U.S. Consumer Product Safety Commission

Requirements for Furniture Sold in the United States

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Views expressed in this presentation are those of the staff and do not necessarily represent the views of the Commission.
Implementing a first class quality system can help to ensure you meet U.S. consumer product safety requirements and make your product more competitive!
Today’s Agenda

• Overview of CPSC
• How we work with manufacturers
• Why knowing and following requirements is important
• U.S. requirements
• Resources
• U.S. Environmental Protection Agency training video
U.S. Consumer Product Safety Commission (CPSC)

- An independent federal agency
- Established May 1973
- Responsible for thousands types of consumer products
- Not responsible for food, drugs, cosmetics, medical devices, motor vehicles, pesticides and rodenticides.
How CPSC Works with Manufacturers

Develop guidance and help firms comply with the law through:

• International Program Outreach
• Domestic Manufacturer Seminars
• Participation at ICPHSO Symposiums
• Advice and guidance to trade associations and consultants
Best Manufacturing Practices

• Establish best practices now to prevent costly mistakes and more efficiently implement corrective action when needed

• Know where and how your product will be used

• Suppliers should know where and how your product will be used
Best Manufacturing Practices

• Know and understand all requirements and standards
• Design safety into product- It is your responsibility to work with designer
• Design specification may affect safety
• Control your supply chain (supply chain integrity)
HANDBOOK
FOR
MANUFACTURING SAFER
CONSUMER PRODUCTS

U.S. Consumer Product Safety Commission
July 2006

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approved by, and may not reflect the views of, the Commission.
Possible Corrective Action

• Failure to meet either a CPSC regulation or an industry consensus standard can result in a recall

• CPSC can enforce based on a hazard or based on a failure to meet the requirements of a regulation or standard
If a product does not meet the requirements of a regulation or a standard:

1. Correct Future Production/Importation
2. Stop Distribution
3. Stop Retail Sales
4. Recall/Replace/Refund/Repair
Consequences of a Recall:

- Damage to name brand
- Lost future business
- Damage to country’s reputation
- Tougher regulations/legislation
Deaths Due to Crib Structural Failures
Deaths Due to Crib Structural Failures
Drop-Side Crib Warning
May 2010

- At least 32 deaths due to drop-side failures in 9 years
- 14 additional deaths potentially due to drop-side failures
- Warns against repairing broken cribs
- Warns against using older cribs; multiple problems
- Millions of cribs recalled since 2007
Furniture Recalls 2007 - Present

![Bar chart showing furniture recalls by region from FY 07 to FY 12. The chart compares recalls in Rest of World and East Asia. Each year shows a peak in recalls, with FY 09 having the highest number.]
U.S. Consumer Product Safety Commission’s Authority

Consumer Product Safety Act (CPSA)

Federal Hazardous Substances Act (FHSA)
Violations / Prohibited Acts

The CPSA and the FHSA make it unlawful to:

- Manufacture, import or distribute any product that does not comply with a mandatory standard
- Fail to report information immediately to CPSC about a product that poses a hazard
- Fail to report choking incidents
- Fail to report civil actions
Lead in Paint
Lead in Paint on Certain Furniture Articles

• Limit 0.009% (90 ppm) lead in paint and similar surface coatings

• Applies to certain consumer furniture, but excludes appliances, such as ranges, refrigerators, clothes washers, etc.

• Exceptions: backing paint on mirrors that are part of furniture, non-children’s metal furniture

• All children’s furniture - 3rd party testing required
Lead in Components (metal, plastic, etc) of Children’s Furniture

• CPSC regulates lead in children’s products

• Lead content limits for children’s products: 100 ppm for accessible components (most products)

• Children’s furniture must be certified based on 3rd party testing for lead surface coatings and lead content
Specific Types of Furniture
CRIBS
Crib Hazards

• Falls from cribs
• Strangulation and suffocation from drop-side-related issues (hardware failure, incorrect assembly)
• Limbs caught between slats
Crib Hazards

• Inadequate wood strength
• Inadequate mattress support
• Incorrect mattress size
• Paint and coating-related issues
Cribs

The CPSC issued new regulations for full-size and non full-size baby cribs and third party-testing. The regulations were effective on June 28, 2011 for manufacturers, importers, and retailers.
CPSC Crib Regulations Cover:

- Specific dimensions
  - Interior dimensions
  - Rail height

- Spacing of crib components
  - Distance between components with and without an applied force
Crib Regulations
(continued)

– Hardware
  • Must prevent mechanical hazard
  • Requires fastener/attachment hardware locking devices

– Construction and finishing
  • Wood components
  • Prevention of fall hazards
Crib Regulations (continued)

– Assembly instructions
  • Complete
  • Easy to understand

– Identifying marks, warning statement and compliance declaration
  • Identification of the manufacturer, importer, distributor, and/or seller
  • Cautionary language

– Recordkeeping
Crib Testing
TODDLER BEDS
Toddler Bed Hazards

• Entrapment
• Broken, loose, or detached components
• Product integrity issues
  – Mattress support
• Mattress fit problems
• Paint-related issues
Toddler Beds

The CPSC recently issued new regulations for toddler beds and procedures for third-party testing. The toddler bed regulations were effective on October 20, 2011.
Toddler Bed Regulation

- References the ASTM standard F1821-09
  *Standard Consumer Safety Specification for Toddler Beds* with some changes:
  - Height requirement for guardrails
  - New performance test to address guardrail structural issues
Toddler Bed Regulation

(continued)

• New performance requirements for spindle/slat strength of guardrails, side rails, and end structures.

• Changed warning labels to address entrapment and strangulation hazards separately.
Toddler Bed Regulation

(continued)

Toddler beds that are converted from full-size cribs

- Use spindle/slat testing in full-size crib standard (16 CFR § 1219)

- Use warning required in section 8 of ASTM F1169-10 (incorporated by reference at 16 CFR § 1219)
BUNK BEDS
Bunk Beds

The Commission regulates bunk beds under “Bunk Bed Standard” and it is intended to reduce the risk of death or injury to children from entrapment.
Bunk Bed Hazards

• Entrapment

• Falls

• Product integrity issues
  – Mattress support
Bunk Beds

Guardrails

• Must have at least two upper bunk guardrails no less than 5 inches above top of mattress
• Guardrail on side next to wall must run full length to within 0.22 inches of end structure, if not attached to end structure
Bunk Beds

Guardrails

• Guardrail on side away from wall cannot have opening greater than 15 inches between it and end structures
• Wedge block must not pass through any spaces in and below guardrail
Bunk Beds

End Structures

• Top of each end must be at least 5 inches above top of mattress for at least half distance
• Wedge block must not pass through any opening in upper bunk
Bunk Beds

End Structures

• Wedge block must not pass through any opening in lower bunk unless also permits passage of 9-inch diameter sphere

• Openings that permit passage of sphere must be tested for neck entrapment
Bunk Bed Testing
Upholstered Furniture
Upholstered Furniture
(proposed regulation)

• Regulation for Flammability of Residential Upholstered Furniture

  – CPSC staff currently conducting research to validate or revise performance test methods and to respond to public comments.
Upholstered Furniture
(proposed regulation)

• Proposed regulation primarily targets the primary risk of fire associated with smoldering ignitions of upholstered furniture
  – Proposal would require that manufacturers & importers use either:
    • smolder resistant upholstery coverings
    • smolder-resistant and flame-resistant interior fire barriers
OSHA

The safety of furniture used in a workplace is regulated by the U.S. Occupational Safety and Health Administration (OSHA), even if it is the same product that might be used in a home. Accordingly, certain types of furniture, especially furniture incorporating electrical or electronic components may need to be tested and certified by an OSHA Nationally Recognized Testing Laboratory (NRTL) to meet the applicable safety test standard. For more information, go to http://www.osha.gov/dts/otpca/nrtl/
State Regulatory Authorities and Technical Regulations (Mandatory)

• In the U.S. some states have laws and regulations that are more strict than federal requirements. These laws include regulations for products, labeling, packaging, and chemical restrictions (for example flame retardant chemicals).

• Your customer (importer) should know these requirements.
Overview of the U.S. Consensus (Voluntary) Standards Process

• Our laws prefer development and use of consensus standards
• To manufacture safe products, consensus standards should be followed the same as regulations are.
Overview of the U.S. Consensus (Voluntary) Standards Process

• Primary consensus standard development coordinators for consumer products: ANSI and ASTM International.

• ASTM International develops and maintains consensus standards and test methods pertaining to furniture
Available Resources

- CPSC Website: [www.cpsc.gov](http://www.cpsc.gov)
- CPSC Regulated Products Website: [http://www.cpsc.gov/businfo/reg.html](http://www.cpsc.gov/businfo/reg.html)
Other Resources

• National Institute of Standards and Technology

• ANSI  www.ansi.org

• ASTM  www.astm.org
Presentation from the U.S. Environmental Protection Agency
Summary

Why ensure my product is safe?

- Good for business
- Only legal way to sell in the United States

How do I ensure my product is safe?

- Know and understand requirements
- Establish and implement best manufacturing practices
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