, address, email, and phone);
 - iii. product name, make, model, serial number, date code, and any other identifying information on the product or packaging;
 - iv. incident details, such as date of incident, surrounding circumstances, whether an injury was sustained, and if so, if medical attention was sought; and
 - v. incident samples, if available.

Step 5: Create a central database

- a. Establish a central database to track information:
 - i. Set up a system to capture all incidents, and route potential safety-related incidents to the compliance team.
 - ii. Make sure your databases speak to one another.
 - iii. Ensure that employees are trained to recognize safety-related issues so they are prepared to elevate these issues to management as soon as they see them.

²² This section is based on information provided during the 2018 Compliance Seminar and the presentation, "10 Steps to an Effective Compliance Program."

PRODUCT SAFETY PLANNING, REPORTING, & RECALL HANDBOOK

- iv. Have a system in place to analyze regularly what is contained in the database to ensure that issues are identified and addressed as soon as possible.

Step 6: Create a system for employee reporting

- a. Make employees comfortable in reporting safety issues; create a confidential path for sensitive issues.
- b. Ensure that information gets to the right people in your organization, based on its structure and roles and responsibilities.

Step 7: Prioritize senior management responsibility for compliance

- a. It is essential to maintain a culture that emphasizes and values product safety, compliance with CPSC safety requirements and voluntary standards, and a comprehensive quality assurance program.
- b. Oversight of compliance by the company's responsible official will facilitate prompt disclosure to senior management of any deficiencies and foster consistent decision making.
- c. Develop a mechanism for elevating product safety reports to senior management.

Step 8: Incorporate CPSC reporting requirements

- a. Understand your legal responsibility to **report** information to the CPSC about the product, if it:
 - i. fails to comply with a CPSC rule, regulation, standard or ban;
 - ii. contains a defect which could create a substantial product hazard;
 - iii. creates an unreasonable risk of serious injury or death.
- b. Keep up with the CPSC's new and updated regulations through e-mail notification: www.cpsc.gov/email.

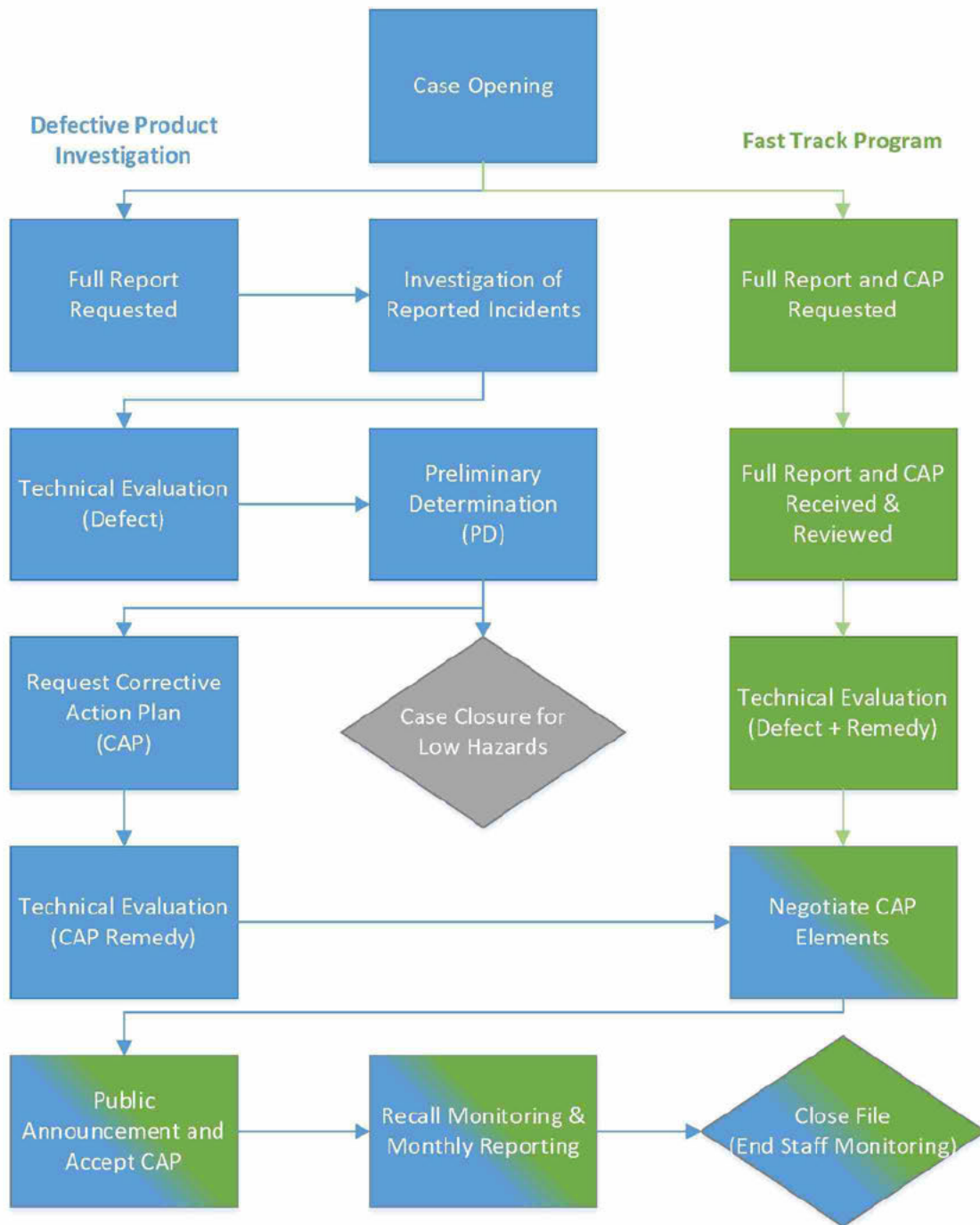
Step 9: Include reverse logistics in the recall execution plan

- a. Develop a standard recall execution and reverse logistics plan.
- b. Understand the system(s) of product distribution and the potential challenges in executing a recall, and develop an implementation plan accordingly.
- c. Regularly review the plan for effectiveness. Common reverse logistics mistakes include:
 - i. SKUs are reused;
 - ii. Computer systems do not communicate with each other;
 - iii. No single individual is identified as the point person for the recall;
 - iv. Inventory reports for recalled SKUs are not regularly conducted;
 - v. Sales reports for recalled SKUs are not regularly conducted; and
 - vi. Register prompts were unclear.

Step 10: Maintain Records

- a. Establish a records retention system:
 - i. CPSC staff recommends keeping all compliance-related records for at least 5 years.
 - ii. If you are upgrading systems, make sure you can access legacy data.
- b. Retention of documents can help identify actions to ensure future safety and compliance.
- c. In the event of a product recall, documentation helps CPSC understand the efforts you made to provide safe consumer goods, what went wrong, and how it has been corrected.

Appendix B: Substantial Product Hazard Investigations and Fast-Track Processes



Note: This chart reflects a typical process flow in defective product investigations handled by Compliance Enforcement and Litigation, and Fast Track Program recalls. These processes may be adapted to the circumstances of a case, as necessary, to respond to specific product safety issues.

Appendix C: News Release Templates

Appendix Contents

Recall News Release.....	38
Recall News Release with Health Canada.....	40
Fast-Track Recall News Release.....	42
Fast-Track Recall News release with Health Canada and/or Profeco.....	44
Recall Alert.....	46
Fast-Track Recall Alert.....	48
Fast-Track Recall Alert with Health Canada and/or Profeco.....	50

Recall News Release Template



U.S. Consumer Product Safety Commission – Recall

Release Date: MONTH DAY, YEAR

Release Number: FY-DRAFT

FIRM NAME Recalls GENERIC PRODUCT NAME Due to XXX Hazard(s)

Recall Summary

Name of Product:

Hazard:

Remedy: Refund/Repair/Replace

Consumers should immediately stop using the recalled XXX, and contact the firm for a full refund/free repair/free replacement.

Consumer Contact: FIRM toll-free at XXX-XXX-XXXX from X a.m. to X p.m. ET/CT/PT Monday through Friday, or online at www.XXX.com, and click on XXX at the bottom of the page for more information.

Recall Details

Units: About X

Description:

Incidents/Injuries:

Sold at: XXX stores nationwide and online at XXXX from MONTH YEAR through MONTH YEAR for about \$XX.

Importer:

Distributor:

Manufacturer:

Manufactured in:

Photos

About the U.S. CPSC

The U.S. Consumer Product Safety Commission (CPSC) is charged with protecting the public from unreasonable risks of injury or death associated with the use of thousands of types of consumer products. Deaths, injuries, and property damage from consumer product incidents cost the nation more than \$1 trillion annually. CPSC's work to ensure the safety of consumer products has contributed to a decline in the rate of injuries associated with consumer products for nearly 50 years.

Federal law bars any person from selling products subject to a publicly announced voluntary recall by a manufacturer or a mandatory recall ordered by the Commission.

For lifesaving information:

- Visit CPSC.gov.
- Sign up to receive our [e-mail alerts](#).
- Follow us on [Facebook](#), Instagram [@USCPSC](#) and Twitter [@USCPSC](#).
- Report a dangerous product or a product-related injury on www.SaferProducts.gov.
- Call CPSC's Hotline at 800-638-2772 (TTY 301-595-7054).
- Contact a [media specialist](#).

Recall News Release with Health Canada Template



U.S. Consumer Product Safety Commission – Recall with Health Canada

Release Date: MONTH DAY, YEAR

Release Number: FY-DRAFT

FIRM NAME Recalls GENERIC PRODUCT NAME Due to XXX Hazard(s)

Recall Summary

Name of Product:

Hazard:

Remedy: Refund/Repair/Replace

Consumers should immediately stop using the recalled XXX, and contact the firm for a full refund/free repair/free replacement.

Consumer Contact: FIRM toll-free at XXX-XXX-XXXX from X a.m. to X p.m. ET/CT/PT Monday through Friday, or online at www.XXX.com, and click on XXX at the bottom of the page for more information.

Recall Details

Units: About XX (In addition, X in Canada)

Description:

Incidents/Injuries:

Sold at: XXX stores nationwide and online at XXXX from MONTH YEAR through MONTH YEAR for about \$XX.

Importer:

Manufacturer:

Manufactured in:

Note: Health Canada's news release is available at:

Photos

About the U.S. CPSC

The U.S. Consumer Product Safety Commission (CPSC) is charged with protecting the public from unreasonable risks of injury or death associated with the use of thousands of types of consumer products. Deaths, injuries, and property damage from consumer product incidents cost the nation more than \$1 trillion annually. CPSC's work to ensure the safety of consumer products has contributed to a decline in the rate of injuries associated with consumer products for nearly 50 years.

Federal law bars any person from selling products subject to a publicly announced voluntary recall by a manufacturer or a mandatory recall ordered by the Commission.

For lifesaving information:

- Visit CPSC.gov.
- Sign up to receive our [e-mail alerts](#).
- Follow us on [Facebook](#), Instagram [@USCPSC](#) and Twitter [@USCPSC](#).
- Report a dangerous product or a product-related injury on www.SaferProducts.gov.
- Call CPSC's Hotline at 800-638-2772 (TTY 301-595-7054).
- Contact a [media specialist](#).

Fast-Track Recall Template



U.S. Consumer Product Safety Commission – Fast-Track Recall

Release Date: MONTH DAY, YEAR

Release Number: FY-DRAFT

FIRM NAME Recalls GENERIC PRODUCT NAME Due to XXX Hazard(s)

Recall Summary

Name of Product:

Hazard:

Remedy: Refund/Repair/Replace

Consumers should immediately stop using the recalled XXX, and contact the firm for a full refund/free repair/free replacement.

Consumer Contact: FIRM toll-free at XXX-XXX-XXXX from X a.m. to X p.m. ET/CT/PT Monday through Friday, or online at www.XXX.com, and click on XXX at the bottom of the page for more information.

Recall Details

Units: About XX

Description:

Incidents/Injuries:

Sold at: XXX stores nationwide and online at XXXX from MONTH YEAR through MONTH YEAR for about \$XX.

Importer:

Distributor:

Manufacturer:

Manufactured in:

Photos



This recall was conducted voluntarily by the company under CPSC's Fast-Track Recall process. Fast-Track recalls are initiated by firms that commit to work with CPSC to quickly announce the recall and remedy to protect consumers.

About the U.S. CPSC

The U.S. Consumer Product Safety Commission (CPSC) is charged with protecting the public from unreasonable risks of injury or death associated with the use of thousands of types of consumer products. Deaths, injuries, and property damage from consumer product incidents cost the nation more than \$1 trillion annually. CPSC's work to ensure the safety of consumer products has contributed to a decline in the rate of injuries associated with consumer products for nearly 50 years.

Federal law bars any person from selling products subject to a publicly announced voluntary recall by a manufacturer or a mandatory recall ordered by the Commission.

For lifesaving information:

- Visit CPSC.gov.
- Sign up to receive our [e-mail alerts](#).
- Follow us on [Facebook](#), Instagram [@USCPSC](#) and Twitter [@USCPSC](#).
- Report a dangerous product or a product-related injury on www.SaferProducts.gov.
- Call CPSC's Hotline at 800-638-2772 (TTY 301-595-7054).
- Contact a [media specialist](#).

Fast-Track Recall with Health Canada and/or Profeco



U.S. Consumer Product Safety Commission – Fast-Track Recall with Health Canada and/or Profeco

Release Date: MONTH DAY, YEAR

Release Number: FY-DRAFT

FIRM NAME Recalls GENERIC PRODUCT NAME Due to XXX Hazard(s) (Recall Alert)

Recall Summary

Name of Product:

Hazard:

Remedy: Refund/Repair/Replace

Consumers should immediately stop using the recalled XXX, and contact the firm for a full refund/free repair/free replacement. The firm is contacting all known purchasers directly.

Consumer Contact: FIRM toll-free at XXX-XXX-XXXX from X a.m. to X p.m. ET/CT/PT Monday through Friday, or online at www.XXX.com, and click on XXX at the bottom of the page for more information.

Recall Details

Units: About XXX (in addition, about XXX were sold in Canada, and about XXX were sold in Mexico)

Description: This recall involves . . .

Incidents/Injuries:

Sold at: XXX stores nationwide and online at XXXX from MONTH YEAR through MONTH YEAR for about \$XX.

Importer:

Distributor:

Manufacturer:

Manufactured in:

Note: Health Canada's news release is available at:
Profeco's news release is available at:

Photos



This recall was conducted voluntarily by the company under CPSC's Fast-Track Recall process. Fast-Track recalls are initiated by firms that commit to work with CPSC to quickly announce the recall and remedy to protect consumers.

About the U.S. CPSC

The U.S. Consumer Product Safety Commission (CPSC) is charged with protecting the public from unreasonable risks of injury or death associated with the use of thousands of types of consumer products. Deaths, injuries, and property damage from consumer product incidents cost the nation more than \$1 trillion annually. CPSC's work to ensure the safety of consumer products has contributed to a decline in the rate of injuries associated with consumer products for nearly 50 years.

Federal law bars any person from selling products subject to a publicly announced voluntary recall by a manufacturer or a mandatory recall ordered by the Commission.

For lifesaving information:

- Visit CPSC.gov.
- Sign up to receive our [e-mail alerts](#).
- Follow us on [Facebook](#), Instagram [@USCPSC](#) and Twitter [@USCPSC](#).
- Report a dangerous product or a product-related injury on www.SaferProducts.gov.
- Call CPSC's Hotline at 800-638-2772 (TTY 301-595-7054).
- Contact a [media specialist](#).

Recall Alert Template



U.S. Consumer Product Safety Commission – Recall Alert

Release Date: MONTH DAY, YEAR

Release Number: FY-DRAFT

FIRM NAME Recalls GENERIC PRODUCT NAME Due to XXX Hazard(s) (Recall Alert)

Recall Summary

Name of Product:

Hazard:

Remedy: Refund/Repair/Replace

Consumers should immediately stop using the recalled XXX, and contact the firm for a full refund/free repair/free replacement. The firm is contacting all known purchasers directly.

Consumer Contact: FIRM toll-free at XXX-XXX-XXXX from X a.m. to X p.m. ET/CT/PT Monday through Friday, or online at www.XXX.com, and click on XXX at the bottom of the page for more information.

Recall Details

Units: About X

Description:

Incidents/Injuries:

Sold at: XXX stores nationwide and online at XXXX from MONTH YEAR through MONTH YEAR for about \$XX.

Importer:

Distributor:

Manufacturer:

Manufactured in:

Photos

About the U.S. CPSC

The U.S. Consumer Product Safety Commission (CPSC) is charged with protecting the public from unreasonable risks of injury or death associated with the use of thousands of types of consumer products. Deaths, injuries, and property damage from consumer product incidents cost the nation more than \$1 trillion annually. CPSC's work to ensure the safety of consumer products has contributed to a decline in the rate of injuries associated with consumer products for nearly 50 years.

Federal law bars any person from selling products subject to a publicly announced voluntary recall by a manufacturer or a mandatory recall ordered by the Commission.

For lifesaving information:

- Visit CPSC.gov.
- Sign up to receive our [e-mail alerts](#).
- Follow us on [Facebook](#), Instagram [@USCPSC](#) and Twitter [@USCPSC](#).
- Report a dangerous product or a product-related injury on www.SaferProducts.gov.
- Call CPSC's Hotline at 800-638-2772 (TTY 301-595-7054).
- Contact a [media specialist](#).

Fast-Track Recall Alert Template



U.S. Consumer Product Safety Commission – Fast-Track Recall Alert

Release Date: MONTH DAY, YEAR

Release Number: FY-DRAFT

FIRM NAME Recalls GENERIC PRODUCT NAME Due to XXX Hazard(s) (Recall Alert)

Recall Summary

Name of Product:

Hazard:

Remedy: Refund/Repair/Replace

Consumers should immediately stop using the recalled XXX and contact the firm for a full refund/free repair/free replacement. The firm is contacting all known purchasers directly.

Consumer Contact: FIRM toll-free at XXX-XXX-XXXX from X a.m. to X p.m. ET/CT/PT Monday through Friday, or online at www.XXX.com and click on XXX at the bottom of the page for more information.

Recall Details

Units: About XX

Description:

Incidents/Injuries:

Sold at: XXX stores nationwide and online at XXXX from MONTH YEAR through MONTH YEAR for about \$XX.

Importer:

Distributor:

Manufacturer:

Manufactured in:

Photos



This recall was conducted voluntarily by the company under CPSC's Fast-Track Recall process. Fast-Track recalls are initiated by firms that commit to work with CPSC to quickly announce the recall and remedy to protect consumers.

About the U.S. CPSC

The U.S. Consumer Product Safety Commission (CPSC) is charged with protecting the public from unreasonable risks of injury or death associated with the use of thousands of types of consumer products. Deaths, injuries, and property damage from consumer product incidents cost the nation more than \$1 trillion annually. CPSC's work to ensure the safety of consumer products has contributed to a decline in the rate of injuries associated with consumer products for nearly 50 years.

Federal law bars any person from selling products subject to a publicly announced voluntary recall by a manufacturer or a mandatory recall ordered by the Commission.

For lifesaving information:

- Visit CPSC.gov.
- Sign up to receive our [e-mail alerts](#).
- Follow us on [Facebook](#), Instagram [@USCPSC](#) and Twitter [@USCPSC](#).
- Report a dangerous product or a product-related injury on www.SaferProducts.gov.
- Call CPSC's Hotline at 800-638-2772 (TTY 301-595-7054).
- Contact a [media specialist](#).

Fast-Track Recall Alert with Health Canada Template



U.S. Consumer Product Safety Commission – Fast-Track Recall Alert with Health Canada and/or Profeco

Release Date: MONTH DAY, YEAR

Release Number: FY-DRAFT

FIRM NAME Recalls GENERIC PRODUCT NAME Due to XXX Hazard(s) (Recall Alert)

Recall Summary

Name of Product:

Hazard:

Remedy: Refund/Repair/Replace

Consumers should immediately stop using the recalled XXX, and contact the firm for a full refund/free repair/free replacement. The firm is contacting all known purchasers directly.

Consumer Contact: FIRM toll-free at XXX-XXX-XXXX from X a.m. to X p.m. ET/CT/PT Monday through Friday, or online at www.XXX.com, and click on XXX at the bottom of the page for more information.

Recall Details

Units: About XXX (in addition, about XXX were sold in Canada and about XXX were sold in Mexico)

Description: This recall involves . . .

Incidents/Injuries:

Sold at: XXX stores nationwide and online at XXXX from MONTH YEAR through MONTH YEAR for about \$XX.

Importer:

Distributor:

Manufacturer:

Manufactured in:

Note: Health Canada's news release is available at:
Profeco's news release is available at:

Photos



This recall was conducted voluntarily by the company under CPSC's Fast-Track Recall process. Fast-Track recalls are initiated by firms who commit to work with CPSC to quickly announce the recall and remedy to protect consumers.

About the U.S. CPSC

The U.S. Consumer Product Safety Commission (CPSC) is charged with protecting the public from unreasonable risks of injury or death associated with the use of thousands of types of consumer products. Deaths, injuries, and property damage from consumer product incidents cost the nation more than \$1 trillion annually. CPSC's work to ensure the safety of consumer products has contributed to a decline in the rate of injuries associated with consumer products for nearly 50 years.

Federal law bars any person from selling products subject to a publicly announced voluntary recall by a manufacturer or a mandatory recall ordered by the Commission.

For lifesaving information:

- Visit CPSC.gov.
- Sign up to receive our [e-mail alerts](#).
- Follow us on [Facebook](#), Instagram [@USCPSC](#) and Twitter [@USCPSC](#).
- Report a dangerous product or a product-related injury on www.SaferProducts.gov.
- Call CPSC's Hotline at 800-638-2772 (TTY 301-595-7054).
- Contact a [media specialist](#).

Appendix D: Best Practices for Communicating Recall Information on Social Media

Use of Organic vs. Paid Ads on Social Media

- Organic ads: posts get shared by users (free).
- Paid ads show up as a result of targeting the demographic that likely purchased the product (user demographic, interests, geographic location). The costs for engaging in social media advertising are typically much less than comparable radio, television, or print advertising.
 - Facebook allows segmentation targeting by gender, relationship status, age location, interests, and more.
 - LinkedIn allows segmentation targeting by industry, company size, function, seniority, location, and language preference.
 - Twitter allows segmenting based on language, gender, follower, device, behavior, tailored audiences, keyword, and geographic location.
 - Snapchat ads – Select from pre-defined audiences, age, location, device type, and advanced demographics like household income and parental status.

Recalling companies should have their staff or a PR agency monitor activity to respond to questions and comments.

See CPSC's "[Social Media Guide for Recalling Companies](#)" for more information.

Other Digital Marketing Opportunities for Recalls

CPSC also encourages the use of common digital marketing techniques to improve dissemination of recall notices. These include paid search engine, display, and online video advertising.

- Search engine advertising and display ads will appear on Web searches before or beside the organic search results. These charges are typically assessed using a "cost-per-click" system.
- Display ads, such as banners, images, and videos, are the advertisements built into websites. Display ads allow:
 - "Retargeting" by reconnecting a recent visitor with your message;
 - Targeting by website placement (selecting the websites on which you place your ads);
 - Targeting by interests, using categories and labeling as in-market or affinity audiences. In-market users make a buying decision, and affinity users are more akin to enthusiasts.
 - Contextual targeting using keywords to identify relevant websites to show your ads.
- Online video advertising captures a different demographic of users
 - Develop video through YouTube or Vimeo, or place video ad at the beginning of others' video(s).
 - Video production essentials:
 - Camera, mobile device, laptop, among other devices
 - Microphones to capture sound
 - Additional lighting, as appropriate, to make visible or highlight the content
 - General video ad development process
 - Make decision on release schedule/date.
 - Draw storyboard showing scenes with content.
 - Decide on, and secure, location and props.
 - Engage with professional video crews, as appropriate, or desired.
 - Shoot and edit videos.
 - Post/release content.

Exhibit T

(FILED UNDER SEAL)

Exhibit U

(FILED UNDER SEAL)

Exhibit V

(FILED UNDER SEAL)

Exhibit W

(FILED UNDER SEAL)

Exhibit X

(FILED UNDER SEAL)

Exhibit Y



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Aegean Apparel Recalls Children's Sleepwear Due to Violation of Federal Flammability Standard



Recalled Aegean Apparel children's pajama pants



**Name of Product:**

Children's robes and pajama pants

Hazard:

The children's sleepwear garments fail to meet the flammability standard for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

May 29, 2019

Units:

About 500

Consumer Contact

Aegean Apparel at 800-864-9403 from 9 a.m. to 6 p.m. ET Monday through Friday email at contactus@aegeanapparel.com or online at www.aegeanapparel.com and click on "Product Safety Recall" for more information.

Recall Details

Description:

This recall involves Aegean Apparel children's robes and pajama pants. The robe is a 100 percent polyester micro fleece. It is hooded with long sleeves, a belt sewn into the back and two front pockets. The robe is light green with a gray and orange cat print with cat ears sewn onto the robe's hood. The pajama pants are 100 percent polyester in white with a black and gray dog wearing a Santa hat print. Both garments were sold in children's sizes small through extra large and have "Kings n Queens by Aegean Apparel" on its label.

Remedy:

Consumers should immediately take the recalled sleepwear away from children and contact Aegean Apparel for a full refund.

Incidents/Injuries:

None reported

Sold At:

Online at www.aegeanapparel.com from November 2016 through October 2018 for \$30 for the pants and about \$60 for the robe.

Importer(s):

Aegean Apparel, Inc. of Dayton, Ohio

Manufactured In:

China

Recall number:

19-128



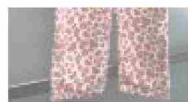
United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Allura Recalls Children's Sleepwear Due to Violation of Federal Flammability Standard



Example of recalled pajamas (other colors and styles included)



**Name of Product:**

Children's pajamas

Hazard:

The children's pajamas fail to meet the flammability standard for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

July 12, 2018

Units:

About 64,000

Consumer Contact

Allura toll-free at 866-254-3103 from 9 a.m. to 5 p.m. ET Monday through Friday, email at custservice1@allurainports.com or online at www.AlluralImports.com and click on "Product Safety Recall" for more information.

Recall Details

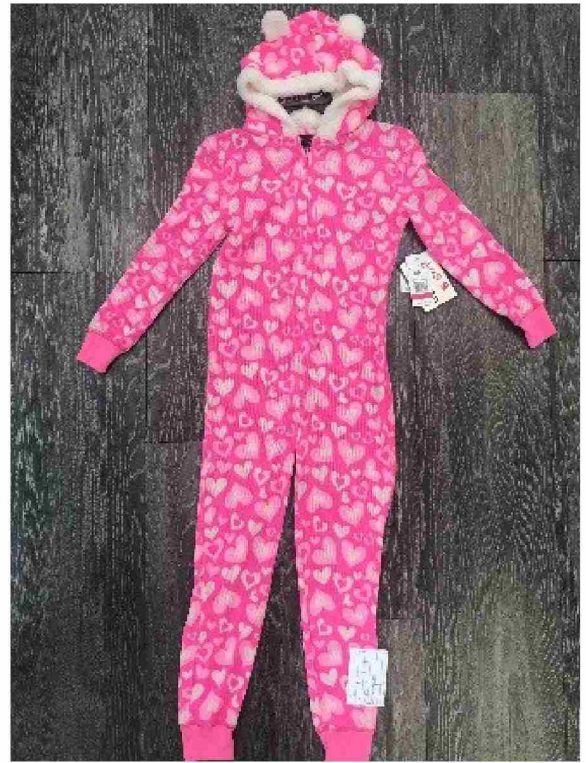
Description:

This recall involves two styles of children's sleepwear garments. The first garment is a 100% polyester fleece pajama pant with the brand name "Sweet N Sassy" on the waist label and hang tag. The style number is located on the back of the brand label at the center waist. The second garment is a 95% polyester and 5% spandex onesie with long-sleeves, a hood and front zipper with the brand name "Delia's Girl" at the neck label and hang tag. The style number is located on the back of the brand label at the neck. The garments were sold in children's sizes 4-6x and 7-16 in a variety of colors and prints.

Style Number	Style Description	Image
S65300 or S67300	4/6X or 7/16 Black/Pink thermal onesie w/sherpa hood love print	



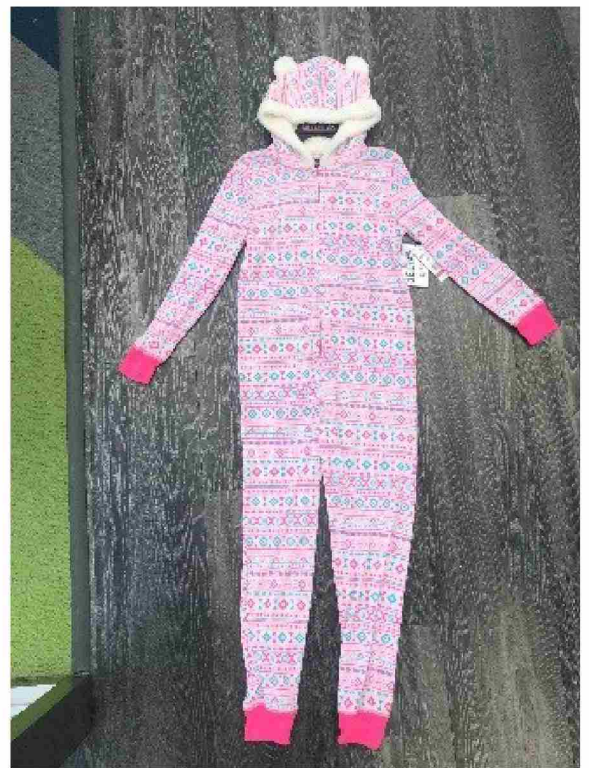
- S65301 4/6X or 7/16 Pink/Tan
- or thermal onesie w/sherpa
- S67301 hood animal print



S65302 4/6X or 7/16 Gray/Cream
or thermal onesie w/Sherpa
S67302 hood dream print



S65303 4/6X or 7/16 Pink/Black
or thermal onesie w/Sherpa
S67303 hood fairisle print



65477 4/6X or 7/16 pink fleece
or pant with feather print
67477



65477
or
67477 4/6X or 7/16 mint fleece
 pant with feather print



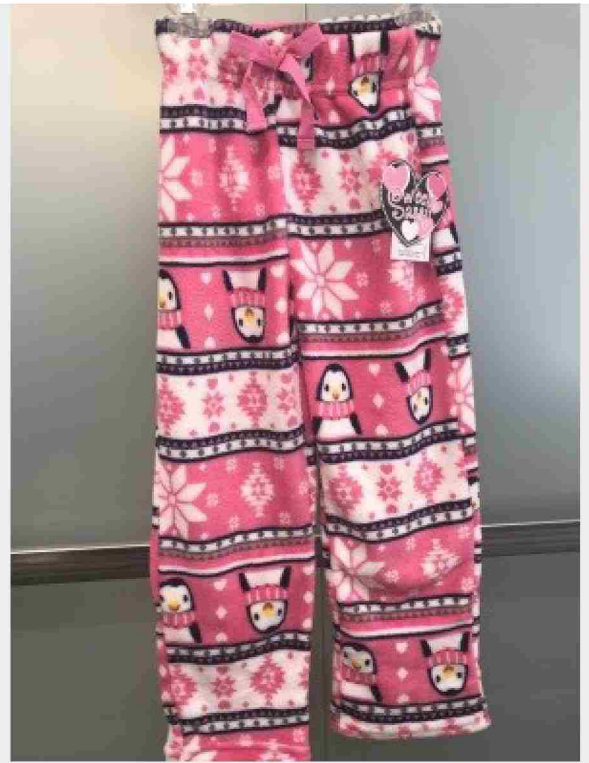
65477 4/6X or 7/16 gray/pink
or fleece pant with animal
67477 print



65477 4/6X or 7/16 brown/tan
or fleece pant with animal
67477 print



65477 4/6X or 7/16 pink fleece
or pant with penguin print
67477



65477
or
67477 4/6X or 7/16 coral fleece
 pant with penguin print



65476 4/6X or 7/16 pink/gray
or fleece pant with plaid print
67476



65476
or
67476 4/6X or 7/16 gray/turk
fleece pant with plaid print



65476 4/6X or 7/16 white fleece
or pant with verbiage print
67476



65476 4/6X or 7/16 charcoal
 or fleece pant with verbiage
 67476 print

65476 4/6X or 7/16 pink fleece
 or pant with star print
 67476



65476
or
67476

4/6X or 7/16 white fleece
pant with star print



65475
or
67475

4/6X or 7/16 white/black
fleece pant with Aztec
print



65475 4/6X or 7/16 pink/gray
or fleece pant with Aztec
67475 print

65475 4/6X or 7/16 turk fleece
or pant with fox print
67475



65475
or
67475 4/6X or 7/16 navy fleece
 pant with fox print

65475 4/6X or 7/16 pink fleece
or pant with heart print
67475



65475
or
67475

4/6X or 7/16 gray fleece
pant with heart print

Remedy:

Consumers should immediately stop using the recalled sleepwear, take it away from children and contact Allura for a full refund.

Incidents/Injuries:

None reported

Sold At:

America's Kids, Boscov's, Kids For Less and other stores nationwide and online at Amazon.com, CookiesKids.com, CrazyforBargains.com, Sophiasstyle.com and other websites from September 2017 to April 2018 for between \$8 and \$13.

Manufacturer(s):

Allura

Importer(s):

Allura Imports, of New York

Distributor(s):

Allura Imports, of New York

Manufactured In:

China

Recall number:

18-188



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

ASHERANGEL Recalls Children's Sleepwear Due to Violation of Federal Flammability Standard; Sold Exclusively at Amazon.com (Recall Alert)



ASHERGAL children's nightgown in purple

**Name of Product:**

Children's nightgowns and pajama sets

Hazard:

The children's nightgowns and pajama sets fail to meet flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

September 05, 2017

Units:

About 950

Consumer Contact

ASHERANGEL by email at polook2013@gmail.com.

Recall Details

Description:

This recall involves children's 100 percent cotton nightgowns and two-piece pajama sets. The short-sleeve nightgowns have white lace at the neckline and a ribbon bow. The nightgowns were sold in purple, pink and blue. The two-piece, long-sleeve shirt and pant pajama sets have a four button placket down the center front of the top and a pocket on the left chest. They were sold in solid pink, black with white polka dots, a pink gingham pattern and a blue gingham pattern. Both garments were sold in European sizes 110 cm (4-6 years), 120 cm (6-8 years), 130 cm (7-10 years), 140 cm (9-11 years) and 150 cm (11-13 years). The European size in inches is printed on a tag on the inside of the garment at the back of the neck.

Remedy:

Consumers should immediately stop using the recalled sleepwear, take them away from children and contact ASHERANGEL for a full refund. The firm is contacting all known purchasers directly.

Incidents/Injuries:

None reported

Sold Exclusively At:

Amazon.com from December 2016 through July 2017 for between \$16 and \$21.

Importer(s):

ASHERANGEL, of China

Distributor(s):

ASHERANGEL, of China

Manufactured In:

China

Recall number:

17-765



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Bunz Kidz Children's Sleepwear Sets Recalled by Stargate Apparel Due to Violation of Federal Flammability Standard; Burn Hazard



Recalled Bunz Kidz children's sleepwear set



**Name of Product:**

Bunz Kidz Children's Sleepwear Sets

Hazard:

The children's sleepwear sets fail to meet the federal flammability standard for children's sleepwear which requires sleepwear to be either snug-fitting or flame resistant, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

May 20, 2020

Units:

About 6,600

Consumer Contact

Stargate Apparel toll-free at 866-351-0193 from 10 a.m. to 3 p.m. ET Monday through Friday, email at recall@stargateap.com with "Product Recall" as the email subject or online at www.stargateapparel.com and click the Contact link on the upper right hand corner of the homepage for more information.

Recall Details

Description:

This recall involves Bunz Kidz-branded children's sleepwear sets consisting of a robe, top and pants. The sleepwear sets were sold in sizes 2 through 12. The 100% micro polyester fleece robe and pants are white with allover pink star print and the 100% polyester top is pink with Dream in Glitter printed onto the chest in gold. The robe has long-sleeves, a shawl collar, two side seam pockets and a sewn-on tie located at the waist and the pants have an elastic waistband. Bunz Kidz is printed on a blue sewn-in label and style numbers L23846, L43846 or L73846 and GPU numbers 2017-246, 2017-446 or GPU 2017-746 are printed on another sewn-in label.

Remedy:

Consumers should immediately take the recalled sleepwear sets away from children and contact Stargate Apparel for a full refund.

Incidents/Injuries:

None reported

Sold At:

Boscovs, Century 21, JC Penney, Macy's, Marshalls and TJ Maxx other stores nationwide and online at Amazon.com and Walmart.com from August 2017 through December 2019 for between \$24 and \$48.

Distributor(s):

Stargate Apparel, of New York

Manufactured In:

China

Recall number:

20-125



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Childrens Pajamas Recalled by KJ Sportswear California



Note: Toll-free number has changed.



K.J. Sportswear California Thor One Piece and Two-Piece Pajamas



Name of Product:

Children's Pajamas

Hazard:

The pajamas fail to meet federal flammability standards for children's sleepwear, posing a risk of burn injury to children.

Remedy:

Refund

Recall Date:

March 10, 2015

Units:

About 9,200

Consumer Contact

K.J. Sportswear California toll-free at (714)-966-6988 from 9 a.m. to 5 p.m. PT Monday through Friday or email pjrecall@kjsportswear.net for more information.

Recall Details

Description:

This recall involves children's one-piece and two-piece Thor pajama sets. The children's one-piece 94% polyester and 6% spandex with "Thor" printed on the center front in three different color patterns: blue and white, red and white, and pink and black. The children's two-piece, long-sleeve and pant pajama set is 94% polyester and 6% spandex with "Thor" printed on the center front in three different color patterns: blue and white, red and white, and pink and black. The pajamas were sold in sizes 6 to 12 months, 12 to 18 months and 18 to 24 months through youth large. This recall includes both pajama styles with these tracking numbers on the back of the neck label: 728141, 995755, 995756, 995757 and 995758.

Remedy:

Consumers should immediately take the recalled pajamas away from children, stop using them and return them to K.J. Sportswear California for a full refund.

Incidents/Injuries:

None reported

Sold At:

Authorized Thor motocross retailers nationwide from June 2013 through December 2014 for between \$30 and \$45.

Manufactured In:

China

Recall number:

15-093



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Nightgowns Recalled by AllMeInGeld Due to Violation of Federal Flammability Standards and Burn Hazard; Sold Exclusively on Amazon.com



Recalled AllMeInGeld Children's Nightgown in Pink Stripes

**Name of Product:**

Children's Nightgowns

Hazard:

The children's nightgowns fail to meet federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

February 09, 2022

Units:

About 3,900

Consumer Contact

AllMeInGeld email at yong-yi.US@outlook.com.

Recall Details

Description:

This recall involves AllMeInGeld children's nightgowns. The nightgowns were available in three styles: long-sleeved, short-sleeved and long-sleeved with a matching doll nightgown. The nightgowns are made of 100% cotton and were sold in children's sizes 3T through 9. The nightgowns were manufactured in pink stripes with three ribbons at the neck; pink with flower print and pink with unicorn print; pink with lace décor; green, red and yellow striped nightgowns with a cherry embroidered on the left chest and blue and pink with a cherries print. The sewn-in label has Chinese lettering.

Remedy:

Consumers should immediately take the recalled nightgowns away from children and stop using them. Consumers who purchased the garments from Amazon.com will be contacted through Amazon's messaging platform and provided prepaid mailers to return the products for a full refund. Consumers can also contact AllMeInGeld to request a postage prepaid mailer to return the products for a full refund.

Incidents/Injuries:

None reported

Sold Exclusively At:

Online at Amazon.com from October 2017 through June 2021 for about \$16.

Importer(s):

AllMeInGeld, of Guangdong Shenzhen, China

Manufactured In:

China

Recall number:

22-071



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Nightgowns Recalled by AOSKERA Due to Violation of Federal Flammability Standards and Burn Hazard



Recalled Children's Nightgown (White Allover Strawberry Print)



**Name of Product:**

Children's Nightgowns

Hazard:

The recalled nightgowns fail to meet flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

January 26, 2022

Units:

About 1,000

Consumer Contact

AOSKERA by email at yaofa_us@outlook.com.

Recall Details

Description:

This recall involves children's nightgowns. The long-sleeved nightgowns are made of 100% cotton and were sold in children's sizes 3-4T, 5-6, 6-7, 7-8, 9-10, 11-12 and 13-14. The nightgowns were manufactured in three different strawberry themed prints: White Allover Strawberry Print, Pink Allover Strawberry Print and Pink Strawberry Print. The nightgowns had an affixed hangtag that stated "MAM DAD KIDS Made In China."

Remedy:

Consumers should immediately take the recalled nightgowns away from children and stop using them. Consumers who purchased the garments from Amazon.com will be contacted through Amazon's messaging platform and provided prepaid mailers to return the products for a full refund. Consumers can also contact AOSKERA to request a postage prepaid mailer to return the products for a full refund.

Incidents/Injuries:

None reported

Sold At:

Online at Amazon.com from October 2020 through May 2021 for between \$16 and \$25.

Importer(s):

AOSKERA, of China

Manufactured In:

China

Recall number:

22-057



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Nightgowns Recalled by Saro Trading Due to Violation of Federal Flammability Standard



Nightgown label





Name of Product:

Children's nightgowns

Hazard:

The **children's nightgowns** fail to meet federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

June 29, 2016

Units:

About 7,800

Consumer Contact

Saro Trading Company at 800-662-7276 from 7 a.m. to 3:30 p.m. Monday through Friday PT, email at info@saro.com or online at www.sarostore.com and click on the Product Recall link at the bottom of the page for more information.

Recall Details

Remedy:

Consumers should immediately take the recalled nightgowns away from children and contact the firm for instructions on receiving a full refund.

Incidents/Injuries:

None reported

Sold At:

Francie Hargrove Interior Designs, Georges Girls Luxe Sleep and Nichols stores nationwide, and online at <http://www.sarostore.com/> and <http://fennco.com/en/> from February 2012 through April 2016 for \$25.

Importer(s):

Saro Trading Company of Burbank, Calif.

Manufactured In:

China

Recall number:

16-205



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Pajamas and Robes Recalled by Lazy One



Recalled Lazy One footed pajamas



**Name of Product:**

Children's pajamas and robes

Hazard:

The footed pajamas and robes fail to meet the federal flammability standard for children's sleepwear, posing a burn hazard to children.

Remedy:

Replace

Recall Date:

February 04, 2015

Units:

About 8,400

Consumer Contact

Lazy One toll-free at (866) 340-5278 between 9 a.m. and 5 p.m. MT Monday through Friday, or online at www.lazyone.com and click on the Product Recall link on the bottom of the page for more information.

Recall Details

Description:

This recall involves 100% polyester Lazy One children's sleepwear garments, including footed pajamas and two robes. The one-piece "footeez" style footed zip-up pajama is beige with a red, pink, blue and yellow owl print with the wording "I'm OWL yours." It has blue trim at the neck, cuff and right-hand side single pocket. The pajama has a foot-to-neck zipper, non-slip soles and a rear opening on the behind. It was sold in sizes children's small through extra-large. One of the recalled robes is pink with moose graphics and "Don't Moose With Me" printed on it. It has solid green trim, two front pockets and belt. The second robe is red with printed moose graphics and solid black trim, two front pockets and belt. Both robes were sold in sizes 4T through 14. "Lazy One", the size and "Made in China" are printed on the garments' neck label. Garments with "Flame Resistant" printed on the neck label are not included in this recall.

Remedy:

Consumers should immediately take the recalled pajamas and robes away from children and return them to Lazy One for a free replacement garment, including shipping.

Incidents/Injuries:

None reported.

Sold At:

Department stores and children's boutiques nationwide and online at www.lazyone.com from October 2013 through June 2014 for about \$22 for the pajamas and about \$15 for the robes.

Manufactured In:

China

Recall number:

15-072



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Pajamas Recalled by Star Ride Kids



Star Ride Kids girl's pajama sets



Name of Product:

Children's Pajama Sets

Hazard:

The pajamas fail to meet federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

January 08, 2015

Units:

About 7,000

Consumer Contact

Star Ride Kids toll-free at (866) 349-7094 from 9 a.m. to 5 p.m. ET Monday through Friday or online at www.starride.com and click on the Product Recall link on the bottom of the page for more information.

Recall Details

Description:

This recall involves Star Ride Kids girl's pajama sets. The recalled pajamas are made of polyester and sold in sizes 4 through 14. The pajama sets consist of polar fleece pants with a bow and elastic at the waist and a jersey two-piece long-sleeve shirt. Style reference number 5217 or 5250 is on a label in the side seam of each shirt. "Star Ride Taking It To The Next Level" is on a label in the waistband of each pair of pants. The logo "Star Ride" is printed on the inside back of the neck of each shirt. Some shirts have a hangtag on the wrist with the words "flame resistant sleepwear." The sets were sold in the following combinations:

Style Reference No. 5217

- Black and white zebra printed pants paired with a blue top with a zebra printed heart on the center front.
- Pink and black zebra printed pants paired with a white top with pink, heart-shaped peace signs and the word "Peace" printed on the center front.

Style Reference No. 5250

- Blue pants with the words "Happy, Love, Dreams" in a multicolored print paired with a white and blue top with the word "Hope" printed on the center front.

- Pink pants with the words "Happy, Love, Dreams" in a multicolored print paired with a white and pink top with multicolored stars on the lower left side.

Remedy:

Consumers should immediately take the recalled pajamas away from children, stop using them and return them to the place of purchase for a full refund.

Incidents/Injuries:

None reported

Sold At:

Children's boutiques and department stores nationwide from August 2013 through November 2013 for between \$10 and \$13.

Manufactured In:

China

Recall number:

15-057



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Nightgowns Recalled Due to Violation of Federal Flammability Standards and Burn Hazard; Imported by iMOONZZZ; Sold Exclusively at Amazon.com



Recalled iMOONZZZ white flutter sleeved nightgown

**Name of Product:**

Children's Nightgowns

Hazard:

The children's nightgowns fail to meet the flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

June 30, 2022

Units:

About 2,000

Consumer Contact

iMOONZZZ via email at product-recall@imoonzzzchildrensnightgowns.com or online at www.imoonzzzchildrensnightgowns.com/product-recall-information/ for more information.

Recall Details

Description:

This recall involves two styles of iMOONZZZ-branded 95% cotton and 5% spandex children's nightgowns, sold individually or as a set of three. The flower print nightgowns were sold in blue, pink and white and in sizes 3-4T, 5-6 Years, 6-7 Years, 7-8 Years, 8-9 Years, and 10-12 Years. One style has fluttered sleeved shoulders and a color trim neckline with a ribbon at the center front. The other style has short, puffed sleeves with lettuce edge trimming and a double laced collar with a bow affixed to the left side. "Made in China," the size, the fiber content and the washing instructions are printed on a sewn-in, side-seam label.

Remedy:

Consumers should immediately take the recalled nightgowns away from children and contact iMOONZZZ for a full refund. Consumers who purchased the nightgowns will be asked to destroy the garments by cutting them in half and send the recalling firm a photo of the destroyed garment. Upon receipt of the photo, consumers will be issued a full refund of the purchase price.

Incidents/Injuries:

None reported

Sold At:

Online at www.amazon.com from June 2019 through May 2022 for between \$13 and \$39, depending on the style and if sold individually or as a set.

Importer(s):

iMOONZZZ, of China

Manufactured In:

China

Recall number:

22-178



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Nightgowns Sold Exclusively on Amazon.com Recalled Due to Violation of Federal Flammability Standard and Burn Hazard; Manufactured by Auranso Official



Recalled Auranso Official children's nightgown – short sleeves, pink with white heart
print

**Name of Product:**

Children's Nightgowns

Hazard:

The nightgowns fail to meet the federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

June 30, 2021

Units:

About 8,000

Consumer Contact

Auranso Official toll-free at 833-253-6448, email at Auranso_us@outlook.com or online at www.auransoly.com and click on "Product Recall Notice" at the bottom of the page for more information on how to receive a refund.

Recall Details

Description:

This recall involves seven styles of Auranso Official children's nightgowns. The short or long-sleeved nightgowns were sold in sizes 2-3T, 3-4T, 5-6X, 6-7 Years, 7-8 Years and 9-10 Years. They have pink heart, white heart or striped strawberry prints on them and were sold in white and pink. The heart print nightgowns are made of 95% cotton and 5% spandex, and the striped strawberry print nightgowns are made of 100% cotton. The size, fabric, and "Made in China" are printed on a sewn-in label.

Remedy:

Consumers should immediately stop using the recalled garments and contact Auranso Official for instructions on returning the garments with free shipping to receive a full refund.

Incidents/Injuries:

None reported

Sold Exclusively At:

Online at www.Amazon.com from January 2021 through June 2021 for between \$11 and \$19.

Manufacturer(s):

Auranso Official, of Zhejiang, China

Manufactured In:

China

Recall number:

21-156



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Nightgowns Sold Exclusively on Amazon.com Recalled Due to Violation of Federal Flammability Standard and Burn Hazard; Manufactured by Booph



Recalled Booph children's nightgown – short sleeves, pink with strawberries

**Name of Product:**

Children's Nightgowns

Hazard:

The nightgowns fail to meet the federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

June 30, 2021

Units:

About 4,900

Consumer Contact

Booph toll-free at 833-866-6743, email caobooph_us@outlook.com or online at www.chjbooph.com and click on "Recall Notice" at the bottom of the page for more information on how to receive a refund.

Recall Details

Description:

This recall involves 10 styles of Booph's 100% cotton children's nightgowns. They were sold in sizes 2-3T, 3-4T, 5 Years, 6-7 Years, 7-8 Years, and 9-10 Years. The short or long-sleeved nightgowns have fruit prints and were sold in white, blue, purple and two shades of pink colors. The size, "100% Cotton, and "Made in China" are sewn on the inner label of the garment's hem line.

Remedy:

Consumers should immediately stop using the recalled garments and contact Booph for instructions on returning the garments with free shipping to receive a full refund.

Incidents/Injuries:

None reported

Sold Exclusively At:

Online at www.Amazon.com from March 2021 through June 2021 for between \$9 and \$16.

Manufacturer(s):

Booph, of Shenzhen, China

Manufactured In:

China

Recall number:

21-157



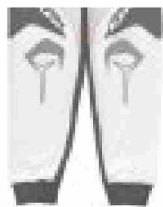
United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Pajamas Recalled by KTM North America



Black/Orange Top



**Name of Product:**

Children's Pajamas

Hazard:

The pajamas fail to meet federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

March 04, 2015

Units:

About 2,800

Consumer Contact

KTM North America, Inc. toll-free at (888) 985-6090 from 9 a.m. to 5 p.m. ET, Monday through Friday or online at www.ktmusa.com and click on "Recall Information" link at the bottom of the page for more information.

Recall Details

Description:

This recall involves children's onesies and two-piece KTM motocross pajamas. The Baby Racing Body onesies are 95% cotton and 5% elastane and were sold in three prints. One is orange with white sleeves and the KTM brand logo on the left chest. The second is white and orange with the KTM brand logo in bold orange printed on the center front of the chest and on the left and right hip. The third onesie is yellow with orange and black detailing and the KTM brand logo printed on the left. All onesies are long-sleeved and have snap closures from the neck to the left ankle and were sold in sizes 18 months to 2T.

The two-piece, long-sleeve and pant pajama sets are 100% cotton and were sold in two prints. The Kids Racing Gear pajama is white with black, orange and grey detailing on the top and pant with a black elastic waistband and KTM printed on the left side of the chest. This set was sold in sizes 2T through 5T. The Kids Gravity Gear pajama two-piece set is white with blue, and orange detailing on the top and pant with an elastic waistband in orange and KTM printed on the left side of the chest and on the right hand wrist. This set was sold in sizes XXS through L.

Remedy:

Consumers should immediately take the recalled pajamas away from children, stop using them and return them to KTM North America, Inc. for a full refund.

Incidents/Injuries:

None reported

Sold At:

Authorized KTM motorcycle shops nationwide from August 2012 through January 2015 for between \$28 and \$32.

Manufactured In:

China

Recall number:

15-089



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Pajamas Recalled by Smooth Industries



“Ride Smooth” themed children’s pajamas



**Name of Product:**

Children's Pajamas

Hazard:

The pajamas fail to meet federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Replace

Recall Date:

April 08, 2015

Units:

About 7,600

Consumer Contact

Smooth Industries toll-free at (844) 216-2076 from 9 a.m. to 5 p.m. PT Tuesday through Friday, or online at www.smoothindustries.com and click on the Product Recall link on the homepage.

Recall Details

Description:

This recall involves children's one- and two-piece Smooth Industries pajama sets. The pajamas are made of 100% polyester and were sold in four styles: Ride Smooth, Honda, MX Superstars and Moto X. The racing-themed pajamas have large motocross-related graphics and were sold in red, white and black; orange, white and black; and red, blue and black. One-piece pajama sets were sold in sizes: 6 to 12 months, 12 to 18 months and 18 to 24 months. Two-piece sets were sold in sizes XS to Youth XL. "Smooth Ind." and "smoothindustries.com" is printed on the garment's neck label.

Remedy:

Consumers should immediately take the recalled pajamas away from children, stop using them and return them to Smooth Industries for credit towards another Smooth Industries product.

Incidents/Injuries:

None reported.

Sold At:

Authorized Smooth Industries motorcycle and motocross stores nationwide and online at SmoothIndustries.com and other motocross websites from October 2012 through January 2015 for between \$30 and \$35.

Importer(s):

Smooth Industries, Oceanside, Calif.

Manufactured In:

China

Recall number:

15-108



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Pajamas Recalled Due to Violation of Federal Flammability Standard and Burn Hazard; Manufactured by Tkala Fashion; Sold Exclusively on Amazon.com



Recalled Tkala Fashion children's pajamas – short sleeves, multi-color dinosaur print

**Name of Product:**

Children's Pajamas

Hazard:

The pajamas fail to meet the federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

July 28, 2021

Units:

About 6,000

Consumer Contact

Tkala Fashion email tkalafashion@163.com or online at www.tkalafashion.com and click on "Recall Notice" at the top of the page for more information on how to receive a refund.

Recall Details

Description:

This recall involves six styles of Tkala Fashion 100% cotton children's pajamas. They were sold in sizes 1-8 Years, 10 Years and 12 Years, and in the following prints: Multi-color dinosaur, orange and white dinosaur, gray shark, green dinosaur, black and white dinosaur, and black rocket ship. The two-piece pajamas have short sleeves. "100% cotton" and the care instructions are printed on the inside of the top.

Remedy:

Consumers should immediately take the recalled pajamas away from children and stop using them. Amazon and/or Tkala Fashion will contact all known purchasers with information on how to receive a refund. If you do not receive communication from either Amazon or Tkala Fashion, contact Tkala Fashion.

Incidents/Injuries:

None reported

Sold Exclusively At:

Online at www.Amazon.com from January 2021 through June 2021 for between \$7 and \$15.

Manufacturer(s):

Tkala Fashion, of Shenzen, China

Manufactured In:

China

Recall number:

21-171



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Robes Recalled by HulovoX Due to Violation of Federal Flammability Standards and Burn Hazard



Recalled Children's Robe: White Heart Tie-Dye



**Name of Product:**

Children's Robes

Hazard:

The recalled robes fail to meet flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

January 12, 2022

Units:

About 3,500

Consumer Contact

HulovoX at 800-316-0241 from 9 a.m. to 5 p.m. PT Monday through Friday, email at hulovox-recall@outlook.com or online at:

www.hulovox.com/page/html/contact.php or www.hulovox.com and click on "RECALL NOTICE" at the top of the page for more information.

Recall Details

Description:

This recall involves children's robes. The long-sleeved robes are made of 100% micro polyester and were available in sizes 3T through 12. The robes were sold in twenty-two multicolored tie-dye and rainbow colorways. The robes have a sewn-in side seam belt, internal button closure and some have a hood with unicorn décor features such as a mane, ears and horn. The sewn-in neck label states the fiber content, washing instructions and "Made in China." The sewn-in side seam label states the garment's size.

Remedy:

Consumers should immediately take the recalled robes away from children and stop using them. Consumers who purchased the garments from Amazon.com will be contacted through Amazon's messaging platform and provided prepaid mailers to return the products for a refund. Consumers can also contact HulovoX to request a postage prepaid mailer to return the products for a full refund.

Incidents/Injuries:

None reported

Sold At:

Online at Amazon.com from January 2021 through May 2021 for about \$30.

Retailer:

HulovoX, of Zhejiang in China

Manufactured In:

China

Recall number:

22-053



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Robes Recalled Due to Burn Hazard; Imported by NewCosplay



Recalled NewCosplay children's robes



**Name of Product:**

Children's robes

Hazard:

The children's robes fail to meet flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

May 05, 2022

Units:

About 3,160

Consumer Contact

NewCosplay by email at 591025473@qq.com or online at www.newcosplay.net/pages/product-recalls or www.newcosplay.net and click on "PRODUCT RECALLS" at the top of the page for more information.

Recall Details

Description:

This recall involves NewCosplay children's robes. The long-sleeved robes are made of 100% micro polyester and were sold in sizes 3T through 12. The robes were sold in 22 different patterns. The robes have a sewn-in side seam belt, two functional front pockets and a hood that is character theme with a mane, ears and horn. The sewn-in neck label displays the fiber content, washing instructions and "Made in China." The sewn-in side seam label displays the garment's size.

Remedy:

Consumers should immediately take the recalled robes away from children, stop using them, destroy them, and contact NewCosplay for a full refund. Consumers who purchased the robes from Amazon.com will be contacted by Amazon and NewCosplay directly.

Incidents/Injuries:

None reported

Sold At:

Online at www.newcosplay.net and www.amazon.com from December 2021 through March 2022 for between \$14 and \$30, depending on the style.

Importer(s):

NewCosplay, of China

Manufactured In:

China

Recall number:

22-129

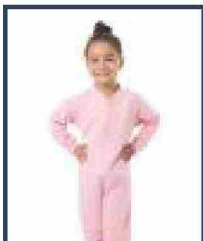


United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Creating X Recalls Children's Pajamas



Pink Children's Footed Pajamas



**Name of Product:**

Children's footed pajamas

Hazard:

The pajamas fail to meet the federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Replace

Recall Date:

March 31, 2016

Units:

About 5,400

Consumer Contact

Creating X toll-free at 888-695-2664 from 7 a.m. to 5 p.m. PT Monday through Friday, email at recall@creatingx.com or online at www.FootedPajamas.com and click on the Product Recall link at the top of the page for more information.

Recall Details

Description:

This recall involves two styles of children's footed pajamas. The first style is a child's 100% cotton one-piece, long-sleeved footed pajama with a zip-up closure starting from above the left ankle. The second style is a child's 100% cotton one-piece, long-sleeved footed pajama with a hood, two front pockets and a zip-up closure starting from the left ankle. The pajamas were sold in a variety of colors and patterns including solids, stripes, plaids, hearts, white snowflakes, yellow moon and white and blue stars, white bunnies and colored Easter eggs. The pajamas were sold in sizes infant large through kids large.

Remedy:

Consumers should immediately take the recalled pajamas away from children, stop using them and contact Creating X for instructions on receiving a store credit towards another Creating X product. Creating X is contacting all purchasers of the recalled pajamas directly.

Incidents/Injuries:

None reported

Sold At:

Online at www.Amazon.com, www.footedpajamas.com, www.sears.com and www.Zulily.com for \$20 for infant sizes, \$25 for toddler sizes and \$30 for kids sizes.

Importer(s):

Creating X LLC, of Carson City, Nev.

Manufactured In:

China

Recall number:

16-734



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Robes Recalled Due to Violation of Federal Flammability Standards and Burn Hazard; Imported by BAOPTEIL; Sold Exclusively on Amazon.com



Recalled BAOPTTEIL children's robe – Solid pink

**Name of Product:**

Children's Robes

Hazard:

The children's robes fail to meet the federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

February 02, 2022

Units:

About 3,800

Consumer Contact

BAOPTTEIL via email at 244882378@qq.com.

Recall Details

Description:

This recall involves BAOPTTEIL-branded children's 100% micro polyester (fleece) robes. They were sold in various colors, patterns, and in sizes 2T through 14 Years. The long-sleeved, hooded robes have two front pockets and a sewn-in, side-seam matching belt. "Made in China," the size, the fiber content and the washing instructions are printed on a sewn-in, side-seam label.

Remedy:

Consumers should immediately take the recalled robes away from children and stop using them. Consumers who purchased the robes from Amazon will be contacted through Amazon's messaging platform and provided prepaid mailers to return the robes for a full refund. Consumers can also contact BAOPTTEIL to request a postage prepaid mailer to return the robes for a full refund.

Incidents/Injuries:

None reported

Sold Exclusively At:

Online at www.Amazon.com from December 2019 through August 2021 from between \$6 and \$19.

Importer(s):

BAOPTTEIL, of China

Distributor(s):

Amazon, of Seattle, Wash.

Manufactured In:

China

Recall number:

22-066



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Robes Sold Exclusively on Amazon.com Recalled Due to Violation of Federal Flammability Standard and Burn Hazard; Manufactured by SIORO

Recalled SIORO children's robe - white



Recalled SIORO children's robe – white



Recalled SIORO children's robe - taupe



Recalled SIORO children's robe - light blue

**Name of Product:**

Children's Robes

Hazard:

The children's robes fail to meet the federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

June 30, 2021

Units:

About 950

Consumer Contact

SIORO email at cs@sioro.com or online at www.SIORO.com and click on "Recall Notice" at the bottom of the page for more information on how to receive a refund.

Recall Details

Description:

This recall involves SIORO-branded children's 100% cotton robes. They were sold in sizes S, M, and L in the following eight colors: brown, dark gray, green, light blue, teal, navy, plum and white. The long-sleeved, hooded robes have two front pockets and two side seam belt loops with a matching belt. "Made in China" and "100% Cotton" are printed on a sewn-in label.

Remedy:

Consumers should immediately stop using the recalled garments and contact SIORO for instructions on returning the garments with free shipping to receive a full refund.

Incidents/Injuries:

None reported.

Sold Exclusively At:

Online at www.Amazon.com from December 2020 through April 2021 for between \$24 and \$29.

Manufacturer(s):

SIORO, of Wuhan, China

Manufactured In:

China

Recall number:

21-159



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Sleep Sacks Recalled by Gildan Activewear Due to Violation of Federal Flammability Standard; Sold Exclusively at AmericanApparel.com (Recall Alert)



Recalled American Apparel-branded children's sleep sack.



**Name of Product:**

Children's sleep sacks

Hazard:

The children's sleep sacks fail to meet the flammability standard for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Replace

Recall Date:

May 28, 2019

Units:

About 10,600

Consumer Contact

American Apparel toll-free at 833-222-7760 from 7 a.m. to 5 p.m. PT Monday through Friday, email at service@americanapparel.com with Product Recall as the email subject, or online at www.americanapparel.com and click on the Product Recall link located at the bottom of the page for more information.

Recall Details

Description:

This recall involves a American Apparel brand Baby Rib Collection children's 100% cotton and 90% cotton and 10% polyester-blended knit sleep sacks. They were sold in size 6-12 months and in the following colors: Black, green, gray, light blue, navy, pink, red and white. American Apparel and Baby Rib Collection are printed on a neck label. Made in Honduras and the size are printed on another neck label.

Remedy:

Consumers should immediately take the recalled sleep sacks away from children, stop using them and contact American Apparel for a full refund or a replacement product of similar value. Gildan Activewear is contacting all known purchasers directly.

Incidents/Injuries:

None reported

Sold At:

Online at www.americanapparel.com from January 2018 through January 2019 for between \$15 and \$20.

Importer(s):

Gildan Activewear SRI of Barbados

Manufactured In:

Honduras

Recall number:

19-747



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Sleepwear Garments Recalled by Childreusalon Due to Violation of Federal Flammability Standards and Burn Hazard



Fabric Flavours



**Name of Product:**

Children's Sleepwear Garments

Hazard:

The recalled children's sleepwear garments fail to meet the United States flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

January 19, 2022

Units:

About 180

Consumer Contact

Childrensalon Ltd. toll-free at 833 611-2580 from 9 a.m. to 5 p.m. ET Monday through Friday, or online at <https://www.childrensalon.com/recall-information/> or www.childrensalon.com and click on Recall Safety at the bottom of the webpage for additional information.

Recall Details

Description:

This recall involves five different children's sleepwear garments including Fabric Flavours, Mini Lunn, My Little Pie, Joha and Beau Kid.


Image	Brand	Description	Size Range
	Fabric Flavours	Children's 60% cotton and 40% polyester, two-piece, short-sleeve top and short pajama set. The pajama set has a "Matilda Roald Dahl" print.	3-4 Years 5-6 Years 6-7 Years 7-8 Years


Image	Brand	Description	Size Range
	<p>Mini Lunn</p>	<p>Children's 100% cotton, two-piece, long-sleeve top and pant pajama set. The pajama set is in a white and blue checkered print with racing car embroidery on the front. The top has button fastening and the pants have an elasticated waist band with a drawstring.</p>	<p>6-12 Months 1-2 Years 2-3 Years 4-5 Years 6-7 Years 8-9 Years</p>

Image	Brand	Description	Size Range
	<p>My Little Pie</p>	<p>Children's 100% cotton, two-piece, long-sleeved top and pant pajama set. The pajama set is in an allover monster print.</p>	<p>12-18 Months 18-24 Months 2-3 Years 3-4 Years 4-5 Years 5-6 Years</p>



Image	Brand	Description	Size Range
	Joha	<p>Children's 96% viscose and 4% lycra, two-piece, long-sleeved top and pant pajamas set. The pajama set has a three-button fastening on the top's chest.</p>	<p>1-2 Years</p> <p>3-4 Years</p> <p>4-5 Years</p> <p>6-7 Years</p> <p>8-9 Years</p> <p>9-10 Years</p> <p>11-12 Years</p>

Image	Brand	Description	Size Range
	Beau Kid	Children's 95% cotton and 5% elastane jersey and 100% polyester fine mesh overlay, two-piece, long-sleeved top and pant pajama set. The pajama set has a broderie anglaise insert with a pink satin bow on the top and has a matching frilled trim on the cuffs and anklets.	2-3 Years 3-4 Years 4-5 Years 5-6 Years 6-7 Years 7-8 Years 8-9 Years

Remedy:

Consumers should immediately stop using the recalled children's sleepwear garments and take them away from children. Consumers should contact Childrensalon for

instruction on returning the recalled sleepwear. Childreusalon will contact all known purchasers and provide prepaid return mailers. Upon returning the garment, Childreusalon, will refund consumers the purchase price.

Incidents/Injuries:

None reported

Sold At:

Online at www.childreusalon.com from April 2019 through February 2021 for between \$35 and \$54.

Manufactured In:

The Fabric Flavours (India), Mini Lunn (China), My Little Pie (EU), Joha (Europe), and Beau Kid (China).

Recall number:

22-055



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Sleepwear Recalled Due to Violation of Federal Flammability Standard and Burn Hazard; Sold Exclusively by Zoetop Business Co. Ltd. at www.SHEIN.com (Recall Alert)



Recalled Children's Sleepwear Set: SKU Sknight10190731477



Name of Product:

Children's Sleepwear Sets

Hazard:

The recalled sleepwear sets fail to meet flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

July 29, 2021

Units:

About 2,320

Consumer Contact

SHEIN toll-free at 877-245-8975 from 9 a.m. to 6 p.m. PT Monday through Friday, or email at recall@shein.com or online at www.shein.com and click on "Recall Notice" at the bottom of the page.

Recall Details

Description:

This recall involves two styles of SHEIN branded children's sleepwear sets. The sleepwear sets are made of 97 percent polyester and 3 percent spandex. The sleepwear sets were sold in sizes "120, 130, 140, 150 and 160". The first sleepwear set is a children's two-piece, short-sleeved top and pant set in an all-over multicolor plaid print. The second sleepwear set is a children's two-piece, long-sleeved top and pant set in an all-over cartoon dinosaur print. Both sets were sold with a matching eye mask cover. The SKU associated with the recalled products are Sknight10190731477 and Sknight10191129405, which is printed on the hangtag inside the garment.

Remedy:

Consumers should immediately take the recalled sleepwear sets away from children and stop using them. SHEIN will contact all known purchasers. Upon returning the garment, SHEIN will refund consumers the purchase price and provide a \$10.00 gift card. If you do not receive communication from SHEIN, please use the consumer contact information indicated below.

Incidents/Injuries:

None reported

Sold At:

Online at www.shein.com from August 2019 through January 2021 for \$8.

Manufacturer(s):

Puning Han Huini, of China

Retailer

Zoetop Business Co. Ltd. of Hong Kong

Manufactured In:

China

Recall number:

21-769



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Sleepwear Recalled Due to Violation of Federal Flammability Standards and Burn Hazard; Imported by Kids Tales; Sold Exclusively at Amazon.com



Recalled Kids Tales pajamas, various print designs

**Name of Product:**

Children's Pajamas

Hazard:

The children's pajamas fail to meet the flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

June 30, 2022

Units:

About 9,100

Consumer Contact

Kids Tales by email at fzskmyyxgs@outlook.com, or online at http://www.fzskmyyxgs.com/bk_25682537.html for more information.

Recall Details

Description:

This recall involves Kids Tales-branded children's 95% cotton and 5% elastane pajamas. They were sold in various print designs and colors, and individually or as a set of two. The single-piece, short-sleeved, footless pajamas were sold in five sizes 66 (3-6 Months), 73 (6-12 Months), 80 (12-18 Months), 90 (18-24 Months), and 100 (2-3T) and in various prints. "Kids Tales," "Made in China" and the size are printed on the pajama's neck label.

Remedy:

Consumers should immediately take the recalled sleepwear away from children and contact Kids Tales for a full refund. Consumers who purchased the pajamas will be asked to destroy the garments by cutting them in half and send the recalling firm a photo of the destroyed garment. Upon receipt of the photo, consumers will be issued a full refund of the purchase price.

Incidents/Injuries:

None reported

Sold At:

Online at www.amazon.com from November 2021 through April 2022 for between \$13 and \$33, depending on the style and if sold individually or as a set.

Importer(s):

Kids Tales, of China

Manufactured In:

China

Recall number:

22-177



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Children's Sleepwear Recalled Due to Violation of Federal Flammability Standards and Burn Hazard; Imported by Loulou Lollipop



Recalled Loulou Lollipop tight-fitting pajamas - long-sleeves, avocado print

**Name of Product:**

Children's pajamas

Hazard:

The children's pajamas fail to meet the tight-fitting flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

June 16, 2022

Units:

About 1,300

Consumer Contact

Loulou Lollipop toll-free at 833-456-8568 from 9:30 a.m. to 3 p.m. PT Tuesday and Friday, email at customercare@louloulollipop.ca, online at www.louloulollipop.com/pages/product-safety-recalls or www.louloulollipop.com

and type "PRODUCT RECALL INFORMATION" in the search bar at the top of the page for more information.

Recall Details

Description:

This recall involves Loulou Lollipop children's pajamas made of 66% Tencel lyocell, 28% organic cotton and 6% spandex. The one-piece, long-sleeved pajamas were sold in 19 prints: Avocado, Bluebell, Butterfly, Canyon Rainbow, Flower Vine, Grey Mudcloth, Morning Dew, Moon, Nomad, Peace Dove, Planets, Painterly Seahorses, Rainbow Dye, Shell Floral, Sepia Rose, Sepia Rose Floral, Seashells, Sun, And Umbra. The tight-fitting sleepwear was sold in two children's sizes 12-18M and 18-24M. "Loulou Lollipop," size and purchase number are printed at the neck. The purchase numbers included in this recall are SS22-GR-APP-001 and AW2021-APP001.

Remedy:

Consumers should immediately take the recalled sleepwear away from children and contact Loulou Lollipop for a full refund. Consumers who purchased the sleepwear will be asked to destroy the garments by cutting them in half and sending the firm a photo of the destroyed product, including the neck label. Upon receipt of the photos, consumers will be issued a full refund or a store gift card. The firm is contacting all known purchasers directly.

Incidents/Injuries:

None reported

Sold At:

Online at www.louloulollipop.com and at various children's boutiques nationwide from November 2021 through May 2022 for between \$29 to \$38.

Importer(s):

Loulou Lollipop, of Canada

Manufactured In:

China

Recall number:

22-165



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Copper Pearl Recalls Children's Sleepwear Due to Violation of Federal Flammability Standards and Burn Hazard



Recalled Copper Pearl tight-fitting pajamas - long-sleeves, fawn print



**Name of Product:**

Children's pajamas

Hazard:

The children's pajamas fail to meet the tight-fitting flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

May 26, 2022

Units:

About 1,300

Consumer Contact

Copper Pearl toll-free at 888-732-7506 between 9 a.m. and 5 p.m. MT Monday and Wednesday, email at support@copperpearl.com, online at <https://www.copperpearl.com/pages/legal-and-safety> or www.copperpearl.com and type "PRODUCT RECALL INFORMATION" in the search bar at the top of the page for more information.

Recall Details

Description:

This recall involves Copper Pearl children's pajamas made of 69% polyester, 28% rayon and 3% spandex. The two-piece, long-sleeved pajamas were sold in two prints: fawn and polar. The tight-fitting sleepwear was sold in children's sizes 12M, 18M, 2T, 3T, 4T and 5T. "Made by Copper Pearl," size and RN 151055 are printed at the neck.

Remedy:

Consumers should immediately take the recalled sleepwear away from children and contact Copper Pearl for a full refund. Consumers who purchased the sleepwear directly from Copper Pearl will be contacted via email and provided prepaid mailers to return the garment(s) for a full refund. Consumers who purchased the sleepwear at retail locations will be asked to destroy the garments by cutting them in half and sending the firm a photo of the destroyed product, including the neck label. Upon receipt of the photos, consumers will be issued a full refund and a 20% off discount code towards another purchase.

Incidents/Injuries:

None reported

Sold At:

Online at www.copperpearl.com and at various children's boutiques nationwide from November 2021 through February 2022 for about \$35.

Importer(s):

Copper Pearl Inc., of Salt Lake City, Utah

Manufactured In:

India

Recall number:

22-139



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Dondolo Recalls Children's Sleepwear Due to Violation of Federal Flammability Standard



pajama set



**Name of Product:**

Children's nightgowns and two-piece pajama sets

Hazard:

The children's nightgowns and two-piece pajama sets fail to meet the federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

November 01, 2017

Units:

About 3,100

Consumer Contact

Dondolo at 800-659-5370 from 9 a.m. to 5 p.m. CT, Monday through Friday, email at recall@dondolo.com or online at www.dondolo.com and click on "Product Safety" for more information.

Recall Details

Description:

This recall involves children's 100% cotton woven, nightgowns and two-piece, long-sleeve top and pant pajama sets. The nightgown has a peter pan collar with a red and white gingham pattern trim. The nightgown has six plastic buttons located on the back of the garment. The two-piece pajama set is traditionally styled with five plastic buttons on the center-front of the top with two pockets placed near the waist of the top. The pajama sets were sold in striped light blue, striped navy, striped red, striped pink, and lavender. The garments were sold in sizes 12 months, 18 months, 24 months, 2T, 3T, 4T, 5, 6, 7, 8, 9, and 10 years.

Remedy:

Consumers should immediately take the recalled nightgowns and two-piece pajama sets away from children and contact Dondolo for a gift card for the full purchase price for use towards any product at www.dondolo.com.

Incidents/Injuries:

None reported

Sold At:

Children's boutique stores nationwide and online at www.dondolo.com from November 2014 through October 2017 for between \$15 and \$50.

Manufacturer(s):

Dondolo, of Carrollton, Texas

Distributor(s):

Dondolo, of Carrollton, Texas

Manufactured In:

Colombia

Recall number:

18-021



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Eleanor Rose Recalls Children's Loungewear Due to Violation of Federal Flammability Standard



Nutcracker Clara gown



**Name of Product:**

Children's loungewear

Hazard:

The loungewear fails to meet federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

April 05, 2016

Units:

About 5,900

Consumer Contact

Eleanor Rose toll-free at 855-816-4649 from 8 a.m. to 4:30 p.m. CT Monday through Friday, email hello@eleanorrose.com or online at www.eleanorrose.com and click on the Product Recall link at the bottom of the page for more information.

Recall Details

Description:

This recall involves two different styles of Eleanor Rose loungewear, including a girl's gown and a boy or girl's top and pants set. The loungewear was sold in sizes 12 months through size 12. "Eleanor Rose" is printed on a tag sewn into the neck of the garments and on the back outside of the pants. The style number is on a tag sewn into the side seam or inside the back of the pants. The recalled loungewear style names and numbers include:

Style Name	Style Number
Holly Child's lounge set	36-PP05
Nutcracker Clara gown	37-NC01 and 60-RN02
Nutcracker lounge set	37-NC02
Noel child's lounge set	39-NI04
Nutcracker striped lounge set	39-PJ01
Be Mine child's lounge set	40-BM05
Be Mine Rose gown	40-BM15
Be Mine striped gown	40-BM16
Nutcracker boy's lounge set	60-RN04
Child's lounge set	63-SN03

Silent Night gown**63-SN13****Remedy:**

Consumers should immediately take the recalled loungewear away from children and return it to Eleanor Rose for a merchandise credit towards the purchase of another Eleanor Rose product.

Incidents/Injuries:

None reported

Sold At:

Online at www.eleanorrose.com from November 2014 through February 2016 for about \$30.

Importer(s):

Eleanor Rose, of Natchez, Miss.

Manufactured In:

El Salvador

Recall number:

16-135



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Esme Recalls Children's Sleepwear Due to Violation of Federal Flammability Standards and Burn Hazard



Recalled Esme Children's Sleepwear Garments



Name of Product:

Children's Sleepwear Garments

Hazard:

The recalled children's sleepwear garments fail to meet the flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Replace

Recall Date:

February 16, 2022

Units:

About 3,600


Consumer Contact

Esme toll-free at 833-961-7011 from 9:30 a.m. to 3 p.m. PT Monday through Friday, email at recall@esmewear.com or online at <https://esmewear.com/pages/safety-information> or www.esmewear.com and click on Safety Information at the bottom of the webpage for additional information.

Recall Details

Description:

This recall involves four different styles of children's sleepwear garments; bunny, cherry, unicorn and shimmer sweets prints made of modal, cotton and spandex. The children's sleepwear was sold in sizes 12 months to 14 years. Children's sleepwear with the style number beginning with SF9 and a cut number of 1812, 2730, 7082 or 7104 printed on a label behind the garment's size and care labeling are included in the recall.

Garment	Description	Size Range	Price
	Bunny Print	12 Months, 18-24 Months,	\$47
		2T, 3T, 4T, 5, 6, 7, 8, 9, 10,	-
	Style Number	12, and 14.	\$65
	SF977		
	Cut Number		
	7082		
	Long Sleeve		
	Top/Pant Pajama		

Set

47%Modal

47%cotton

6%spandex



Cherry Print

2T, 3T, 4T, 5, 6, 7, 8, 9, 10,
12, and 14.

\$50

-

Style Number

\$63

SF937/57

Cut Number

2730

Short

Sleeve/Crop

Legging Pajama

Set

47%Modal

47%cotton

6%spandex

Unicorn Print

Style Number

SF900/57



Cut Number 1812

2T, 3T, 4T, 5, 6, 7, 8, 9, 10,	\$48
12, and 14.	- \$61

Cami/Legging

Pajama Set

47%Modal

47%cotton

6%spandex



Shimmer	2T, 3T, 4T, 5, 6, 7, 8, 9, 10,	\$50
---------	--------------------------------	------

Sweets Print	12, and 14.	-
--------------	-------------	---

\$64

Style Number

SF950/57

Cut Number

7104

3 /4 Sleeved Top
and Pant Pajama
Set

47%Modal

47%cotton

6%spandex

Remedy:

Consumers should immediately take the recalled sleepwear garments away from children, stop using them and contact the firm for a free replacement garment or a full refund. Esme is contacting all known purchasers and providing prepaid mailers to return the products for a full refund or replacement.

Incidents/Injuries:

None reported

Sold At:

Online at www.esmewear.com and children's boutiques nationwide from May 2021 through August 2021 for between \$45 and \$65.

Manufacturer(s):

Bottoms R US Inc, d/b/a Esme, of City of Industry, California

Manufactured In:

United States

Recall number:

22-080



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Free Birdees Recalls Children's Pajamas Due to Burn Hazard (Recall Alert)



Recalled Free Birdees tight-fitting pajamas - long-sleeves, green tractor print



**Name of Product:**

Children's pajamas

Hazard:

The children's pajamas fail to meet the federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

May 26, 2022

Units:

About 1,530

Consumer Contact

Free Birdees at 800-846-2780 from 10 a.m. to 5 p.m. PT Monday through Friday, or online at <https://freebirdees.com/pages/recall-notice> or www.freebirdees.com and click on "Product Recall Information" at the top right-hand corner of the page for more information.

Recall Details

Description:

This recall involves Free Birdees' children's 95% viscose and 5% spandex pajamas. The two-piece, short or long-sleeved pajamas, were sold in sizes 6-12 months, 12-18 months, 18-24 months, 2T, 3T, 4T, 5, 6, 7, 8, 10, and 12, and in three prints: green tractor, green stripe and tropical fish. Free Birdees, the size and RN 157155 are printed at the neck.

Remedy:

Consumers should immediately take the recalled pajamas away from children and contact Free Birdees for a full refund. Consumers who purchased the sleepwear garments will be asked to destroy the garments by cutting them in half and send the recalling firm a photo of the destroyed garment and of the garment's neck label. Upon receipt of the photos, consumers will be issued their choice of either a full refund or a store gift card. Free Birdees is contacting all known purchasers directly.

Incidents/Injuries:

None reported

Sold At:

Online at www.freebirdees.com from September 2021 through February 2022 for between \$34 and \$35.

Importer(s):

Free Birdees LLC, of Culver City, California

Manufactured In:

China

Recall number:

22-749



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

FULLBEAUTY Brands Recalls Children's Nightgowns Due to Violation of Federal Flammability Standard (Recall Alert)



FULLBEAUTY "daughter Henley" children's nightgowns



**Name of Product:**

Children's nightgowns

Hazard:

The nightgowns fail to meet federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

October 04, 2016

Units:

About 31,500

Consumer Contact

FULLBEAUTY Brands at 800-313-8803 from 8:30 a.m. to 5:30 p.m. ET Monday through Friday, email fbrecall@fbbrands.com or online at www.fbbrands.com and click on Recall Information for more information.

Recall Details

Description:

This recall involves girl's Dreams & Co.® by FULLBEAUTY Brands knit cotton jersey "daughter Henley" styled nightgown. The nightgowns have picot edge trim and a button placket on the center front of the chest. The nightgowns were sold in children's sizes: 6/6X, 7/8 and 10/12 in the following five different prints. The style number is printed on the side seam label of the nightgown.

Color Name	Style Number
Dark Navy Snowmen	0132
Sky Blue Hot Cocoa	1012
Pink Scotties	1330
Chocolate Cookies	1332
Violet Snowflake	1988
White Candy Cane	0013

Remedy:

Consumers should immediately take the recalled nightgowns away from children and contact the firm for instructions on receiving a full refund or a company gift card for 125% of the purchase price. The firm is contacting consumers that purchased the recalled nightgowns.

Incidents/Injuries:

None reported

Sold Exclusively Online:

www.Amazon.com, www.jessicalondon, www.roamans.com and
www.womanwithin.com from August 2009 through July 2016 for between \$13 and \$20.

Importer(s):

FULLBEAUTY Brands L.P., of New York

Manufactured In:

Pakistan

Recall number:

17-702



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Go Couture Recalls Children's Loungewear Due to Violation of Federal Flammability Standard

Lounge Sets



Recalled Blue and Pink Go Couture Children's Loungewear



Name of Product:

Children's loungewear sets

Hazard:

The children's loungewear sets fail to meet the federal flammability standard for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

April 17, 2019

Units:

About 120

Consumer Contact

Go Couture at 800-261-6899 from 9 a.m. to 5 p.m. ET Monday through Friday, email at moshe@gojeans.com or online at www.gocouturekids.com and click on "Product Safety Recall" for more information.

Recall Details

Description:

This recall involves Go Couture children's loungewear sets. The sets are made of 47% polyester, 47% rayon and 6% spandex blended knit with a long-sleeve top and pant set. The long-sleeve top has a Henley neckline. The pants have an elastic waist band and a ribbed cuff at the ankle. The loungewear sets were available in pink and blue and sold in children's sizes 12 months to 12 years. "GoCoutureKids" is printed inside the garment on the neck label.

Remedy:

Consumers should immediately stop using the recalled loungewear and contact Go Couture for a full refund.

Incidents/Injuries:

None reported

Sold At:

Uname it, Pajama Mama, Blew Boutique and other children's stores nationwide and online at gocouturekids.com from August 2016 through November 2018 for \$38.

Distributor(s):

Go Couture, of Vernon, Calif.

Manufactured In:

United States

Recall number:

19-106



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

H&M Recalls Children's Bathrobes Due to Violation of Flammability Standard (Recall Alert)



Recalled gray children's hooded bathrobe in blue or pink



**Name of Product:**

Children's Bathrobes

Hazard:

The children's hooded bathrobes fail to meet the flammability standard for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

April 15, 2019

Units:

About 980 (in addition, about 60 were sold in Canada)

Consumer Contact

H&M toll-free at 855-466-7467 from 7 a.m. to 12 a.m. CT any day of the week or online at www.hm.com and click on Legal & Privacy and then Recalled Items for more information.

Recall Details

In Conjunction With:



Description:

This recall involves H&M children's hooded bathrobes. The affected robes come in two styles, both are 100% cotton. The first style comes in gray with the inside lining in either white and pink or white and blue. The robe comes in sizes for 6 months to 3 years old and has a button closure on the right-hand side of the chest. The second style comes in sizes for 6-12 months, is white with an embroidered cat's face on the hood, two ears attached to the top, and a belt.

Remedy:

Consumers should immediately stop using the bathrobes and contact H&M for a full refund and a \$20 gift card. H&M is contacting all purchasers directly.

Incidents/Injuries:

None Reported

Sold At:

Online at www.hm.com between October 2018 through March 2019 for between \$25 and \$30.

Manufacturer(s):

H&M Hennes & Mauritz L.P., of New York, N.Y.

Importer(s):

H&M Hennes & Mauritz L.P., of New York, N.Y.

Manufactured In:

China

Recall number:

19-736



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

H&M Recalls Children's Pajamas Due to Violation of Federal Flammability Standard



Recalled H&M children's pajamas



**Name of Product:**

Children's pajamas

Hazard:

The children's pajama sets fail to meet the flammability standard for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

July 25, 2019

Units:

About 9,000

Consumer Contact

H&M toll-free at 855-466-7467 from 7 a.m. to 12 a.m. CT any day of the week or online at www.hm.com and click on Legal & Privacy and then Recalled Items for more information.

Recall Details

Description:

This recall involves two styles of children's 100 percent cotton knit, long-sleeve top and pant pajama sets. The pajamas were sold in sizes 2 through 10.

The first style was sold as a set of two pajamas. The recalled tops from this set include: a pink long-sleeve top with a dog's face screen-printed onto the front, and two extended 3D fabricated ears. The gray long-sleeve top includes a pink bow trim located at the neckline, a pink heart screen-printed on the left chest and is paired with long pants (pink and polka dot print.) Both the top with the dog's face and the gray top with the pink bow are being recalled. The product code for this pajama set is 0494860.

The second style was sold as a single set. The recalled top is a white long-sleeve top with a cat's face screen-printed on the front with two extended 3D fabricated ears, paired with long white polka dot pants. Only the top is included in this recall. The product code for this pajama set is 0537645.

The seven-digit product (P/N) number is located on the wash care label inside the garment.

Remedy:

Consumers should immediately stop using the recalled pajama tops and contact H&M for a full refund, plus a \$20 gift card.

Incidents/Injuries:

None Reported

Sold At:

H&M stores nationwide and online at www.hm.com from July 2018 to May 2019 for between \$14.99 and \$24.99.

Importer(s):

H&M Hennes & Mauritz L.P., of New York, N.Y.

Manufactured In:

Bangladesh

Recall number:

19-176



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Joey Clothing Recalls Children's Robes Due to Burn Hazard



Recalled Leveret children's robes in black, blue and gray



Name of Product:

Children's robes

Hazard:

The children's robes fail to meet flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

June 02, 2022

Units:

About 15,930 (In addition, 16 in Canada)

Consumer Contact

Joey Clothing Inc. toll-free at 844-338-3738 from 9 a.m. to 5 p.m. ET, Monday through Friday email at productrecall@leveret.com or online at www.leveret.com/pages/robesproductrecall or www.leveret.com and click on "PRODUCT RECALL INFORMATION" at the top of the page for more information.

Recall Details

In Conjunction With:



Description:

This recall involves Leveret branded children's robes. The robes are made of cotton and nylon, have an attached hood, cuffed wrists, two functional front pockets and a detachable belt. The robes were sold in children's sizes 12-18 months through size 14 and in the following colors: black, dark blue, green, gray, navy, pink, purple and white. The sewn-in neck label displays the brand Leveret, the robe's size, material content, washing instructions and "Made in China."

Remedy:

Consumers should immediately take the recalled robes away from children, stop using them and contact Joey Clothing for a full refund. Consumers who purchased the robes from Amazon.com will be contacted through Amazon's messaging platform. Consumers who purchased the robes directly from Joey Clothing, Nordstrom Rack and Zulily will be contacted via email.

Consumers must cut the robes in half and send photo proof of the destroyed robes and sewn-in label to receive a \$30 refund via email at productrecall@leveret.com. Joey Clothing will refund \$35 to consumers who show a receipt of the full purchase price. Consumers without a receipt will be refunded \$30.

Incidents/Injuries:

None reported

Sold At:

Online at amazon.com, leveret.com, nordstromrack.com and zulily.com from November 2020 through January 2022 for between \$30 and \$35.

Importer(s):

Joey Clothing Inc., of Moonachie, New Jersey

Manufactured In:

China

Recall number:

22-145



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

H&M Recalls Children's Sleepwear Sets Due to Violation of Federal Flammability Standards and Burn Hazard (Recall Alert)



Children's Recalled Sleepwear Set – Light Pink (Product ID Number 1044037001)



**Name of Product:**

Children's Sleepwear Sets

Hazard:

The children's sleepwear sets fail to meet the federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

February 17, 2022

Units:

About 615 (In addition, 100 in Canada)

Consumer Contact

H&M Customer Service toll-free at 855-466-7467 from 7 a.m. to 12 a.m. CT any day of the week or online at https://www2.hm.com/en_us/index.html and click on Customer Service at the top of the page and then "Recalled Items" under the Products and Quality section for more information, or

https://www2.hm.com/en_us/customer-service/product-and-quality/recalled-items.html

.

Recall Details

In Conjunction With:



Description:

This recall involves children's ribbed-knit 56% rayon, 43% polyester, and 1% spandex, two-piece pajama sets. The pajama set was sold in two colors: light pink and mole (taupe), and in sizes 8-9 Years, 9-10 Years, 10-11 Years, 11-12 Years, 12-13 Years, 13-14 Years and 14+ Years. The garment's external affixed label states, "Every day is a COZY DAY." The garment's neck label states, "H&M." Product ID numbers 1044037001 and 1044037002 can be found on the care label.

Remedy:

Consumers should immediately take the recalled sleepwear sets away from children and stop using them. H&M will contact all known purchasers directly with instructions on how to return the sleepwear sets for a full refund.

Incidents/Injuries:

None reported

Sold Exclusively Online:

Online at www.hm.com from October 2021 through November 2021 for about \$30.

Importer(s):

H&M Hennes & Mauritz L.P., of New York

Manufactured In:

Turkey

Recall number:

22-728



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Joules USA Recalls Children's Pajamas and Robes Due to Violation of Federal Flammability Standard; Burn Hazard



204653-PINKBUNNY Pink robe with bunny ears 100% polyester XS, S, M, L

**Name of Product:**

Children's pajamas and robes

Hazard:

The children's garments fail to meet the federal flammability standard for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

March 05, 2020

Units:

About 12,000 (In addition, about 300 were sold in Canada)

Consumer Contact

Joules USA at 800-583-9559 from 3 a.m. to 1 p.m. ET Monday through Friday, email at product.recall@joules.com with "Recall" as the email subject or online at www.joulesusa.com and click on the "Recall" tab at the top of the page for more information.

Recall Details

In Conjunction With:



Description:

This recall involves Joules girls' and boys' pajamas and robes sold in multiple prints and sizes. Joules is printed on the sewn-in neck label. Garments with the following item numbers, printed on the wash care label, are included on this recall.

Remedy:

Consumers should immediately stop using the recalled garments, take them away from children and contact Joules USA for a full refund.

Incidents/Injuries:

None reported

Sold At:

Children's boutiques nationwide and online at www.joulesusa.com from November 2017 through December 2019 for between \$20 to \$70.

Distributor(s):

Joules USA Inc., of New York and Joules Limited, of England.

Manufactured In:

China and Hong Kong

Recall number:

20-087



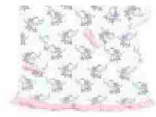
United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Just Blanks Children's Nightgowns Recalled by Ishtex Textile Products Due to Violation of Federal Flammability Standard; Burn Hazard



Recalled Just Blanks-branded nightgown – birthday print



**Name of Product:**

Just Blanks children's nightgowns

Hazard:

The nightgowns fail to meet the federal flammability standard for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

February 27, 2020

Units:

About 450

Consumer Contact

Ishtex Textile Products at 800-935-0914 from 9 a.m. to 5 p.m. ET Monday through Friday, email at salesishtex@gmail.com with "Product Recall" as the email subject or online at www.ishtex.com and click on the Product Recall Notice link at the bottom of the page for more information.

Recall Details

Description:

This recall involves Just Blanks-branded children's 92% cotton and 8% spandex nightgowns. They were sold in sizes 12 months through size 12 and in two prints: Birthday and elephant. The birthday print has blue trim on the bottom and on the sleeves and the trim on the elephant print is pink. Just Blanks and tracking number 20190329 are printed on a sewn-in neck label.

Remedy:

Consumers should immediately take the recalled nightgowns away from children and contact Ishtex Textile Products for a full refund.

Incidents/Injuries:

None reported.

Sold At:

Children's boutiques nationwide from August 2019 through December 2019 for about \$30.

Distributor(s):

Ishtex Textile Products Inc., of Duluth, Ga.

Manufactured In:

China

Recall number:

20-082



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Just Love Fashion Recalls Children's Pajama Pants Due to Violation of Federal Flammability Standard (Recall Alert)



Recalled Prince of Sleep-branded pajama pants



**Name of Product:**

Children's pajama pants

Hazard:

The children's pajama pants fail to meet the flammability standard for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

July 03, 2019

Units:

About 1,400

Consumer Contact

Just Love Fashion toll-free at 888-330-9632 from 9 a.m. to 5 p.m. ET Monday through Friday, email at recall@justlovetofashion.com with "Product Recall" as the email subject and online at www.justlovetofashion.com and click on the Recall link at the top of the page for more information.

Recall Details

Description:

This recall involves Prince of Sleep-branded children's 100 percent micro polyester fleece pajama pants. They were sold in a green football print in sizes 4 through 14/16. Prince of Sleep and the size are printed on the waistband's top sewn-in label. GPU 12001 and FPU 10001 are printed on the label underneath.

Remedy:

Consumers should immediately take the recalled pajama pants away from children and contact Just Love Fashion for instructions on receiving a full refund. Just Love Fashion is contacting all known purchasers directly.

Incidents/Injuries:

None reported

Sold At:

Online at Amazon.com and Ebay.com from August 2017 through March 2019 for between \$6 and \$13.

Importer(s):

M&A Imports Ltd., dba Just Love Fashion, of New York, N.Y.

Manufactured In:

China

Recall number:

19-756



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

K-Apparel Recalls Children's Lounge Pants Due to Violation of Federal Flammability Standard; Burn Hazard (Recall Alert)



Recalled TINFL lounge pants



**Name of Product:**

Children's Lounge Pants

Hazard:

The children's lounge pants fail to meet the flammability standard for children's sleepwear that requires sleepwear to be either snug-fitting or flame resistant, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

January 30, 2020

Units:

About 2,200

Consumer Contact

K-Apparel at 800-201-8734 from 1:30 to 11:30 p.m. ET Sunday through Thursday, email at mir2015@outlook.kr with "Product Recall" in the subject line for more information.

Recall Details

Description:

This recall includes children's 100% cotton lounge pants. The lounge pants were sold in 18 prints. The lounge pants were available in children's sizes small through extra-large. The loungewear pants have the brand name "TINFL" and one of the following lot numbers printed onto an inside side seam label: 58500-51, 58500-52, 58500-53, 58500-54, 58500-55, 58500-56, 58500-57, 58500-59, 58500-60, 58500-61, 58500-62, 58500-63, 58500-65, 58500-66, 58500-67, 58500-69, 58500-70, and 58500-71.

Remedy:

Consumers should immediately take the recalled lounge pants away from children and contact K-Apparel for a full refund. K-Apparel is contacting all known purchasers.

Incidents/Injuries:

None reported.

Sold At:

Online at www.amazon.com from October 2018 through September 2019 for about \$18.

Distributor(s):

K-Apparel, of Buena Park, Calif.

Manufactured In:

South Korea

Recall number:

20-716



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Kreative Kids Recalls Children's Robes Due to Violation of Federal Flammability Standard



Kreative Kids lady bug children's robe



**Name of Product:**

Children's robes

Hazard:

The **children's robes** fail to meet flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

June 01, 2017

Units:

About 7,600

Consumer Contact

Kreative Kids at 800-786-2919 from 9 a.m. to 5 p.m. PT Monday through Friday, email at sales@kreativekids.net or online at www.kreativekids.net and click on "Recall Information" at the bottom of the page for more information.

Recall Details

Description:

This recall includes eight styles of children's 100-percent polyester, hooded robes. The robes were sold in sizes 4-6 and 7-9 in the following styles: purple elephant, lion, pink bear, lady bug, blue puppy, duck, monkey, and princess cat. A label sewn in the robes has item number 2013NW081 and "Kreative Kids" printed on it. The robes also have a hood, long-sleeves, a belt, cinched back and two front pockets.

Remedy:

Consumers should immediately take the recalled robes away from children and contact Kreative Kids for a full refund.

Incidents/Injuries:

None reported

Sold At:

Online at Amazon.com and at gift and specialty stores in California, Iowa, New York, Ohio and Texas from September 2013 through April 2017 for between \$15 and \$17.

Importer(s):

Kreative Kids Inc., of Pomona, Calif.

Distributor(s):

Kreative Kids Inc., of Pomona, Calif.

Manufactured In:

China

Recall number:

17-169



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

La Paloma Recalls Girls' Nightgowns Due to Violation of Federal Flammability Standard; Burn Hazard (Recall Alert)



Recalled La Paloma Girl's Nightgown – Paloma Stripe



**Name of Product:**

Girls' Nightgowns

Hazard:

The recalled children's nightgowns fail to meet flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

June 24, 2021

Units:

About 70

Consumer Contact

La Paloma, email care@shoplapaloma.com or online at shoplapaloma.com and click on "Safety Notice" at the bottom of the FAQ page for more information.

Recall Details

Description:

This recall involves La Paloma “Girl’s Nightgowns.” They are 100% cotton and were sold in sizes 2 through 9 and in the following prints: Little Wings, Paloma Stripe, Evergreen, Scandi Shapes, and Holly Horse. The long-sleeved nightgowns have an elastic pleated neckline and wrists. “100% Cotton. Made ethically in China. Turn inside out, machine wash cool with like colors tumble dry low. Do not bleach or iron” is printed on the care label.

Remedy:

Consumers should immediately stop using the recalled children’s nightgowns and contact La Paloma for a full refund. La Paloma is contacting all known purchasers directly.

Incidents/Injuries:

None reported

Sold At:

Online at shoplapaloma.com from November 2020 through December 2020 for about \$58.

Importer(s):

La Paloma, of Austin, Texas

Manufactured In:

China

Recall number:

21-757



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Lands' End Recalls Children's Pajamas and Robes



Lands' End Boys Fleece Pajamas



**Name of Product:**

Children's Pajamas and Robes

Hazard:

The pajamas and robes fail to meet federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

March 27, 2015

Units:

About 173,000

Consumer Contact

Lands' End toll-free at (800) 300-7487 from 7 a.m. to 11 p.m. CT daily or email customercare@landsend.com. Consumers can also visit the firm's website at www.landsend.com and click on "Recall and Safety Info" for more information, including photos of all styles and colors.

Recall Details

Description:

This recall involves 25 styles of boys, girls and toddler sleep sets, sleepers, pants, nightgowns and robes sold in 100% polyester fleece or knit. The garments were sold in sizes 3 months to 16 (girls) and 20 (boys), and in various colors and patterns. The style number is printed on a tag affixed to the garments' neck, waist or side seam. Style numbers included in the recall are:

Style Number - Description

434255 TODDLER GIRL LONG SLEEVE SOLID FLEECE HOODED ROBE

439935 BOY KNIT SLEEP PANT SET

441286 LITTLE BOY KNIT SLEEP PANT SET

441540 TODDLER BOY KNIT SLEEP PANT SET

444983 TODDLER BOY FLEECE PAJAMA SET

444986 TODDLER BOY FLEECE SLEEP PANT

444991 TODDLER BOY FULL ZIP FLEECE SLEEPER

444999 TODDLER BOY HOOD FLEECE PRINTED ROBE

445595 TODDLER BOY SOLID HOODED FLEECE ROBE

445927 TODDLER GIRL SLEEP FLEECE SET

445930 INFANT LONG SLEEVE FULL-ZIP FLEECE SLEEPER

445933 TODDLER GIRL PRINT HOODED FLEECE ROBE

447284 BOY FLEECE OPEN BTM PAJAMA SET

447285 BOY FLEECE SLEEP PANT

447286 BOY FULL ZIP FLEECE SLEEPER

447287 BOY PRINT HOODED FLEECE ROBE

447288 BOY SOLID HOODED FLEECE ROBE

447352 GIRL LONG SLEEVE FLEECE SHIRRED GOWN

447353 GIRL LONG SLEEVE FULL-ZIP FLEECE SLEEPER

447354 GIRL LONG SLEEVE PRINT HOODED FLEECE ROBE

447357 GIRL KNIT SLEEP TOP

447359 GIRL LONG SLEEVE SOLID FLEECE HOODED ROBE

447361 GIRL SLEEP FLEECE PANT

447362 GIRL SLEEP FLEECE SET

448521 TODDLER GIRL LONG SLEEVE FLEECE GOWN

Remedy:

Consumers should immediately take the recalled sleepwear away from children and return it to Lands' End for a full refund. Lands' End is notifying all known consumers

and will provide a prepaid mailing label. Consumers who return the recalled garments will receive a \$15 Lands' End gift card.

Incidents/Injuries:

None reported.

Sold Exclusively At:

Landsend.com and Lands' End kid's catalogs from January 2014 through February 2015 for between \$19 and \$35.

Manufactured In:

China

Recall number:

15-724



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

LIVLY Recalls Children's Sleepwear Due to Violation of Federal Flammability Standard



Children's long-sleeve robes



**Name of Product:**

Children's robes and two-piece pajama sets

Hazard:

The children's robes and pajama sets fail to meet federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

March 14, 2017

Units:

About 1,200

Consumer Contact

LIVLY toll-free at 844-350-7728 from 9 a.m. to 5 p.m. Monday through Friday or online at www.livlyclothing.com and click on "Product Recall" at the bottom of the page for more information.

Recall Details

Description:

This recall involves children's robes and two-piece pajama sets. The recalled two-piece sets are a long-sleeve top and pants and have a sewn-in side fabric label that has "LIVLY," "www.livlyclothing.com" and RN number 146214 printed on it. The two-piece sets also have a printed label with "LIVLY" on the back of the neck and at the back of the pants. The recalled robes have a chest pocket on the left side with the word "Mini" embroidered on it, two pockets at the bottom and one snap-closure on the right side above the abdomen for closure. A belt is attached to the center back of the robe and an outline of a sleeping face is embroidered on the back of the robe. A fabric label with "LIVLY" and the size is sewn on the inside of the neck of the robe.

Clothing Item	Color/Print	Fabric	Sizes
Children's two-piece (long-sleeve top and pants) sleepwear sets	Princess Land Pink, Princess Land Blue, Mauve Flower, Pink, Blue Dots, Clouds, Reptiles, Neon Roses, Green Fog, Grey and Black Stars, Pink and Grey Stars, Grey to the Moon and Back, Black to the Moon and Back, and Mini Sleeping Cutie	100% cotton	12-18 months through 12

Children's long- sleeve robes	White with black piping trim	100% cotton	S, M, L
--	------------------------------	----------------	---------

Remedy:

Consumers should immediately take the recalled children's clothing away from children and contact LIVLY for a full refund.

Incidents/Injuries:

None reported

Sold At:

Baby Elaine, Bluebelle, Le Bambini, The Hosiery Boutique, LIVLY and other specialty stores and online at Gilt.com, LivlyClothing.com and other websites from February 2016 through January 2017 for about \$55 for the children's two-piece pajama sets and \$78 for the children's robes.

Importer(s):

LCK Design LLC d/b/a Livly Clothing, Sunny Isles, Fla.

Manufactured In:

manufactured in:

Peru

Recall number:

17-110



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Little Giraffe Recalls Children's Robes Due to Violation of Federal Flammability Standard



Luxe Satin children's blue robe



**Name of Product:**

Luxe Satin children's robes

Hazard:

The **children's robes** fail to meet the federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

June 15, 2017

Units:

About 2,000

Consumer Contact

Little Giraffe toll-free at 866-201-6613 from 10 a.m. to 4 p.m. PT Monday through Friday or online at www.littlegiraffe.com and click on "Recall Information" at the bottom of the page for more information.

Recall Details

Description:

This recall involves Luxe Satin children's long-sleeve robes. The robes are 43 percent acetate with 57 percent rayon, satin outer shell and a 100 percent polyester microfiber inside. The robes were sold in pink, blue and cream in sizes 1 (XS-S/4-6 years), 2 (MD-LG/6-8 years) and 3 (XL-XXL/8-10 years). The robes have two belt loops on each side and an unattached belt. Lot number "21706-DFR001" and "Not Intended for Sleepwear" are printed on the robes inside seam label.

Remedy:

Consumers should immediately take the recalled robes away from children and contact Little Giraffe for a full refund.

Incidents/Injuries:

None reported

Sold At:

Children's specialty stores nationwide and online at www.littlegiraffe.com from November 2012 through March 2017 for about \$100.

Importer(s):

Little Giraffe, of Van Nuys, Calif.

Distributor(s):

Little Giraffe, of Van Nuys, Calif.

Manufactured In:

China

Recall number:

17-178



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Little Mass Children's Sleepwear Recalled by Mass Creation Due to Violation of Federal Flammability Standard



Recalled Little Mass pajama set, style number T927S



**Name of Product:**

Children's nightgowns and pajama sets

Hazard:

The children's nightgowns and pajama sets fail to meet flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

November 01, 2017

Units:

About 2,300

Consumer Contact

Little Mass at 800-977-9086 from 9 a.m. to 5 p.m. PT Monday through Friday, email at infolittlemass@gmail.com or teamlittlemass@gmail.com and online at www.littlemass.com and click on "Product Recall" at the bottom of the page for more information.

Recall Details

Description:

This recall involves children's nightgowns and two-piece pajama sets. The 95 percent rayon and 5 percent spandex sleepwear was sold in a variety of styles in sizes 7 through 14. Little Mass and style number T927S, T933, T935, T935S, T949, T952S or T953 are printed on a sewn-in side seam label.

Remedy:

Consumers should immediately take the recalled sleepwear away from children and contact Little Mass for a full refund.

Incidents/Injuries:

None reported

Sold At:

Nordstrom and children's boutiques nationwide and online at www.littlemass.com from July 2016 through October 2017 for between \$27 and \$42.

Manufacturer(s):

Little Mass, a Mass Creation, Inc. subsidiary, of Los Angeles, Calif.

Distributor(s):

Little Mass, a Mass Creation, Inc. subsidiary, of Los Angeles, Calif.

Manufactured In:

United States

Recall number:

18-020



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Mark of Fifth Avenue Children's Robes Recalled Due to Violation of Federal Flammability Standard and Burn Hazard



Recalled Mark of Fifth Avenue children's robe – navy



**Name of Product:**

Children's robes

Hazard:

The children's robes fail to meet the federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

December 08, 2021

Units:

About 10,000

Consumer Contact

Mark of Fifth Avenue email at mofaproductsafety@gmail.com or online at <https://www.markoffifthavenue.com/> and click "Recall & Safety Info" at the [bottom](#) of the web page for more information.

Recall Details

Description:

This recall involves Star Art in Linen-branded children's 100% polyester robes. The robes were sold in six children's sizes 2, 3-4, 5-6, 6-7, 7-8, and 10-12 in the following seven colors: black, navy, blue plaid, red plaid, red, royal blue, and gray. The long-sleeved robes have two front pockets and two side seam belt loops with a matching belt. "Made in China" and "100% Polyester" are printed on a sewn-in label in the robes seam.

Remedy:

Consumers should immediately take the recalled children's robes away from children and contact Mark of Fifth Avenue. Consumers can receive a full refund of the purchase price of the garment by cutting the robes in half, taking a photo of the cut garment, and sending an email to mofaproductsafety@gmail.com with the photos. All known purchasers will be contacted.

Incidents/Injuries:

None reported

Sold At:

Online at www.Amazon.com and www.Walmart.com from August 2019 through June 2021 for between \$35 and \$45.

Manufacturer(s):

Mark of Fifth Avenue, of Harriman, N.Y.

Manufactured In:

China

Recall number:

22-027



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

One Stop Shop Recalls Children's Pajamas Due to Violation of Federal Flammability Standard: Sold Exclusively at Foreman Mills



Recalled pajama set – Santa Claus print



**Name of Product:**

Children's pajama sets

Hazard:

The children's pajamas fail to meet the federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

December 08, 2017

Units:

About 350

Consumer Contact

One Stop Shop toll-free at 888-884-7202 from 8 a.m. to 3 p.m. ET Monday through Friday or email onestopshoplcc1001@outlook.com

Recall Details

Description:

This recall involves children's 100 percent cotton knit, two-piece, long-sleeve top and pant pajama sets. They were sold in three different styles: Santa Claus print with a white button and black and gold belt screenprint; Elf screenprint with a white Peter Pan collar, three red buttons and a black and gold belt; and reindeer screenprint on the top with a Faire Isle pattern on the pant and a reindeer on the top. "Mad Engine" "RN 129993" and the size are on the neck label. The pajama sets were sold in children's sizes XXS, XS, S, M, L and XL. Mad Engine claims these recalled pajama sets are counterfeit.

Remedy:

Consumers should immediately take the recalled pajamas away from children and contact One Stop Shop for a full refund.

Incidents/Injuries:

None reported

Sold At:

Foreman Mills stores nationwide from September 2016 through November 2017 for about \$6.

Importer(s):

Karmin Industries, of Canada

Distributor(s):

One Stop Shop, LLC, of Feeding Hills, Mass.

Manufactured In:

China

Recall number:

18-056



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

One Twenty Clothing Company Recalls “Sovereign Athletic” Children’s Robes Due to Violation of Federal Flammability Standard and Burn Hazard



Recalled Sovereign Athletic children's robe - navy

**Name of Product:**

Children's Robes

Hazard:

The children's robes fail to meet the federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

July 07, 2021

Units:

About 140

Consumer Contact

One Twenty Clothing Company US LLC toll-free at 888-764-7763 from 10 a.m. to 3 p.m. CT Monday through Friday, email at product.recall@candypinkgirls.com, or online at www.candypinkgirls.com and click on "Safety Recall" at the bottom of the page for more information on how to receive a refund.

Recall Details

Description:

This recall involves Sovereign Athletic-branded children's robes in navy. The long-sleeved robes have two front pockets and two side seam belt loops with a matching belt. They are made of 100% polyester and were sold in sizes 4 through 16. "Sovereign Athletic," the size of the garment, and "Made in China" are printed on the sewn-in neck label. The sewn-in label at the side seam has the fabric product unit number FPU#W19-FP17, the garment product unit number GPU#W19-GP15, and the production date Jul-19.

Remedy:

Consumers should immediately stop using the recalled garments and contact One Twenty Clothing Company US LLC for instructions on returning the garments with free shipping to receive a full refund.

Incidents/Injuries:

None reported

Sold At:

Children's boutique stores nationwide and online at www.Candypinkgirls.com from December 2019 through May 2021 for about \$50.

Manufacturer(s):

Shanghai Unitex Apparel, of Shanghai, China

Importer(s):

One Twenty Clothing Company US LLC, of Dallas, Texas

Manufactured In:

China

Recall number:

21-160



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

PL Sleep Children's Sleepwear Recalled by Lemur Group Due to Violation of Federal Flammability Standard



PL Sleep children's nightgown

**Name of Product:**

Children's nightgowns

Hazard:

The children's nightgowns fail to meet the flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

February 28, 2018

Units:

About 1,100 (In addition, about 380 were sold in Canada)

Consumer Contact

Lemur Group toll-free at 877-748-6698 from 9 a.m. to 5 p.m. ET, Monday through Friday, email at customercare@petitem.com or online at www.petitem.com and click on Product Notices for more information.

Recall Details

In Conjunction With:



Description:

This recall involves PL Sleep's children's 100 percent polyester nightgowns. The nightgown has a gray and white snowflake print on the long sleeves and a faux Sherpa fleece body with a red scarf, three black buttons and black belt decoration on the front. The sleepwear included coordinating red and white striped socks. PL Sleep and model numbers 17FT62F561 and #101 are printed on a label sewn into the left inside seam. PL Sleep and the size are on the neck label. The nightgowns were sold in children's sizes 2 through 7.

Remedy:

Consumers should immediately take the recalled nightgowns away from children and return the garments, with or without the socks, to the retailer where they were purchased or contact Lemur Group for instructions to get a full refund of the purchase price.

Incidents/Injuries:

None reported

Sold At:

Lord & Taylor, Saks Fifth Avenue and Von Maur stores nationwide and online at Amazon.com and Chasing-Fireflies.com from October 2017 through February 2018 for between \$16 and \$38.

Importer(s):

Lemur Group Inc., owner of the PL Sleep and Petit Lem brands, of Canada

Manufactured In:

China

Recall number:

18-109



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Ragdoll & Rockets Recalls Children's Loungewear Due to Violation of Federal Flammability Standard



Lounge Onesie



Lounge Pant



Cozy Baby Onesie



Lounge Short



Lounge Crew

Recalled Ragdoll & Rockets children's loungewear



**Name of Product:**

Children's loungewear

Hazard:

The children's loungewear fails to meet the flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

September 10, 2019

Units:

About 14,100

Consumer Contact

Ragdoll & Rockets toll-free at 888-669-9313 from 9 a.m. to 3 p.m. PT Monday through Friday, email at recall2775@genexus.us with "Product Recall" as the email subject or online at www.ragdollandrockets.com and click on the "Product Recall" tab at the top of the page for more information.

Recall Details

Description:

This recall involves five styles of children's 100 percent micro polyester fleece sleepwear. The recalled sleepwear was sold in sizes 2 through 6 and S through XL. The recalled styles include a one-piece, hooded and footed children's onesie, pants with waistband drawstring, shorts, long-sleeved crew top and, 'Cozy Baby Onesie'.

The recalled loungewear was sold in the following sixteen prints: Big Stars, Elephant, Ghost Glow, Happy Feet, Hello Bunny, Kitty, Love Paws, Lush Dots, Moon and Stars, Owl, Panda, Pineapple, Polar Bear, Rainbow Glow, Snowman and Winter Deer. The loungewear styles have the following production codes on the care label inside the garment: L47/1705, LPJ/1806 or L47/1710.

Remedy:

Consumers should immediately stop using the recalled loungewear, take it away from children and contact Ragdoll & Rockets for instructions on receiving a full refund.

Incidents/Injuries:

None reported

Sold At:

Sold exclusively at children's boutiques nationwide and online at www.ragdollandrockets.com from May 2018 through May 2019 for between \$16 and \$28.

Distributor(s):

Genexus dba Ragdoll & Rockets, of Gardena, Calif.

Manufactured In:

China

Recall number:

19-204



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

RH Recalls Children's Bath Wraps Due to Violation of Federal Flammability Standard



Recalled RH Animal Bath Wraps



**Name of Product:**

Animal, Heathered Plush and Luxe Sherpa Children's Bath Wraps

Hazard:

The recalled bath wraps fail to meet flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

April 07, 2021

Units:

About 55,700 (In addition, about 3,900 units were sold in Canada)

Consumer Contact

RH toll-free at 833-917-3405 from 6 a.m. to 7 p.m. PT Monday through Friday, and from 8 a.m. to 5 p.m. PT Saturday and Sunday, email at recall@rh.com or online at www.rh.com and click on "Safety Recalls" at the bottom of the page for more information.

Recall Details

In Conjunction With:



Description:

This recall involves three styles of hooded children's bath wraps: Animal, Heathered Plush, and Luxe Sherpa. The bath wraps have attached belts and patch pockets. The size and "RH BABY&CHILD" or "baby & child RESTORATION HARDWARE" are printed on a sewn-in label at the neck.

The Animal Bath Wraps are made of cotton terry and have faces on the hoods sewn to resemble one of the following animals: Bunny (ivory or petal colors), cat, dog, dragon, elephant, lion, monkey, moose or unicorn. They were sold in sizes 2-3 years, 3-4 years and 4-5 years.

The Heathered Plush Bath Wraps are made of a heathered polyester plush fabric and were sold in blue, gray, lilac and pink, and in sizes 18-24 months, 2-3 years, 3-4 years, 4-5 years, 6-7 years and 8-10 years.

The Luxe Sherpa Bath Wraps have a jersey exterior made of a polyester, rayon and spandex blend and a polyester sherpa fleece lining. They were sold in charcoal, gray, ivory, lilac, navy and pink, and in sizes 18-24 months, 2-3 years, 3-4 years, 4-5 years, 6-7 years and 8-10 years.

The SKU or UPC of the bath wraps included in this recall can be found at <https://rh.com/content/page.jsp?id=safety-recalls>. The SKU or UPC is located on the

purchase receipt.

Remedy:

Consumers should stop using the recalled bath wraps and contact RH for a full refund of the purchase price, or credit of \$35 for the Animal Bath Wrap, \$32 for the Heathered Bath Wrap or \$39 for the Sherpa Bath Wrap, if the consumer's purchase price cannot be determined. RH is contacting all known purchasers directly.

Incidents/Injuries:

No incidents or injuries have been reported.

Sold At:

RH Baby & Child Galleries and RH Outlets nationwide and online at www.rh.com and www.rhbabyandchild.com from April 2014 through November 2020 for between \$1 and \$64.

Importer(s):

RH US LLC, of Corte Madera, Calif.

Manufactured In:

China or Turkey

Recall number:

21-102



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Richie House Children's Robes Recalled by Belle Investment Due to Violation of Federal Flammability Standard; Sold Exclusively at Amazon.com



Recalled Richie House children's robe in blue with butterfly print

**Name of Product:**

Children's robes

Hazard:

The children's robes fail to meet federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

August 03, 2017

Units:

About 1,500

Consumer Contact

Richie House toll-free at 844-742-1303 from 9 a.m. to 4:30 p.m. PT Monday through Friday, email at info@richiehouse.com or online at www.richiehouse.com and click on "Recall Information" for more information.

Recall Details

Description:

This recall involves Richie House-branded children's 100% polyester robes. They were sold in youth sizes 4/5 through 12/14 and in four different color/print combinations; red with dog print, blue with butterfly print, pink and white with white polka dots and solid pink. The robes have long-sleeves, a belt and two front pockets. The red robe comes with a hood. "Richie House Los Angeles" and the size are printed on a label sewn into the neck of the robe.

Remedy:

Consumers should immediately take the recalled robes away from children and contact Richie House for a full refund.

Incidents/Injuries:

None reported

Sold Exclusively At:

Amazon.com from December 2015 through March 2017 for between \$20 and \$22.

Distributor(s):

Belle Investment Corporation, of Irvine, Calif.

Manufactured In:

China

Recall number:

17-200



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Richie House Recalls Children's Robes Due to Violation of Federal Flammability Standards and Burn Hazard; Sold Exclusively at Walmart.com



www.richiehouse.com and type "PRODUCT RECALL INFORMATION" in the search bar at the top of the page for more information.

Recall Details

Description:

This recall involves "A Memory In" branded pink children's robes made of 100% polyester. The long-sleeved bathrobes have two front pockets and two side seam belt loops with a matching belt. They were sold in children's sizes 5, 6, 8, 10, 12 and 14. "100% Polyester," "exclusive of trim," and the fabric product unit number and garment production unit number are printed on the side seam label. The fabric product unit number and garment production unit number included in this recall are FPU NO. AM003 and GPU NO. AM003-1.

Remedy:

Consumers should immediately take the recalled robes away from children and contact Richie House for a full refund. Consumers who purchased the robes will be asked to destroy the garments by cutting them in half and send the recalling firm a photo of the destroyed garment and of the garment's side seam label. Upon receipt of the photos, consumers will be issued a full refund. Walmart and Richie House are contacting all known purchasers directly.

Incidents/Injuries:

None reported

Sold At:

Online at www.walmart.com from March 2021 through March 2022 for between \$22 and \$28.

Importer(s):

Richie House, of Irvine, California

Manufactured In:

China

Recall number:

22-172

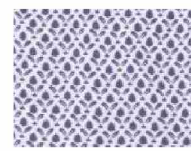


United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Roberta Roller Rabbit Recalls Children's Pajama Sets



Long-sleeved Set (Babar)



**Name of Product:**

Children's Pajama Sets

Hazard:

The children's pajama sets fail to meet federal flammability standards for children's sleepwear, posing a risk of burn injury to children.

Remedy:

Refund

Replace

Recall Date:

April 23, 2015

Units:

About 32,000

Consumer Contact

Roberta Roller Rabbit toll-free at (866) 227-6938 from 9 a.m. to 5 p.m. ET Monday through Friday or online at www.robetarollerrabbit.com and click on the Recall tab located under the Product Recall section on the bottom left side of the homepage.

Recall Details

Description:

This recall involves children's pajamas from Roberta Roller Rabbit by Roberta Freyman. The pajamas are 100% cotton, two-piece pajama sets sold in toddler size 1 through youth 12. The sets were sold in two styles; long-sleeve with pants or short-sleeve with shorts. Both styles were sold in eighteen prints in various colors; Babar, Bump, Christopher, Colada, Dino, Elephant, Goby, Hathi, Heart, Heebo, Moby, Monkey, Owl, Rain, Rico, Scotty, Teddy, and Ticochon. Roberta Roller Rabbit is identified on a yellow label sewn into the neck and waist of both the top and bottom. This recall includes all children's sleepwear garments with a sewn-in label at the neck. Garments that are screen printed at the neck are not affected.

Remedy:

Consumers should immediately take the recalled pajamas away from children, stop using them and return them to Roberta Roller Rabbit for instructions on receiving a free replacement pajama set or a full refund.

Incidents/Injuries:

None reported

Sold At:

Roberta Roller Rabbit retail stores, online at www.robetarollerrabbit.com and through other retail and wholesale outlets from January 2012 through February 2015 for between \$55 and \$65.

Importer(s):

Roberta Roller Rabbit, of New York, N.Y.

Manufactured In:

Peru

Recall number:

15-122



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

SAMpark Recalls Children's Pajamas Due to Violation of Federal Flammability Standard



Seahorse children's pajamas



**Name of Product:**

Children's pajamas

Hazard:

The pajamas fail to meet the federal flammability standard for children's sleepwear that requires sleepwear to be either snug-fitting or flame resistant, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

August 20, 2019

Units:

About 185

Consumer Contact

SAMPark collect call at 860- 906-6285 from 10 a.m. to 4 p.m. ET Monday through Friday, email at sales@samparkusa.com or online at www.samparkusa.com and click on the "Product Recalls" tab located under the "Help Tab" for more information.

Recall Details

Description:

This recall includes children's 100 percent cotton knit, two-piece short-sleeve top and pant pajama sets. The pajama sets were sold in sizes 6 to 12 months through size 10Y. The recalled pajama sets have the following prints: Acrofish Neon, Crab, Elephant, Jellyfish, Mooch, Monkey, and Seahorse. A sewn-in neck label states "almirah www.almirah.com."

Remedy:

Consumers should immediately take the recalled pajamas away from children and contact SAMpark for a full refund.

Incidents/Injuries:

None reported

Sold At:

Nine children's boutique stores: Annabelles (Massachusetts), Banbury Cross (Louisiana), Elegant Child (Florida), Joanna's Cuties (New Jersey), Lamb's Ear (North Carolina), Matilda's (Florida), Saltwater (Connecticut), Stella & Ruby (New York) and Whimsies (Virginia) from August 2018 through July 2019 for about \$30.

Distributor(s):

SAMpark LLC, of Bloomfield, Conn.

Manufactured In:

India

Recall number:

19-185



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Smocked Threads by Cecil & Lou Recalls Children's Nightgowns Due to Violation of Federal Flammability Standard (Recall Alert)



Girl's Smocked Threads by C&L tunic nightgown





Name of Product:

Children's nightgowns

Hazard:

The nightgowns fail to meet federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

July 26, 2016

Units:

About 130

Consumer Contact

Smocked Threads by Cecil & Lou collect at 903-372-4414 from 9 a.m. to 5 p.m. CT Monday through Friday, email at cecilandlou@yahoo.com or online at www.cecilandlou.com and click on the "Product Recall" link at the bottom of the page for more information.

Recall Details

Remedy:

Consumers should immediately take the recalled nightgowns away from children and return them to the firm for a full refund, including shipping, or a merchandise credit of \$23. Cecil & Lou is contacting all known purchasers directly.

Incidents/Injuries:

None reported

Sold Exclusively At:

Online at www.cecilandlou.com from January 2016 through June 2016 for about \$23.

Importer(s):

Smocked Threads by Cecil & Lou, of Tyler, Texas

Manufactured In:

Vietnam

Recall number:

16-761



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Sweet Bamboo Recalls Children's Pajamas Due to Violation of Federal Flammability Standard



Sweet Bamboo light blue gingham children's pajama set



**Name of Product:**

Children's two-piece woven pajama sets

Hazard:

The children's pajamas fail to meet the federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

August 02, 2017

Units:

About 500

Consumer Contact

Sweet Bamboo toll-free at 888-408-2822 from 10 a.m. to 4 p.m. PT, Monday through Friday or online at www.mysweetbamboo.com and click on "Recall Information" at the bottom of the page for more information.

Recall Details

Description:

This recall involves children's 50 percent polyester and 50 percent viscose from bamboo, woven two-piece, short-sleeve shirt and pant pajama sets. The pajama sets were sold in four colors: dark blue gingham, light blue gingham, purple gingham and black pin dot. The pajamas tops have white buttons down the front and the bottoms have an elastic waistband. The pajamas were sold in sizes 12 to 18 months, 18 to 24 months, 2T, 3T, 4T, 5 and 6 years.

Remedy:

Consumers should immediately take the recalled pajamas away from children and contact Sweet Bamboo for a full refund.

Incidents/Injuries:

None reported

Sold At:

Children's boutique stores nationwide and online at www.mysweetbamboo.com from February 2016 through May 2017 for about \$40.

Importer(s):

Sweet Bamboo, of Carlsbad, Calif.

Distributor(s):

Sweet Bamboo, of Carlsbad, Calif.

Manufactured In:

China

Recall number:

17-197



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Target Recalls Children's Cat & Jack Unicorn Cozy Pajama Sets Due to Burn Hazard



Recalled Cat & Jack Unicorn Cozy Pajama Set - Front



**Name of Product:**

Children's pajama sets

Hazard:

The children's pajama sets fail to meet the federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

June 02, 2022

Units:

About 120,000

Consumer Contact

Target at 800-440-0680 from 7 a.m. to 10 p.m. CT daily or online at www.target.com and click on "Recalls" at the bottom of the page, then on "Accessories/Apparel/Shoes" for more information. Consumers can also click the "Product Recalls" tab on Target's Facebook page for more information.

Recall Details

Description:

This recall involves a children's two-piece, long-sleeved top and pant pajama sets. The pajama set is the brand "Cat & Jack" in the "Unicorn Cozy" pattern. The pajama top is black with ivory unicorns and ivory stars with the words "Dream Away" printed in metallic gold lettering. The pajama bottoms are ivory with black unicorns and black stars. The pajama set is 100% polyester and was sold in children's sizes XS, S, M, L and XL. The product item number is printed on the inside sewn-in side seam label on both the pajama top and pant. Pajama sets with the following product item numbers are included in the recall:

Item Number	Item Description
-------------	------------------

075-08-0157	Cat & Jack Unicorn Cozy Pajama Set Size XS
-------------	--

075-08-0158	Cat & Jack Unicorn Cozy Pajama Set Size S
-------------	---

075-08-0159	Cat & Jack Unicorn Cozy Pajama Set Size M
-------------	---

075-08-0160

Cat & Jack Unicorn Cozy Pajama Set Size L

075-08-0161

Cat & Jack Unicorn Cozy Pajama Set Size XL

Remedy:

Consumers should immediately take the recalled pajama sets away from children and return the pajama sets to any Target store location for a full refund. Consumers who purchased the pajama sets on Target.com can contact Target to receive a prepaid return label to return the pajama set for a full refund. The firm is contacting known purchasers directly regarding the recall.

Incidents/Injuries:

None reported

Sold Exclusively At:

Target stores nationwide and Target.com from October 2021 through March 2022 for about \$15.

Importer(s):

Target Corporation, of Minneapolis, Minnesota

Manufactured In:

China

Recall number:

22-142



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

The Company Store Recalls Children's Robes Due to Violation of Federal Flammability Standards (Recall Alert)



Recalled The Company Store children's robes

**Name of Product:**

Children's robes

Hazard:

The children's robes fail to meet the federal flammability standard for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

December 13, 2018

Units:

About 13,000

Consumer Contact

The Company Store at 800-273-7702 from 6 a.m. to midnight CT Monday through Friday and 8 a.m. to 5 p.m. CT Saturday and Sunday or online at www.thecompanystore.com and click on the "Product Recalls" link located under the "Help" link for more information.

Recall Details

Description:

This recall involves The Company Store children's 100% cotton terry robes. They were sold in sizes XS, S, M, L and XL in the following colors: blue, green, gray, orange, pink, purple, red and white. The long-sleeved, hooded robes have two front pockets and two side seam belt loops with a matching belt. "The Company Store," "RN#120962" and a tracking number beginning with either "CS3981DR," "CS0981DR" or "28738" are printed on a sewn-in neck label.

Remedy:

Consumers should immediately take the recalled robes away from children, stop using them and contact The Company Store for a full refund of the purchase price. The firm is contacting all known purchasers directly.

Incidents/Injuries:

None reported

Sold Exclusively At:

Online at www.TheCompanyStore.com from March 2015 through October 2018 for about \$60.

Importer(s):

Home Depot U.S.A., dba The Company Store, of Atlanta, Ga. and Hanover Company Store LLC, of Weehawken, N.J.

Manufactured In:

Turkey

Recall number:

19-721



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

The Company Store Recalls Girl's Pajama Sets Due to Violation of Federal Flammability Standard (Recall Alert)



Recalled unicorn pajama set



**Name of Product:**

Girl's pajama sets

Hazard:

The pajama sets fail to meet the federal flammability standard for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

July 03, 2019

Units:

About 2,500

Consumer Contact

The Company Store at 800-655-0355 from 6 a.m. to Midnight CT Monday through Friday and 8 a.m. to 5 p.m. CT Saturday and Sunday or online at www.thecompanystore.com and click on the Product Recalls tab located under the help tab for more information.

Recall Details

Description:

This recall involves The Company Store's girl's 100% cotton flannel, two-piece pajama sets which also come in matching sets for women and dolls. The pajama sets were sold in sizes 2T through size 14/16 and in the following prints: Unicorn, hedgehog and snowflake. The Company Store, RN#120962, 037114-21018-LOT and style 65002B are printed on a sewn-in, neck label.

Remedy:

Consumers should immediately take the recalled pajamas away from children and contact The Company Store for a full refund. The Company Store is contacting all known purchasers directly.

Incidents/Injuries:

None reported

Sold At:

Online at www.thecompanystore.com from September 2018 through April 2019 for about \$50.

Importer(s):

Home Depot U.S.A., dba The Company Store, of Atlanta, Ga.

Manufactured In:

China

Recall number:

19-757



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

The Red League Recalls Children's Pajamas Due to Burn Hazard



Recalled one-piece, long-sleeved footed pajama sold with matching beanie



**Name of Product:**

Children's pajamas

Hazard:

The children's pajamas fail to meet the federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

April 21, 2022

Units:

About 910

Consumer Contact

The Red League toll-free at 888-754-4030 between 10 a.m. and 5 p.m. ET Monday through Friday, by email at redleaguwarehouse@gmail.com, online at <https://theredleague.com/pages/recall> or <https://theredleague.com/> and click on "RECALL INFORMATION" at the top of the page for more information.

Recall Details

Description:

This recall involves three styles of children's sleepwear garments; one-piece, long-sleeve top and footed pajamas, two-piece, long-sleeve top and pant traditional pajama sets, and two-piece, long-sleeve top and pant pajama sets.

The one-piece, long-sleeve top and footed pajamas are red, have wooden buttons located at the back of the neck and were sold with a matching red beanie hat. The pajamas were sold in sizes 6-12 months and 12-18 months and are made of 80% cotton and 20% polyester.

The two-piece, long-sleeve top and pant traditional pajama sets are red with white piping trim, two front pockets and wooden buttons on the center front. The pajama sets were sold in children's sizes 2, 3, 4, 5, 6, 8, 10, 12 and 14 and are made of 80% cotton and 20% polyester.

The two-piece, long-sleeve top and pant pajama sets are yellow and have a bear embroidered onto the tops' chest. The pajama sets were sold in children's sizes 2, 3, 4, 5, 6, 8, 10, 12 and 14 and are made of 95% cotton and 5% spandex.

"The Red League" and the size are printed on a sewn-in fabric label at the neck of the recalled garments. "Made in China," size, fiber content and washing instructions are printed on a sewn-in, side-seam label.

Remedy:

Consumers should immediately take the recalled pajamas away from children and contact The Red League to receive a pre-paid mailer and instructions on how to return the garment(s) for a full refund. The firm is also contacting consumers who purchased the pajamas directly from The Red League to provide them a prepaid mailer to return the garment for a full refund.

Incidents/Injuries:

None reported

Sold At:

Online at <https://theredleague.com/> and at Elle Ella Boutique stores in California and JellyBeans stores in New York from November 2020 through February 2022 for between \$38 and \$40, depending on the style.

Distributor(s):

The Red League, of Brooklyn, New York

Manufactured In:

China

Recall number:

22-124



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

VIV&LUL Recalls Children's Sleepwear Due to Violation of Federal Flammability Standard; Sold Exclusively at Amazon.com (Recall Alert)



**Name of Product:**

Children's pajamas

Hazard:

The children's pajamas fail to meet the flammability standard for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

November 01, 2017

Units:

About 2,200

Consumer Contact

VIV&LUL by email at tracy@saihui.com or online at www.vivlul.com and click on "News" at the top of the page then "Important Product Safety Recall" for more information.

Recall Details

Description:

This recall involves two styles of children's two-piece pajama sets. The first pajama set is a gray long-sleeve shirt and pant pajama set and is made of 93 percent modal and 7 percent spandex. The shirt has pink trim at the neckline with a pink bow. The text "Happy Day V&L" is printed in pink and white on the center front of the shirt and has a sewn-in side seam label stating "VIV&LUL DL118106." The second pajama set is a yellow, white and blue plaid print, long-sleeve shirt and pant pajama set and is made of 100 percent cotton. The top has four buttons down the center and a sewn-in side seam label stating "VIV&LUL V215770." Both styles were sold in sizes 110cm (4-5 years), 120cm (6-7 years), 130cm (8-9 years), 140cm (10-11 years), 150cm (12-13 years) and 160cm (14-15 years).

Remedy:

Consumers should immediately stop using the recalled sleepwear, take it away from children and contact VIV&LUL for a full refund. The firm is contacting purchasers directly.

Incidents/Injuries:

None reported

Sold At:

Amazon.com from January 2017 through October 2017 for between \$11 and \$17.

Manufacturer(s):

VIV&LUL, of China

Importer(s):

VIV&LUL, of China

Distributor(s):

VIV&LUL, of China

Manufactured In:

China

Recall number:

18-019



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Wohali Outdoors Recalls Children's Sleepwear Due to Violation of Federal Flammability Standard; Sold Exclusively at Bass Pro Shops

pink



Style 6904536 - Deer Camo

**Name of Product:**

Children's three-piece pajama sets

Hazard:

The children's pajama sets fail to meet flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

December 21, 2017

Units:

About 26,800 in the U.S. (In addition, 2,000 units were sold in Canada)

Consumer Contact

Wohali toll-free at 833-282-0442 from 8 a.m. to 5 p.m. CT Monday through Friday or by email cs@wohalioutdoors.com.

Recall Details

Description:

This recall involves children's 100 percent polyester, three-piece pajama sets that include a printed long-sleeve shirt, pants and a coordinating solid color robe that has matching printed lapels and cuffs. The sets have a printed label with "BASS PRO SHOPS" on the back of the neck of the long-sleeve shirt and robe and at the back of the pants. Each of the garments also has a sewn-in side label that has "RN number 74747" printed on it, and underneath that label another sewn-in label that has PO# 3515 or 3516, a style number, and the phone number 1-800-BASS PRO. Only sleepwear in the style numbers below and with a label identifying PO# 3515 or 3516 are included in the recall.

Style

Style Description

Number

6904536

Deer Camo - pink print top and bottom; solid pink robe with pink print lapel and cuffs

6904537

Pretty Pony - pink print top and bottom; solid purple robe with pink print lapel and cuffs

6904538

Woodland Critters - white print top and bottom; solid pink (coral) robe with white print lapel and cuffs

-
- 6904539 Holiday Critters - cream print top and bottom; solid red robe with cream print lapel and cuffs
- 6904540 Deer Camo - tan print top and bottom; solid brown robe with tan print lapel and cuffs
- 6904541 Holiday Moose - gray print top and bottom; solid dark gray robe with gray print lapel and cuffs
- 6904542 Wolf - green print top and bottom; solid green robe with green print lapel and cuffs
- 6904543 Bear - gray print top and bottom; solid gray robe with gray print lapel and cuffs
-

Remedy:

Consumers should immediately take the recalled pajama sets away from children and contact Wohali for instructions on receiving a pre-paid shipping label to return the pajama sets to Wohali in exchange for a full refund in the form of a Bass Pro gift card.

Incidents/Injuries:

None reported

Sold Exclusively At:

Bass Pro Shops stores, catalog, and online at basspro.com from October 2016 through August 2017 for about \$25.

Importer(s):

Wohali Outdoors LLC, of Broken Arrow, Okla.

Manufactured In:

China

Recall number:

18-070



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Woolino Recalls Children's Pajamas Due to Violation of Federal Flammability Standard



Recalled Woolino pajama - Gray



**Name of Product:**

Children's pajamas

Hazard:

The children's pajama sets fail to meet flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

November 21, 2017

Units:

About 4,100

Consumer Contact

Woolino toll-free at 844-882-8080 from 9 a.m. to 5 p.m. ET Monday through Friday, email at contact@woolino.com or online at www.woolino.com and click on "Product Recall" at the bottom of the page for more information.

Recall Details

Description:

This recall involves children's 100 percent merino wool one-piece, long-sleeve, footed pajamas. They have a blue, gray, lilac or lilac gray horizontal stripe print and a zipper that extends from the center of the neckline down to the left ankle. The sleepwear was sold in sizes 6-12 months, 12-18 months, 18-24 months and 2T. Woolino and the size are printed on the back of the neckline.

Remedy:

Consumers should immediately take the recalled sleepwear away from children and contact Woolino for a full refund.

Incidents/Injuries:

None Reported

Sold At:

Clothes Pony and Caro Bambino stores nationwide and online at Amazon.com, Zulily.com and Woolino.com from May 2015 through November 2017 for between \$50 and \$60.

Importer(s):

Jojo Group LLC, of Rocky River, Ohio

Distributor(s):

Woolino, of Westlake, Ohio

Manufactured In:

China

Recall number:

18-042



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Youth Loungewear Pants Recalled by MandM's World Store



M&M'S Allover Boxed Candy Print Youth Loungewear Pants



**Name of Product:**

Youth Loungewear Pants

Hazard:

The youth loungewear pants fail to meet federal flammability standards for children's sleepwear, posing a risk of burn injury to children.

Remedy:

Refund

Recall Date:

March 12, 2015

Units:

About 19,000

Consumer Contact

M&M'S World at (800) 681-5187 from 9 a.m. to 5 p.m. ET Monday through Friday or online at www.mmsworld.com and click on the "Product Recall" link at the bottom of the page for more information.

Recall Details

Description:

This recall involves youth loungewear pants. The youth loungewear pants came in two prints, one with an allover boxed M&M'S® character print and the second with an allover M&M'S® candy print. Both youth loungewear pants are 100% cotton and were sold in youth sizes small through XL. The recalled garments have a label sewn inside the waistband with the product's identification number that includes the last four digits as the date of manufacture in MMY format. The recalled youth loungewear pants have identification numbers ending in 0711, 0212, 1112, 0313, 0413 or 0713.

Remedy:

Consumers should immediately take the recalled youth loungewear pants away from children, stop using them and return them to M&M'S World® for a full refund.

Incidents/Injuries:

None reported

Sold Exclusively At:

M&M'S World stores nationwide from July 2011 through November 2014 for about \$22.

Manufactured In:

China

Recall number:

15-097



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Zulily Recalls Children's Pajamas Due to Violation of Federal Flammability Standard



Pink and white pajamas



**Name of Product:**

Children's Pajamas

Hazard:

The pajamas do not meet the federal flammability standards for children's sleepwear, posing a risk of burn injuries.

Remedy:

Refund

Recall Date:

January 07, 2016

Units:

About 450

Consumer Contact

Zulily toll-free at 877-779-5615 from 6 a.m. to 8 p.m. PT Monday through Friday and from 6 a.m. to 6 p.m. PT on Saturdays, email at service@zulily.com or online at www.zulily.com and click on "Contact Us/Product Recall" for more information.

Recall Details

Description:

This recall involves six styles of Lilli Lovebird girls' two-piece, long-sleeve, striped pajama sets. The pajamas are 95 percent cotton and 5 percent elastane, and were sold in sizes 4 through 12. The long-sleeve pajama tops have a sewn-on pocket in the shape of a heart located on the center front. The pajamas came in pink and white stripes with a red heart; dark pink, gray and white strips with a pink heart; green, red and white stripes with a red heart; light purple and white stripes with a pink heart; steel gray and white stripes with a red heart; and Christmas red and white striped with a green heart.

Remedy:

Consumers should immediately take the sleepwear away from children and contact Zulily for instructions on returning the product for a full refund. Zulily is notifying consumers directly about the recall.

Incidents/Injuries:

None reported

Sold Exclusively Online:

Zulily.com from November 2015 through December 2015 for about \$25.

Distributor(s):

Zulily Inc., of Seattle

Manufactured In:

Mauritius

Recall number:

16-720



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Kidde Recalls Combination Smoke/CO Alarms Due to Alarm Failure



Front of unit, with wire connectors



Name of Product:

Combination smoke/carbon monoxide (CO) alarms

Hazard:

The **combination smoke/carbon monoxide (CO) alarm** can fail to continue to chirp when it reaches its 7-year end of life if the batteries are replaced, leading consumers to believe it is still working. This poses a risk of consumers not being alerted to a fire or CO incident in their home.

Remedy:

Replace

Recall Date:

November 10, 2016

Units:

About 3.6 million (in addition 1.5 million were sold in Canada)

Consumer Contact

Kidde toll-free at 855-239-0490 from 8 a.m. to 5 p.m. ET Monday through Friday or online at www.kidde.com and click on “Product Safety Notice” for more information.

Recall Details

In Conjunction With:



Description:

This recall involves Kidde NightHawk talking combo smoke/CO alarm with model number KN-COSM-IB and manufacture dates between June 1, 2004 and December 31, 2010. The alarms are hard-wired into a home's electric power. The unit has a compartment on the back for the installation of a replaceable 9V backup battery. The alarm is white, round and measures about 5 to 6 inches in diameter. "Kidde" is engraved on the front of the alarm. "Kidde," the model number and manufacture dates are printed on a label on the back on the alarm.

Remedy:

Consumers should immediately stop using the recalled alarms and contact Kidde directly for a free replacement alarm based on date of manufacture or a discount on a new alarm.

Incidents/Injuries:

Kidde has received eight reports of incidents with the recalled alarms. No injuries have been reported.

Sold At:

Electrical distributors and home centers nationwide and online at Amazon.com from June 2004 through December 2010 for between \$40 and \$65.

Importer(s):

Walter Kidde Portable Equipment Inc., of Mebane, N.C.

Manufactured In:

China

Recall number:

17-031

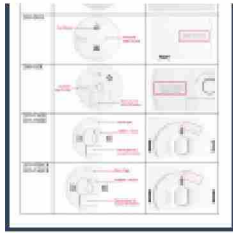


United States
**CONSUMER PRODUCT
 SAFETY COMMISSION**

Kidde Recalls TruSense Smoke and Combination Smoke/Carbon Monoxide Alarms Due to Risk of Failure to Alert Consumers to a Fire

Model	Alarm	Key Feature
2040-DSR	<p>TRUSENSE Logo Centered</p> <p>Round Button</p>	
2050-DS10	<p>Dial Button</p> <p>TRUSENSE Logo On Side</p>	
2060-ASR	<p>TRUSENSE Logo On Side</p> <p>Sliding door to access 9V battery</p>	
2070-VASR 2070-VD5R	<p>Alarm Type</p> <p>AMBER = FAULT</p> <p>Pop-up door to access 9V battery</p>	
2070-VD6CR 2070-VASCR	<p>Alarm Type</p> <p>AMBER = FAULT</p> <p>Pop-up door to access 9V battery</p>	



**Name of Product:**

Kidde TruSense Smoke Alarms and Combination Smoke/Carbon Monoxide Alarms

Hazard:

The smoke alarm and the combination smoke/carbon monoxide (CO) alarm can fail to alert consumers to a fire.

Remedy:

Replace

Recall Date:

May 06, 2021

Units:

About 226,000

Consumer Contact

Kidde toll-free at 844-796-9972 from 8 a.m. to 8 p.m. ET Monday through Friday and 9 a.m. to 3 p.m. ET on Saturday or online at www.kiddetsalarmrecall.rsvpcomm.com or www.kidde.com and click on “Support” and then “Product Alerts” for more information.

Recall Details

Description:

This recall involves Kidde TruSense Smoke Alarms and Combination Smoke/Carbon Monoxide Alarms. The recalled units are Kidde Model Series 2040, 2050, 2060 and 2070 Smoke and Combination Smoke/Carbon Monoxide alarms. Only alarms with the TruSense logo or “AMBER=FAULT” printed on the front of the alarm are included in this recall. The model number is printed on the back of the alarm.

Model	Alarm Type
2040-DSR	Smoke
2050-DS10	Smoke
2060-ASR	Smoke
2070-VDSCR	Combination Smoke/Carbon Monoxide
2070-VASCR	Combination Smoke/Carbon Monoxide
2070-VDSR	Smoke
2070-VASR	Smoke

Remedy:

Consumers should immediately contact Kidde for a free replacement alarm.

Consumers should keep using the recalled alarms until they install replacement alarms.

Incidents/Injuries:

No incidents or injuries have been reported.

Sold At:

Walmart, Home Depot, Menards and other department, home and hardware stores and electrical distributors nationwide, and online at Amazon.com, ShopKidde.com and other online retailers from May 2019 through September 2020 for between \$10 and \$70.

Importer(s):

Walter Kidde Portable Equipment Company Inc., of Mebane, N.C.

Manufactured In:

China

Recall number:

21-130



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Universal Security Instruments Recalls Combination Photoelectric Smoke & Carbon Monoxide Alarms Due to Risk of Failure to Alert Consumers to Hazardous Levels of Carbon Monoxide



Front of recalled hardwired USI Electric 2-in-1 Photoelectric Smoke & Fire + Carbon Monoxide alarm Model MPC122S with a manufacturing date code of 2017JUN02



Name of Product:

2-in-1 Photoelectric Smoke & Fire + Carbon Monoxide Alarms

Hazard:

The alarms can fail to alert consumers to the presence of a hazardous level of carbon monoxide, posing a risk of carbon monoxide poisoning or death. Carbon monoxide (CO) is an odorless, colorless, poisonous gas.

Remedy:

Replace

Recall Date:

March 31, 2022

Units:

About 8,000

Consumer Contact

Universal Security Instruments toll-free at 877-220-0046 from 9 a.m. to 5 p.m. ET, Monday through Friday, or online at <https://www.universalsecurity.com/reg-form-2022/alert/> or at www.universalsecurity.com and click on “Important Recall Information” for more information.

Recall Details

Description:

This recall involves two models and two date codes of Universal Security Instruments 2-in-1 Photoelectric Smoke & Fire + Carbon Monoxide alarms. Model MPC322S has 10-year sealed batteries and a manufacturing date code of 2017JUN09. Model MPC122S is a hardwired alarm with 10-year sealed battery backup and a manufacturing date code of 2017JUN02. The brand name “UNIVERSAL SECURITY INSTRUMENTS, INC.” or “USI ELECTRIC” is printed on the front of the alarms above “Photoelectric Smoke & Fire + Carbon Monoxide Alarm.” The model number and date code are printed on the back of the alarms.

Remedy:

Consumers should immediately contact Universal Security Instruments for a free replacement alarm. Consumers should keep using the recalled alarms until they install replacement alarms.

Incidents/Injuries:

Universal Security Instruments has received two reports of units that failed to alarm for the presence of carbon monoxide within the specified time requirement. No injuries have been reported.

Sold At:

Electrical distributors nationwide and online at Walmart.com and other websites from June 2017 through December 2019 for between \$50 and \$80.

Importer(s):

Universal Security Instruments Inc., of Owings Mills, Maryland

Manufactured In:

China

Recall number:

22-111



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

BrushX Hot Air Brushes Recalled Due to Electrocution or Shock Hazard; Imported by Ecom Brands (Recall Alert)



Recalled BrushX Styler, Dryer & Volumizer, also called the BrushX One, hot air brush in pink/black



Name of Product:

Hot Air Brushes

Hazard:

The recalled hot air brushes do not have an immersion protection device, posing an electrocution or shock hazard to the user if it falls into water when plugged in.

Remedy:

Replace

Recall Date:

February 17, 2022

Units:

About 100,000

Consumer Contact

BrushX toll-free at 855-216-3565 any time and leave a voice mail and the firm will respond, or online at www.mybrushx.com/pages/important-safety-information, or www.mybrushx.com and click on “IMPORTANT SAFETY INFORMATION” at the top of the page for more information.

Recall Details

Description:

This recall involves the BrushX Styler, Dryer & Volumizer, also called the BrushX One; and the BrushX Gen.2 hot air brushes. The brushes were sold in black and black/pink color combinations. Recalled brushes have a “not waterproof” symbol to the left of the CE mark on the rear of the brush.

Remedy:

Consumers should immediately stop using the recalled hot air brushes, destroy them by unplugging the unit and then cutting the cord, and email a photo of the destroyed product to BrushX at replacement@mybrushx.com to receive a free, upgraded replacement product. BrushX is contacting all purchasers directly.

Incidents/Injuries:

None reported

Sold At:

Online at mybrushx.com from April 2020 through August 2021 for between \$44 and \$55.

Importer(s):

Ecom Brands, dba BrushX, of France

Manufactured In:

China

Recall number:

22-725



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Hair Dryers Recalled by AG Hair



AG Hair "Sweet Heat" handheld blow dryers



Name of Product:

Sweet Heat Hair Dryers

Hazard:

The hair dryers do not have an immersion protection device, which guards against electrocution or shock if the dryer is immersed in water.

Remedy:

Refund

Recall Date:

April 21, 2015

Units:

About 3,100

Consumer Contact

AG Hair toll-free at (866) 924-4247 from 11:30 a.m. to 7 p.m. ET, Monday through Friday, by email at recall@aghair.com, or online at www.aghair.com and click on "Recall Notice" for more information.

Recall Details

Description:

This recall involves Sweet Heat handheld hair dryers. The hair dryers are white and have the words "Sweet Heat" printed in black near the blower nozzle. "AG Hair" is printed in grey and black on the back of the blower nozzle, above the handle.

Remedy:

Consumers should immediately unplug and stop using the recalled hair dryers and contact AG Hair to request a pre-paid mailing label and packaging in order to return the hair dryer for a full refund.

Incidents/Injuries:

None reported.

Sold At:

ULTA Beauty and other beauty supply stores and hair salons nationwide from May 2013 through March 2015 for about \$100.

Importer(s):

AG Professional Hair Care Products Ltd., of Burnaby, British Columbia, Canada

Manufactured In:

China

Recall number:

15-119



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

ISO Beauty Recalls Hair Dryers Due to Burn Hazard



Proliss Ionic Pro 2000W Model HD-1820



**Name of Product:**

Ionic Pro hair dryers

Hazard:

The cord can become brittle near the base of the dryer, posing burn hazards.

Remedy:

Refund

Recall Date:

February 14, 2018

Units:

About 73,000 (In addition, about 1,000 units were sold in Canada)

Consumer Contact

ISO Beauty at 800-490-5919 between 7 a.m. and 9 p.m. PT Monday through Friday or online at isobeauty.com and click on “Product Recall” for more information.

Recall Details

In Conjunction With:



Description:

This recall involves the Ionic Pro 2000 and 2000W hand-held hair dryers sold under the ISO Beauty and Proliss brand names. The bottom rear of the dryers has “ISO” or “Proliss” printed and model number HD-1820. The dryers were sold in the following colors: black, white, white pearl, peacock, white zebra, pink leopard, blue, and giraffe.

Remedy:

Consumers should immediately stop using the recalled hair dryers and contact ISO Beauty for instructions on removing the cord and receiving a refund in the form of a credit for a replacement product from the firm.

Incidents/Injuries:

ISO Beauty has received 35 reports of the dryers sparking or smoking, including two reports of flames coming from the dryers and three reported burn injuries to hands or fingers.

Sold At:

Groupon.com, Target.com, ISObeauty.com, Proliss.com and Amazon.com from March 2013 through January 2018 for between \$30 and \$40.

Importer(s):

ISO Beauty, of Chatsworth, Calif.

Manufactured In:

China

Recall number:

18-098



This recall was conducted, voluntarily by the company, under CPSC's Fast Track Recall process. Fast Track recalls are initiated by firms, who commit to work with CPSC to quickly announce the recall and remedy to protect consumers.



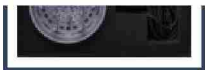
United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

LUS Recalls Hair Dryers Due to Electrocution or Shock Hazard (Recall Alert)



Recalled LUS Hair Dryer & Diffuser in Box



**Name of Product:**

LUS Hair Dryers & Diffusers

Hazard:

The hair dryers do not have an immersion protection device, posing an electrocution or shock hazard if the dryer falls into water when plugged in.

Remedy:

Refund

Recall Date:

April 23, 2020

Units:

About 2,700 (In addition, about 410 were sold in Canada)

Consumer Contact

LUS at 800-280-1675, by email at support@lusbrands.ca, or online at www.lusbrands.com and click on 'Safety and Recall Information' for more information.

Recall Details

In Conjunction With:



Description:

This recall involves the LUS Dryer & Diffuser. The handheld hair dryers were sold in white, in a box that also contains a diffuser. The hair dryers have the model number HD-LUS01 printed under the back end of the hair dryer. The logos “LUS Brands” and “Love Ur Curls” are located on either side of the back end of the dryer.

Remedy:

Consumers should immediately stop using and unplug the hair dryers. LUS is contacting all known purchasers of the hair dryers and providing a choice of either a full refund of the purchase price or a \$175 store credit.

Incidents/Injuries:

None reported

Sold At:

Online at www.lusbrands.com from November 2019 through February 2020 for between \$125 and \$144.

Importer(s):

LUS Distribution Inc., of Canada

Manufactured In:

China

Recall number:

20-738



This recall was conducted, voluntarily by the company, under CPSC's Fast Track Recall process. Fast Track recalls are initiated by firms, who commit to work with CPSC to quickly announce the recall and remedy to protect consumers.



United States
**CONSUMER PRODUCT
SAFETY COMMISSION**

Xtava Recalls Allure Hair Dryers Due to Fire, Burn and Electrical Shock Hazards



NOTE: The consumer contact information has been updated.



Allure XTV010002N, XTV010002 (White)



Name of Product:

Allure and Allure Pro hair dryers

Hazard:

The hair dryer and power cord can overheat and catch on fire, posing fire, burn and electrical shock hazards.

Remedy:

Replace

Recall Date:

August 15, 2018

Units:

About 235,000

Consumer Contact

Xtava collect at 646-491-6500 from 7 a.m. to 12 a.m. ET Monday through Friday and 10 a.m. to 5 p.m. ET on Saturdays and Sundays, email at support@xtava.com or online at www.xtava.com and click on “Product Recalls” for more information.

Recall Details

Description:

This recall involves the Allure and Allure Pro 2200W ionic ceramic hair dryers. The hand-held hair dryers are black or white and include a concentrator nozzle. The hair dryers were sold separately or as part of various hair care kits that included hair treatment products, a flat iron or a diffuser. Many of the units have a label located underneath the back of the unit bearing the following SKU numbers: XTV010001, XTV010001N, XTV010002, or XTV010002N. All units have “xtava” imprinted on the blower end of the hair dryer.

Remedy:

Consumers should immediately stop using the hair dryers and contact Xtava to receive a free replacement hair dryer.

Incidents/Injuries:

The firm has received 193 reports of the hair dryers or power cords overheating, melting, exploding or catching fire, including 18 reports of burns and two reports of a minor electrical shock. Four of the reported burn incidents resulted in a blister to the hand, wrist or finger. One consumer reported a severe burn.

Sold At:

Online at Amazon.com, eBay.com, Walmart.com, Xtava.com, Groupon.com and other websites from October 2014 through August 2018 for between \$15 and \$60 when sold separately, and for between \$20 and \$80 when sold as part of a hair care kit.

Importer(s):

Xtava LLC, of New York

Manufactured In:

China

Recall number:

18-205



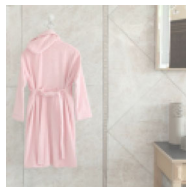
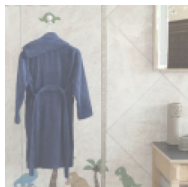
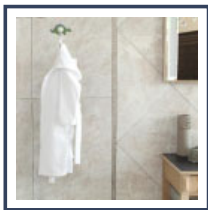
This recall was conducted, voluntarily by the company, under CPSC's Fast Track Recall process. Fast Track recalls are initiated by firms, who commit to work with CPSC to quickly announce the recall and remedy to protect consumers.



Linum Home Textiles Recalls Children's Robes Due to Violation of Federal Flammability Standards and Burn Hazard



Recalled Linum Home Textiles children's robe (white)



Name of Product:

Children's Robes

Hazard:

The children's robes fail to meet the federal flammability standards for children's sleepwear, posing a risk of burn injuries to children.

Remedy:

Refund

Recall Date:

May 05, 2022

Units:

About 44,600

Consumer Contact

Linum Home Textiles toll-free at 855-933-0300 between 10 a.m. and 5 p.m. ET Monday through Friday, by email at recall@linumhometextiles.com, online at <https://www.linumtowels.com/recalls> or <https://www.linumhometextiles.com/> and click on “IMPORTANT RECALL INFORMATION” at the top of the page for more information.

Recall Details

Description:

This recall involves children's 100 percent cotton terry robes. The long-sleeved, hooded robes have two front pockets and a sewn-in, side-seam matching belt. The robes were sold in sizes small, medium and large and in the following colors: white, navy, pink, gray and purple. "Made in Turkey," "100% Combed Turkish Cotton," the size and the washing instructions are printed on a sewn-in, side-seam label.

Remedy:

Consumers should immediately take the recalled robes away from children and contact Linum Home Textiles to receive a pre-paid mailer and instructions on how to return the robe(s) for a full refund. The firm is also contacting consumers who purchased the robes directly from Linum Home Textiles.

Incidents/Injuries:

None reported

Sold At:

Online at Amazon.com, QVC.com, Overstock.com, Groupon.com, Wayfair.com, Zulily.com, Bedbathandbeyond.com, Boscovs.com, Houzz.com, JCPenney.com, Kohls.com, Linumtowels.com and TorreyCommerce.com from July 2017 through April 2022 for between \$25 and \$40.

Importer(s):

Linum Home Textiles LLC, of Ridgefield, New Jersey

Manufactured In:

Turkey

Recall number:

22-128

Exhibit Z

COMPLAINT COUNSEL'S SUMMARY TO PROVE CONTENT OF CERTAIN CORRECTIVE ACTION MATERIALS

In the Matter of Amazon.com, CPSC Docket No. 21-2

SUMMARY OF PRODUCED MATERIALS RELATING TO PAST CHILDREN'S SLEEPWEAR RECALLS

Company¹	Bates Range	Date of Recall	Cessation of Sales	Cessation of Distribution	Notice to Supply Chain to Cease Distribution	Direct Notice to Consumers	Public Notice on CPSC.Gov	Notice on Firm Website and/or Social Media	Notice to Manufacturers, Distributors, and/or Retailers	Refund/Replacement Conditioned on Return or Destruction of Product	Monthly Progress Reports
Kids Tales	CPSC_AM0015172; CPSC_AM0016667-94	June 30, 2022	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
iMOONZZZ	CPSC_AM0015109; CPSC_AM0016703-15	June 30, 2022	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
Richie House	CPSC_AM0015300; CPSC_AM0016900-02	June 23, 2022	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
LouLou Lollipop	CPSC_AM0015176; CPSC_AM0016808-25	June 16, 2022	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No

¹ For each recall listed in the leftmost column, this summary indicates which remedies the Consumer Product Safety Commission sought from the listed firms, as reflected in the documents produced in this matter at CPSC_AM0015053-15391, CPSC_AM0015414-17019, Linum Home Textiles Recalls Children's Robes Due to Violation of Federal Flammability Standards and Burn Hazard, CPSC (May 5, 2022) <https://www.cpsc.gov/Recalls/2022/Linum-Home-Textiles-Recalls-Childrens-Robes-Due-to-Violation-of-Federal-Flammability-Standards-and-Burn-Hazard>.

COMPLAINT COUNSEL'S SUMMARY TO PROVE CONTENT OF CERTAIN CORRECTIVE ACTION MATERIALS

In the Matter of Amazon.com, CPSC Docket No. 21-2

Company¹	Bates Range	Date of Recall	Cessation of Sales	Cessation of Distribution	Notice to Supply Chain to Cease Distribution	Direct Notice to Consumers	Public Notice on CPSC.Gov	Notice on Firm Website and/or Social Media	Notice to Manufacturers, Distributors, and/or Retailers	Refund/Replacement Conditioned on Return or Destruction of Product	Monthly Progress Reports
Joey Clothing, Inc.	CPSC_AM0015220; CPSC_AM0016654-58	June 2, 2022	Yes	No	No	Yes	Yes	Yes	No	Yes	Yes
Target Corp.	CPSC_AM0015320; CPSC_AM0016889-99	June 2, 2022	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
Copper Pearl, Inc.	CPSC_AM0015181; CPSC_AM0016797-807	May 26, 2022	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
Free Birdees, LLC	CPSC_AM0015200; CPSC_AM0016729-34	May 26, 2022	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
NewCosplay	CPSC_AM0015139; CPSC_AM0016741-96	May 5, 2022	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes
Linum Home Textiles, LLC	CPSC_AM0016159-247	May 5, 2022	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
The Red League	CPSC_AM0015333; CPSC_AM0016716-28	April 21, 2022	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

COMPLAINT COUNSEL'S SUMMARY TO PROVE CONTENT OF CERTAIN CORRECTIVE ACTION MATERIALS

In the Matter of Amazon.com, CPSC Docket No. 21-2

Company¹	Bates Range	Date of Recall	Cessation of Sales	Cessation of Distribution	Notice to Supply Chain to Cease Distribution	Direct Notice to Consumers	Public Notice on CPSC.Gov	Notice on Firm Website and/or Social Media	Notice to Manufacturers, Distributors, and/or Retailers	Refund/Replacement Conditioned on Return or Destruction of Product	Monthly Progress Reports
H&M Hennes & Mauritz L.P.	CPSC_AM0015224; CPSC_AM0016660-66	February 17, 2022	No	No	No	Yes	Yes	Yes	No	Yes	Yes
Bottoms R US Inc. d/b/a Esme	CPSC_AM0015193; CPSC_AM0016588-96	February 16, 2022	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
AllMeInGeld	CPSC_AM0015088; CPSC_AM0016612-29	February 9, 2022	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
BAOPTEIL	CPSC_AM0015147; CPSC_AM0016645-53	February 2, 2022	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
AOSKERA	CPSC_AM0015092; CPSC_AM0016630-44	January 26, 2022	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Childrensalon, Ltd.	CPSC_AM0015159; CPSC_AM0016597-611	January 19, 2022	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

COMPLAINT COUNSEL'S SUMMARY TO PROVE CONTENT OF CERTAIN CORRECTIVE ACTION MATERIALS

In the Matter of Amazon.com, CPSC Docket No. 21-2

Company¹	Bates Range	Date of Recall	Cessation of Sales	Cessation of Distribution	Notice to Supply Chain to Cease Distribution	Direct Notice to Consumers	Public Notice on CPSC.Gov	Notice on Firm Website and/or Social Media	Notice to Manufacturers, Distributors, and/or Retailers	Refund/Replacement Conditioned on Return or Destruction of Product	Monthly Progress Reports
HulovoX	CPSC_AM0015134; CPSC_AM0016574-87	January 12, 2022	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Mark of Fifth Avenue	CPSC_AM0015271; CPSC_AM0016561-70	December 8, 2021	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Zoetop Business Co. Ltd.	CPSC_AM0015167; CPSC_AM0016082-104	July 29, 2021	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Tkala Fashion	CPSC_AM0015130; CPSC_AM0016545-60	July 28, 2021	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes
One Twenty Clothing Company US, LLC	CPSC_AM0015279; CPSC_AM0016330-45	July 7, 2021	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

COMPLAINT COUNSEL'S SUMMARY TO PROVE CONTENT OF CERTAIN CORRECTIVE ACTION MATERIALS

In the Matter of Amazon.com, CPSC Docket No. 21-2

Company¹	Bates Range	Date of Recall	Cessation of Sales	Cessation of Distribution	Notice to Supply Chain to Cease Distribution	Direct Notice to Consumers	Public Notice on CPSC.Gov	Notice on Firm Website and/or Social Media	Notice to Manufacturers, Distributors, and/or Retailers	Refund/Replacement Conditioned on Return or Destruction of Product	Monthly Progress Reports
Booph	CPSC_AM0015118; CPSC_AM0016248-74	June 30, 2021	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
SIORO	CPSC_AM0015151; CPSC_AM0016347-543	June 30, 2021	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Auranso Official	CPSC_AM0015113; CPSC_AM0016275-90	June 30, 2021	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
La Paloma	CPSC_AM0015249; CPSC_AM0016291-306	June 24, 2021	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes
RH US LLC	CPSC_AM0015291; CPSC_AM0016107-157	April 7, 2021	Yes	No	No	Yes	Yes	Yes	No	Yes	Yes

COMPLAINT COUNSEL'S SUMMARY TO PROVE CONTENT OF CERTAIN CORRECTIVE ACTION MATERIALS

In the Matter of Amazon.com, CPSC Docket No. 21-2

Company¹	Bates Range	Date of Recall	Cessation of Sales	Cessation of Distribution	Notice to Supply Chain to Cease Distribution	Direct Notice to Consumers	Public Notice on CPSC.Gov	Notice on Firm Website and/or Social Media	Notice to Manufacturers, Distributors, and/or Retailers	Refund/Replacement Conditioned on Return or Destruction of Product	Monthly Progress Reports
Stargate Apparel	CPSC_AM0015079; CPSC_AM0016072-79	May 20, 2020	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Joules USA, Inc.	CPSC_AM0015229; CPSC_AM0015968-87	March 5, 2020	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Ishtex Textile Products	CPSC_AM0015233; CPSC_AM0015991-6018	February 27, 2020	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes
K-Apparel	CPSC_AM0015241; CPSC_AM0016054-71	January 30, 2020	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Ragdoll & Rockets	CPSC_AM0015287; CPSC_AM0016019-43	September 10, 2019	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes
SAMpark LLC	CPSC_AM0015309; CPSC_AM0015928-42	August 20, 2019	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
H&M Hennes & Mauritz L.P.	CPSC_AM0015216; CPSC_AM0015895-920	July 25, 2019	No	No	No	Yes	Yes	Yes	No	Yes	Yes

COMPLAINT COUNSEL'S SUMMARY TO PROVE CONTENT OF CERTAIN CORRECTIVE ACTION MATERIALS

In the Matter of Amazon.com, CPSC Docket No. 21-2

Company¹	Bates Range	Date of Recall	Cessation of Sales	Cessation of Distribution	Notice to Supply Chain to Cease Distribution	Direct Notice to Consumers	Public Notice on CPSC.Gov	Notice on Firm Website and/or Social Media	Notice to Manufacturers, Distributors, and/or Retailers	Refund/Replacement Conditioned on Return or Destruction of Product	Monthly Progress Reports
The Company Store	CPSC_AM0015329; CPSC_AM0016044-52	July 3, 2019	Yes	Yes	No	Yes	Yes	Yes	No	Yes	Yes
M&A Imports Ltd., dba Just Love Fashion	CPSC_AM0015956-63	July 3, 2019	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Aegean Apparel, Inc.	CPSC_AM0015845-57	May 29, 2019	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
American Apparel	CPSC_AM0015876-77	May 28, 2019	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes
Go Couture	CPSC_AM0015834-44	April 17, 2019	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes
H&M Hennes & Mauritz L.P.	CPSC_AM0015212; CPSC_AM0015879-93	April 15, 2019	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
The Company Store	CPSC_AM0015329; CPSC_AM0015943-48	December 13, 2018	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes

COMPLAINT COUNSEL'S SUMMARY TO PROVE CONTENT OF CERTAIN CORRECTIVE ACTION MATERIALS

In the Matter of Amazon.com, CPSC Docket No. 21-2

Company¹	Bates Range	Date of Recall	Cessation of Sales	Cessation of Distribution	Notice to Supply Chain to Cease Distribution	Direct Notice to Consumers	Public Notice on CPSC.Gov	Notice on Firm Website and/or Social Media	Notice to Manufacturers, Distributors, and/or Retailers	Refund/Replacement Conditioned on Return or Destruction of Product	Monthly Progress Reports
Allura Imports	CPSC_AM0015057; CPSC_AM0015863-68	July 12, 2018	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes
Lemur Group, Inc.	CPSC_AM0015283; CPSC_AM0015869	February 28, 2018	Yes	Yes	No	No	Yes	Yes	No	Yes	No
Wohali Outdoors, LLC	CPSC_AM0015341; CPSC_AM0015820-33	December 21, 2017	No	No	Yes	Yes	Yes	No	No	Yes	Yes
One Stop Shop, LLC	CPSC_AM0015275; CPSC_AM0015656	December 8, 2017	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No
Woolino	CPSC_AM0015346; CPSC_AM0015674-96	November 21, 2017	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes
Dondolo	CPSC_AM0015185; CPSC_AM0015769-93	November 1, 2017	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes

COMPLAINT COUNSEL'S SUMMARY TO PROVE CONTENT OF CERTAIN CORRECTIVE ACTION MATERIALS

In the Matter of Amazon.com, CPSC Docket No. 21-2

Company¹	Bates Range	Date of Recall	Cessation of Sales	Cessation of Distribution	Notice to Supply Chain to Cease Distribution	Direct Notice to Consumers	Public Notice on CPSC.Gov	Notice on Firm Website and/or Social Media	Notice to Manufacturers, Distributors, and/or Retailers	Refund/Replacement Conditioned on Return or Destruction of Product	Monthly Progress Reports
Little Mass	CPSC_AM0015267; CPSC_AM0015627	November 1, 2017	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No
VIV&LUL	CPSC_AM0015337; CPSC_AM0015697-722	November 1, 2017	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
ASHERANG EL	CPSC_AM0015075; CPSC_AM0015794	September 5, 2017	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No
Richie House	CPSC_AM0015296; CPSC_AM0015739	August 3, 2017	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No
Sweet Bamboo	CPSC_AM0015316; CPSC_AM0015755	August 2, 2017	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No

COMPLAINT COUNSEL'S SUMMARY TO PROVE CONTENT OF CERTAIN CORRECTIVE ACTION MATERIALS

In the Matter of Amazon.com, CPSC Docket No. 21-2

Company¹	Bates Range	Date of Recall	Cessation of Sales	Cessation of Distribution	Notice to Supply Chain to Cease Distribution	Direct Notice to Consumers	Public Notice on CPSC.Gov	Notice on Firm Website and/or Social Media	Notice to Manufacturers, Distributors, and/or Retailers	Refund/Replacement Conditioned on Return or Destruction of Product	Monthly Progress Reports
Little Giraffe	CPSC_AM0015263	June 15, 2017	No	No	No	No	Yes	Yes	No	No	No
Kreative Kids, Inc.	CPSC_AM0015245; CPSC_AM0015723	June 1, 2017	Yes	Yes	No	Yes	Yes	Yes	Yes	No	No
LCK Design LLC d/b/a Lively Clothing	CPSC_AM0015258; CPSC_AM0015811	March 14, 2017	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No
FULLBEAU TY Brands L.P.	CPSC_AM0015204; CPSC_AM0015585	October 4, 2016	No	No	Yes	Yes	Yes	Yes	Yes	No	No
Smocked Threads by Cecil & Lou	CPSC_AM0015313; CPSC_AM0015607	July 26, 2016	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
Saro Trading Company	CPSC_AM0015096; CPSC_AM0015613	June 29, 2016	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No
Eleanor Rose	CPSC_AM0015189; CPSC_AM0015621	April 5, 2016	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
Creating X LLC	CPSC_AM0015143; CPSC_AM0015574	March 31, 2016	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No

COMPLAINT COUNSEL'S SUMMARY TO PROVE CONTENT OF CERTAIN CORRECTIVE ACTION MATERIALS

In the Matter of Amazon.com, CPSC Docket No. 21-2

Company¹	Bates Range	Date of Recall	Cessation of Sales	Cessation of Distribution	Notice to Supply Chain to Cease Distribution	Direct Notice to Consumers	Public Notice on CPSC.Gov	Notice on Firm Website and/or Social Media	Notice to Manufacturers, Distributors, and/or Retailers	Refund/Replacement Conditioned on Return or Destruction of Product	Monthly Progress Reports
Zulily Inc.	CPSC_AM0015354; CPSC_AM0015587	January 7, 2016	No	No	No	Yes	Yes	Yes	No	Yes	No
Roberta Roller Rabbit	CPSC_AM0015305; CPSC_AM0015554	April 25, 2015	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
Smooth Industries	CPSC_AM0015126; CPSC_AM0015539	April 8, 2015	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
Lands' End	CPSC_AM0015253; CPSC_AM0015478	March 27, 2015	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
M&M's World	CPSC_AM0015350; CPSC_AM0015498	March 12, 2015	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
K.J. Sportswear California	CPSC_AM0015083; CPSC_AM0015546	March 10, 2015	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
KTM North America Inc.	CPSC_AM0015122; CPSC_AM0015527	March 4, 2015	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
Lazy One	CPSC_AM0015101; CPSC_AM0015462	February 4, 2015	Yes	Yes	No	No	Yes	Yes	No	Yes	No
Star Ride Kids	CPSC_AM0015105; CPSC_AM0015440	January 8, 2015	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
TOTAL NUMBER OF RECALLS			63 of 69	61 of 69	59 of 69	66 of 69	69 of 69	68 of 69	56 of 69	48 of 69	37 of 69

COMPLAINT COUNSEL'S SUMMARY TO PROVE CONTENT OF CERTAIN CORRECTIVE ACTION MATERIALS

In the Matter of Amazon.com, CPSC Docket No. 21-2

SUMMARY OF PRODUCED MATERIALS RELATING TO PAST HAIR DRYER RECALLS

Company	Bates Range	Date of Recall	Cessation of Sales	Cessation of Distribution	Notice to Supply Chain to Cease Distribution	Direct Notice to Consumers	Public Notice on CPSC.Gov	Notice on Firm Website and/or Social Media	Notice to Manufacturers, Distributors, and/or Retailers	Refund/Replacement Conditioned on Return or Destruction of Product	Monthly Progress Reports
BrushX	CPSC_AM0015371; CPSC_AM0015410-21	February 17, 2022	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
LUS Distribution	CPSC_AM0015383; CPSC_AM0016977-99	April 23, 2020	Yes	No	Yes	Yes	Yes	Yes	No	No	Yes
Xtava	CPSC_AM0015387; CPSC_AM0016961-70	August 15, 2018	Yes	No	Yes	Yes	Yes	Yes	Yes	No	Yes
ISO Beauty, Proliss	CPSC_AM0015379; CPSC_AM0016954	February 14, 2018	Yes	No	Yes	No	Yes	Yes	Yes	Yes	No
AG Professional Hair Care Products	CPSC_AM0015375; CPSC_AM0016909-29	April 21, 2015	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
TOTAL NUMBER OF RECALLS			5 of 5	1 of 5	5 of 5	4 of 5	5 of 5	5 of 5	4 of 5	3 of 5	4 of 5

COMPLAINT COUNSEL'S SUMMARY TO PROVE CONTENT OF CERTAIN CORRECTIVE ACTION MATERIALS

In the Matter of Amazon.com, CPSC Docket No. 21-2

SUMMARY OF PRODUCED MATERIALS RELATING TO PAST CARBON MONOXIDE DETECTOR RECALLS

Company	Bates Range	Date of Recall	Cessation of Sales	Cessation of Distribution	Notice to Supply Chain to Cease Distribution	Direct Notice to Consumers	Public Notice on CPSC.Gov	Notice on Firm Website and/or Social Media	Notice to Manufacturers, Distributors, and/or Retailers	Refund/Replacement Conditioned on Return or Destruction of Product	Monthly Progress Reports
Kidde	CPSC_AM0015362; CPSC_AM0017001-19	May 6, 2021	Yes	Yes	No	No	Yes	Yes	Yes	No	Yes
Universal Security Instruments	CPSC_AM0015366; CPSC_AM0015423-38	December 31, 2019	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes
Kidde	CPSC_AM0015358; CPSC_AM0016930-53	November 10, 2016	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes
TOTAL NUMBER OF RECALLS			3 of 3	3 of 3	2 of 3	2 of 3	3 of 3	3 of 3	3 of 3	0 of 3	3 of 3

Exhibit AA
(FILED UNDER SEAL)

Exhibit BB

(FILED UNDER SEAL)

Exhibit CC
(FILED UNDER SEAL)

Exhibit DD
(FILED UNDER SEAL)

Exhibit EE

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of)
RELCO, INC., a corporation)
doing business in its)
own name and as the)
WEL-DEX WELDER MFG.)
COMPANY)
and)
The Estate of Thomas H. Doss)
(deceased))
formerly an officer of)
the corporation)

CPSC DOCKET NO. 74-4

DECISION AND ORDER

On July 17, 1974, the Commission issued a notice of enforcement pursuant to section 15, Consumer Product Safety Act (CPSA), 15 U.S.C. 2064, alleging that Relco, Inc. and its chief operating officer Thomas H. Doss had manufactured and distributed an electric arc welder which presents a substantial product hazard. The product known as the Wel-Dex Electric Arc Welder was alleged to have design and performance defects which could cause electric shock, severe skin burns or fires. The product is an inexpensive mail order item which was manufactured and distributed from 1968 through early 1975. The record indicates that approximately 124,000 units had been sold.

After a hearing, presentation of documentary evidence and stipulations, the Administrative Law Judge on April 29, 1975 issued an interim initial decision and order finding that the product produces a potentially dangerous electrical shock as well as burns and fire and thus presents a substantial product hazard within the meaning of section 15(a)(2), CPSA. Respondents were ordered to stop manufacture and distribution of the product; to give public notice of the dangers presented; and to offer replacement welders or refunds.^{1/}The order continued the proceedings for a determination of the proper amount of refunds.

Further proceedings were held on the question of the proper amount of refund. On August 11, 1975 the Administrative Law Judge issued an addendum to the interim initial decision finding the usable life of the product to be one year and ordering replacement or full refunds for welders purchased within one year of actual notice of the hazard. Enforcement Counsel filed a notice of appeal but later requested the Commission to remand the matter for further hearings on newly discovered evidence concerning an injury caused by the welder. The request was granted and further hearings were held concerning the injury. 2/

1/ Although section 15(d) CPSA, permits the election of repair of the defect, this remedy was found to be impractical

2/ On September 30, 1975, prior to the reopened hearing, respondent Thomas H. Doss died.

On April 5, 1976 the Administrative Law Judge issued and served his amended initial decision and order on reopened proceedings. This amended decision reiterates the earlier decision that the Wel-Dex Electric Arc Welder creates a substantial product hazard which could lead to electric shocks, burns and fires. Respondents were again ordered to offer replacement welders or refunds. However, as a result of evidence received at the reopened hearings, the prior decision limiting relief only to persons who purchased the welders within one year of the notice was eliminated. The new decision required refunds in accordance with a percentage schedule based on length of possession and amount of use.

No appeals of the decision were filed by any of the parties. On May 6, 1976 the Commission, noting certain ambiguities in the refund aspects of the amended initial decision, issued an order allowing the parties ten days to file comments on specific provisions. No comments were filed by the parties; however, the Commission did receive a communication from the Administrative Law Judge advising that the Commission had misinterpreted his order in certain respects.

The Commission agrees with the Administrative Law Judge that the welder in question presents a substantial product hazard within the meaning of section 15(a)(2), CPSA. The Commission is for the most part in agreement with the

Administrative Law Judge on the relief ordered. It is, however, concerned with the policy implications of various portions of the order including the refund provisions insofar as they may not require tender of the welder from persons in possession of the product and the treatment of persons not in possession of the welder.

The amended initial decision requires that persons in possession of the welder who have possessed it for more than one year from the date of notice^{3/} of the hazard to tender the welder or specific internal components to the manufacturer in order to receive a refund. In contrast, the decision provides that persons who have possessed the welder for less than one year from the date of notice are entitled to a full refund regardless of whether or not they tender the product or the internal components. The Commission believes that this approach is inconsistent with the statutory intent and on the basis of the record in this case tender should be mandatory for all persons seeking a refund who are in possession of the welder regardless of how long they may have possessed it.

Although the language of section 15(d)(3), CPSA, is silent as to any mandatory tender requirement, the legislative history clearly expresses the Congressional intent that the

^{3/} The date of notice under section 15(d)(3), (CPSA), 15 U.S.C. 2064(d)(3), is the date of public notice after hearings or the date the consumer receives actual notice of the defect, whichever occurs first.

Commission possesses the authority to specify a tender requirement where the refund option is elected. The legislative history indicates that Congress, while favoring tender, even contemplated a mandatory tender requirement in all refund situations. However, the Congress decided on a more flexible approach which allows the Commission discretion to specify such a requirement after recognizing that a product may not be in a tenderable form or that tender may present a danger to persons in the chain of recall. The pertinent legislative history states:

...the Commission is intended to have authority to specify...whether the product must be tendered....

* * *

The Committee has decided against an absolute requirement that consumers must tender products in order to be entitled to the refund in favor of this more flexible approach. The Committee was concerned that, in some instances, to require the tender of the product might unduly expose consumers and persons within the distribution chain to the hazards associated with the product. Also, the offending product may no longer be in a form which would allow its tender. See H.R. Rep. No. 92-1153, 92d Cong., 2d Sess. p. 43 (1972).

Neither of the two situations mentioned in the legislative history warranting elimination of a tender requirement appear to be applicable here. The record demonstrates that the welder or the designated components are in a

tenderable form and no danger is presented to persons in the recall channels. Given the strong Congressional intent and the obvious statutory purpose of section 15, to protect the public by encouraging removal of dangerous products from the marketplace and consumers' homes, the Commission believes that tender should be required whenever practicable and where no danger is presented in the tender process. A prime example of the danger to the public of a product which is not removed from the home was presented in this case. A defective welder which had been stored by the owner after not working properly was retrieved and caused a serious injury to a family member. As the example in this case demonstrates, a refund allowance not accompanied by a tender requirement would not advance the purposes of the legislation and might expose unwary consumers and other users to the dangers posed by the hazardous product. 4/

The Commission is also concerned with the treatment in the amended initial decision of refunds for persons no longer in possession of the welder. Under the order, persons

4/ The Commission is in agreement with the difference in refund allowed by the Administrative Law Judge based on the time of possession and the use received for persons in possession over one year. The Commission also agrees that section 15 mandates a full refund to persons in the under one year possession category.

who possessed the welder less than one year and are no longer in possession are entitled to a 100% refund upon filing a claim. No requirement is included for the claimants in this class to specify why they are not in possession; and the order, as drafted, would allow persons who sold the welder, gave it away, or disposed of it for non-safety related reasons to receive a full refund. For persons who possessed the welder for longer than one year and are no longer in possession, a 50%, second priority refund is permitted if they file an affidavit that they disposed of the product after learning, through their own inspection, or otherwise, of its dangerous characteristics.

The Commission sees no rational basis in the record for allowing one group of non-possessors to recover regardless of why they disposed of the product and to limit the other group to recovery only on the basis of disposal for safety reasons. Moreover, the Commission sees no furtherance of the statutory goals by allowing recovery to a person who has sold or disposed of the product in question for non-safety related reasons. Conversely, the Commission believes it is important that safety conscious consumers who take the initiative to protect themselves and others from a dangerous product by destroying it should not be penalized

and should be given a right of recovery. 5/ Accordingly, the Commission has amended the order to require an affidavit from all claimants not in possession. To minimize the potential abuse from false or multiple claims, the Commission has added a provision requiring proof of purchase to be submitted with the affidavit and has expanded the affidavit provisions requiring the claimants to certify that they have not sold, given away or otherwise transferred the welder to anyone. 6/

The amended initial decision provides for a scheme of priorities in the event that sufficient assets are not available to provide complete relief to persons entitled to a refund. The order provides that respondents' assets would first be used for payment for notice, then to pay refunds to consumers who tender the welder and lastly to pay refunds to persons tendering affidavits on a first-come, first-serve basis. Because the number of claims to be made is unknown, the record is unclear as to the ability of respondents to

5/ Both section 15(d)(3) and the supporting legislative history explicitly indicate that the Commission has the authority to specify the persons to whom refunds must be made as well as the necessary proof of purchase.

6/ No proof of purchase is required for claimants who tender the welder or the designated components. This allows claimants who may have obtained the welder second hand to obtain a refund. This appears to satisfy the overriding statutory purpose of removing the hazardous product from consumer use.

satisfy all claims. It appears sound to deal with the potential problem of priorities at this time so as to alert claimants of the possibility that their claims may not be satisfied and to avoid any unnecessary delay which might result if the Commission is later called upon to make a priority determination. 7/

A further provision of the amended initial order which merits consideration is the provision permitting return of the welders to Commission offices. The decision does not elaborate the reasons for including this provision in the order, but the Commission presumes that it is intended to reduce shipping costs and to provide a convenient dropping off point for consumers who may live near such offices. The decision also does not specify the mechanics for using the Commission offices, including provisions for the respondents to reclaim the products, the manner of disposal, or other disposition of welders or components which are returned. Since either the consumer who returns a welder or respondents will have a property interest in the items, the Commission believes it is essential

7/ The Commission believes it important that claimants be advised of the potential lack of assets in the notice of recall. While such a warning may deter consumers from tendering their welders or otherwise seeking refunds, such reluctance should be alleviated somewhat by amending the priorities set forth in the order to allow claimants in the tender category as well as the affidavit group to be repaid on a first-come, first-serve basis. This change should also serve as an incentive for claimants to quickly return the product.

that any order which allows the use of Commission offices must specifically deal with these problems. In the present case the Administrative Law Judge has included an innovative practical solution for reducing shipping and handling costs by allowing consumers to return certain vital components instead of the entire welder. The Commission believes that this provision will adequately reduce shipping and handling costs so as to eliminate any necessity for using the Commission offices and the multitude of problems which accompany the involvement of these offices. To enhance the utility of the component tender provision, the Commission believes that it is necessary to include detailed and illustrated instructions for dismantling the welder in the letter sent to consumers under the recall.

Although the use of Commission office facilities is not warranted in this case, the Commission believes that it can assist in the recall through its communication resources. In addition to an extensive written communications facility, the Commission maintains a toll-free "hotline" in its national headquarters which can be used to assist consumers seeking to return the product in question or otherwise filing a claim. To utilize this resource, the Commission has drafted a form public notice to be used which advises claimants to contact the Commission or the manufacturer for details

concerning the recall. In conjunction with this notice, the Commission has also ordered the parties to draft a letter to reply to inquiries which will include the necessary warning and the details of the recall. This format will serve two principal purposes. It will first provide a simple and convenient manner for claimants to obtain information concerning the recall. Secondly, it will avoid the use of a complex, confusing and possibly misleading published notice which could not include all of the necessary details. The Commission believes that it is important that the letter used to respond to inquiries be in clear, plain language. It should also include a specific disclaimer advising that the Commission assumes no responsibility for replacing the product or providing refunds. The same letter can also be sent to purchasers and dealers whose identity and addresses are ascertainable from the manufacturers records.

One final matter which the Commission has considered is the provision of the amended initial decision ordering relief against the Estate of Thomas H. Doss. The original notice of enforcement was issued against Relco, Inc. and Thomas H. Doss individually and as an officer of the corporation. The record reflects that, at the time the notice of enforcement was issued and prior thereto, Mr. Doss was the sole shareholder and chief operating officer of respondent Relco, Inc. In camera proceedings were conducted concerning,

inter alia, the financial condition of the corporation and Mr. Doss personally. Shortly after Mr. Doss's death, enforcement counsel filed a motion to amend the heading of the notice of enforcement naming the Estate of Thomas H. Doss. Counsel for respondents, although not opposing the motion insofar as it sought to reflect the death of Mr. Doss, objected to the request insofar as it sought to hold the Estate liable. Counsel for the Estate on October 14, 1975 sent a letter to the Office of the Secretary of the Commission advising of the death of Mr. Doss and seeking to extend the time to respond to an appeal to the first initial order (August 11, 1975). In the amended initial decision of April 5, 1976, the motion to amend was granted and relief was ordered jointly against the corporation and the Estate.

The Commission's review of the In camera record demonstrates a sufficient intertwinement between the personal finances of Mr. Doss and those of the corporation to render the Estate liable for the relief ordered herein. The Commission also notes that the Estate, having full notice of the proceeding, has failed to note an appeal of the amended initial decision and apparently has acquiesced in the order and will assume liability. Accordingly, the Commission will not disturb the order in this regard.

In accordance with the foregoing, the Commission has altered the amended initial order in the following manner:

- (1) to require tender from persons in possession of the welder who seek a refund;
- (2) to provide that only those claimants not in possession who disposed of the product for safety related purposes and who execute appropriate affidavits and submit proof of purchase are to be entitled to a refund; and
- (3) to clarify and amend the notice requirements and the provisions permitting returns to Commission offices.

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of)
)
RELCO, INC., a corporation)
doing business in its)
own name and as the)
WEL-DEX WELDER MFG.)
COMPANY)
)
and)
)
Estate of THOMAS H. DOSS)
(deceased))
formerly an officer of)
the corporation)
_____)

CPSC DOCKET NO. 74-

ORDER

Respondents, Relco, Inc., a corporation doing business in its own name or under any other name, its successors and assigns, and its officers, and the Estate of Thomas H. Doss, are hereby ordered as follows:

1. Respondents are to refrain from manufacturing and distributing in commerce or any manner affecting commerce, as defined in Section 3 of the Consumer Product Safety Act, 15 U.S.C. 2052, the Wel-Dex Electric Arc Welder, or any other electric welder of similar design or construction, containing any of the defects alleged to create a substantial product hazard in the Notice of Enforcement issued herein on July 17, 1974.
- 2(a) Respondents are to give the following public notice immediately upon receipt of this order in the name of Wel-Dex Welder Mfg. Co:

NOTICE TO ALL PURCHASERS AND PERSONS IN
POSSESSION OF WEL-DEX ELECTRIC ARC WELDER.

The United States Consumer Product Safety Commission has found that the Wel-Dex Electric Arc Welder presents a substantial product hazard which could cause electric shock, burns or fires. The Wel-Dex Electric Arc Welder, manufactured by Wel-Dex Welder Mfg. Co., was sold primarily by mail order from 1968 to 1974. All persons in possession of a Wel-Dex Electric Arc Welder, purchased during this period, are advised to immediately stop using the product. The manufacturer has been ordered to replace the product with a substitute whose design has been approved by the Commission or to refund the purchase price in percentages based on the period of possession and use of the product. Due to potentially limited assets, replacement or refunds may only be made on a first-come, first-serve basis. For further information, concerning the return of the product and the requirements for obtaining a refund, call or write the United States Consumer Product Safety Commission, Washington, D.C. 20207, toll free number 800-638-2666 or write Wel-Dex Welder Mfg. Co, P.O. Box 10839, Houston, Texas 77018.

(b) The aforesaid notice shall be given immediately in the following manner:

- (1) by issuing a joint press release with the Commission upon this Order being issued;
- (2) by inserting an advertisement of at least the same size and prominence in the same publications as the advertisements in which respondents offered the defective welder for sale, including: Columbia, Farmer Stockman, Complete Mens Group, Eagle Magazine, Field and Stream, Fur, Fish, Game, Mechanix World, Popular Mechanics, Popular Science, Official Detective Group, Outdoor Life, Sports Afield, Western Publications, Woodmen of the World, Workbench, Pro

gressive Farmer, Rustan's Men's Group, Adventure for Men, Real Detective, Police Detective, Men in Adventure, Science & Mechanics, and Spare Time; and

- (3) by mailing a letter identical to that required under paragraph numbered 5 herein to all known purchasers, including dealers, of the defective welder, warning them of the alleged hazards and informing them of respondents' election under this Order;
- 3(a) Respondents shall have the option to replace the welder or provide a refund in accordance with the schedule set forth hereinafter.
 - (b) If respondents elect to replace the welder, a prototype of the replacement welder unit shall be submitted with all supporting technical data, electrical drawings and component material information, to the Commission's staff to enable it to determine, before the welder is placed in the hands of consumers, that any defects have been corrected and that the replacement welder will not create a substantial product hazard.
 - (c) In the event that respondents do not elect to refund, then replacements shall be given without charge to all persons who either tender the welder or an affidavit and proof of purchase under the provisions of paragraph numbered 4 herein irrespective of the time of possession or the percentage amount of refund which would have been allowed under other provisions of this order.
 4. If respondents elect to offer refunds, said refunds shall be made according to the following schedule:
 - (a) Consumers who possessed the welder for one year or less at the time of notice under paragraph numbered 2 above or at the time of actual notice of the defect, whichever occurred first, shall upon tender of the welder receive a refund of 100% of the purchase price paid, plus shipping costs.

- (b) All consumers who tender the welder and its welding rods, either unused or partially used, shall receive a refund of 100% of the purchase price paid, plus shipping costs, regardless of the length of time they possessed the welder.
 - (c) All consumers who have possessed the welder for more than one year at the time of notice under paragraph numbered 2 above or actual notice of its hazardous nature and who tender the welder, without its welding rods, shall receive a refund of 50% of the purchase price, plus shipping costs.
 - (d) All consumers who possessed the welder for less than one year at the time of actual notice of its hazardous nature and who tender an affidavit, under oath, properly notarized, stating that they disposed of the welder after learning, through their own inspection or otherwise of its dangerous characteristics and have not sold or transferred the welder to anyone shall receive a refund of 100% of the purchase price if their claim is accompanied by a copy of a sales receipt, shipping receipt or cancelled check or money order.
 - (e) All consumers who possessed the welder for more than one year at the time of actual notice of its hazardous nature and who submit an affidavit, under oath, properly notarized, stating that they disposed of the welder after learning, through their own inspection, or otherwise of its dangerous characteristics and that they have not sold or transferred the welder to anyone, shall receive a refund of 50% of the purchase price if their claim is accompanied by a copy of a sales receipt, shipping receipt or cancelled check or money order.
5. Respondents or their attorneys together with enforcement counsel, shall immediately draft a letter designed to advise persons responding to the notice under paragraph numbered 2 herein of the dangers of the welder, the provisions of this Order and the manner and form for tendering the product or components or otherwise submitting a claim. Said letter shall include a provision that the U.S. Consumer Product Safety Commission assumes no responsibility for the refund or replacement of the subject welder. Said letter

shall contain precise illustrated instructions for dismantling the components for tender under paragraph numbered 6.

6. Respondents shall accept as tender of the welder the delivery of the asbestos sole plate of the welder with its attached resistance elements and welding rods, if the rods are available.
7. Tender of the welder or components hereunder shall be made to the respondent corporation or agents retained by respondents.
8. Respondents shall make expenditures according to the following order of priorities, in the event of limited funds:
 - (a) Letter notice to all known purchasers; magazine advertisements.
 - (b) Refunds or replacements to claimants who tender the welder or components specified in paragraph numbered 6 on a first-come, first-serve basis.
 - (c) Refunds or replacements to claimants who tender affidavits on a first-come, first-serve basis after all group (b) claims have been satisfied.
9. Respondents shall make all payments due to consumers under this order within six (6) months of the request for refund by the consumer.
10. Respondents shall file compliance reports as follows: A preliminary report of compliance must be filed within fifteen (15) days after service of this Order upon respondents, detailing fully and specifically what measures they have taken to comply with this Order. Compliance reports shall be filed every thirty (30) days thereafter, until submission of a final report, summarizing all actions taken by respondents pursuant to this Order.
10. Respondents shall notify the Commission at least thirty (30) days prior to any proposed change in the corporate respondent such as dissolution, assignment or sale resulting in the emergence of a successor corporation, the creation or dissolution of subsidiaries or any other change in the corporation which may affect compliance obligations arising out of this Order.

12. Respondents shall notify the Commission at least thirty (30) days prior to any proposed or actual distribution of the assets of the Estate of Thomas H. Doss other than routine maintenance expenses or costs.

BY THE COMMISSION

Sadye E. Dunn

SADYE E. DUNN
Secretary
Consumer Product Safety Comm

DATED: OCT 27 1976