



# HP Safety Requirements for Children's Products, Toys, Child Care Articles, and Apparel in the United States of America

<b>Responsible Group</b>	PPS Operations- Social & Environmental Responsibility
<b>Document Number</b>	EX-MF895-00
<b>Revision and Date</b>	D, 09-Jul-2014
<b>Abstract</b>	This specification defines Hewlett-Packard Company's (HP's) minimum safety requirements for Children's Products, Toys, Child Care Articles, Electrically Operated Toys or Other Electrically Operated Articles Intended for Use by Children, and all Apparel sold through or distributed through Snapfish, Youneek, or HP Retail Printing Solutions partners for sale in the United States of America.
<b>Applicability</b>	<p>This specification applies to suppliers, vendors, service providers, and other partners in the United States of America who, for the purposes of the relevant regulations and this specification, are the manufacturers of Children's Products, Toys, Child Care Articles, Electrically Operated Toys or Other Electrically Operated Articles Intended for Use by Children, and Apparel sold through Snapfish, Youneek, or HP Retail Printing Solutions partners. Children's Products, Toys, Child Care Articles, Electrically Operated Toys or Other Electrically Operated Articles intended for use by Children, and Apparel are referred to in this document as <i>Covered Products</i>.</p> <p>A requirement for compliance with this document shall be included in all HP contracts for the design, manufacture, or purchase of these Covered Products,</p>
<b>Disclaimer</b>	Certain jurisdictions may require specific electrical safety certifications for electrical products. These requirements are not addressed in this specification.
<b>Status</b>	Approved

© Copyright 2013-2014 Hewlett-Packard Development Company, L.P.

**This is an uncontrolled copy when in printed form.**

This is a version of EL-MF895-00, HP Safety Requirements for Children's Products, Toys, Child Care Articles, and Apparel in the United States of America, prepared for the external portal.

## Table of Contents

- 1 Introduction
- 2 Scope
- 3 Definitions
- 4 Requirements
  - 4.1 Children's Products
  - 4.2 Toys
  - 4.3 Child Care Articles



- 4.4 Electrically Operated Toys or Other Electrically Operated Articles Intended for Use by Children
- 4.5 Apparel
- 5 Testing and Certification
- 6 References
- Revision History

## 1 Introduction

HP requires that all Children's Products, Toys, Child Care Articles, Electrically Operated Toys or Other Electrically Operated Articles Intended for Use by Children, and Apparel that are HP brand, HP owned brand, or non-HP brand products and are sold or distributed through Snapfish, Youneek, or HP Retail Printing Solutions partners meet or exceed all regulatory requirements in each country in which they will be sold, leased, or marketed. Such regulatory requirements include those enforced by the United States Consumer Product Safety Commission (CPSC) pursuant to the Consumer Product Safety Improvement Act (CPSIA), Consumer Product Safety Act, Federal Hazardous Substances Act, Flammable Fabrics Act, and their implementing regulations, as well as comparable legal requirements in other jurisdictions. This specification describes the minimum safety requirements that Manufacturers of these products in the United States of America shall satisfy.

## 2 Scope

Products covered by this document include Children's Products, Toys, Child Care Articles, Electrically Operated Toys or Other Electrically Operated Articles intended for use by Children, and all Apparel sold in the United States of America as HP brand products through Snapfish, Youneek, or HP Retail Printing Solutions partners. Children's Products, Toys, Child Care Articles, Electrically Operated Toys or Other Electrically Operated Articles intended for use by Children, and Apparel are referred to in this document as *Covered Products*.

All references to "HP brand" products in this specification mean products sold in the United States of America through Snapfish, Youneek, or HP Retail Printing Solutions partners that are HP brand products, HP owned brand products, or non-HP brand products. This document specifies HP's safety requirements for all Covered Products (including both adult- and child-sized Apparel), and all parts, materials, or components that are incorporated into these products, including any and all photographic images, licensed images, icons, designs, decorations, motifs, pictures, graphics, themes, or other content added to a product according to customer specifications.

The definitions of Children's Products, Toys, Child Care Articles, Electrically operated toys or other electrically operated articles intended for use by children, and Apparel set forth in this specification may vary from regulatory definitions as an added measure of assurance that only compliant products are sold under the HP brand.

This document is not intended to be a listing of all children's product, toy, child care article, or apparel design requirements that may be established by HP's business units or by law. The Manufacturer's compliance with this specification does not relieve or diminish the Manufacturer's obligation to comply with any other HP product specification or its obligation to comply with all applicable laws. It is the Manufacturer's obligation to identify and comply with all appropriate laws, as amended from time to time.

A requirement for compliance with this document shall be included in all HP contracts for the design, manufacture, or purchase of the Covered Products identified in this document.



### 3 Definitions

- 3.1 Apparel—Costumes or articles of clothing worn or intended to be worn by an individual, without regard to the age of the individual.
- 3.2 Child Care Articles—Consumer products designed or intended to facilitate sleep or the feeding of children age 3 and younger, or to help such children with sucking or teething.
- 3.3 Children’s Products—Consumer products designed or intended for children 12 years of age or younger.

Whether a product is “designed or intended” for children 12 years of age or younger requires consideration of the reasonably foreseeable uses and misuses of the product as well as whether the product is commonly recognized by consumers as appropriate for children 12 years of age or younger. See CPSC, *Age Determination Guidelines: Relating Children’s Ages to Toy Characteristics and Play Behavior*, September 2002.

Children’s Products include, but are not limited to: Toys (as defined in Section 3.8); Child Care Articles (as defined in Section 3.2); child-sized Apparel (as Apparel is defined in Section 3.1); Electrically Operated Toys or Other Electrically Operated Articles Intended for Use by Children (as defined in Section 3.5); children’s jewelry; and products featuring licensed images appealing to children, including but not limited to children’s cartoon characters, television or movie characters, or other images, icons, designs, decorations, motifs, pictures, graphics, themes, or other content appealing to children.

Electronic devices, including products operated by a battery, are considered Children’s Products only if they are designed and intended primarily for children 12 years of age or younger, except that all Electrically Operated Toys or Other Electrically Operated Articles Intended for Use by Children are considered Children’s Products.

- 3.4 Covered Products—Children’s Products, Toys, Child Care Articles, Electrically Operated Toys or Other Electrically Operated Articles intended for use by Children, and all Apparel.
- 3.5 Electrically Operated—Toys or Other Electrically Operated Articles Intended for Use by Children: Any toy, game, or other article designed, labeled, advertised, or otherwise intended for use by children, which is intended to be powered by electrical current from nominal 120 Volts (110-125 Volts) branch circuits.
- 3.6 Manufacturer—Any person who manufactures or imports a consumer product. For purposes of products sold through Snapfish, Youneek, or HP Retail Printing Solutions partners, the Manufacturer of an HP brand product is the person who produces the finished product, including the addition of any and all photographic images, licensed images, icons, designs, decorations, motifs, pictures, graphics, themes, or other content according to customer specifications.
- 3.7 Paint and Similar Surface Coatings—A fluid, semi-fluid, or other material, with or without a suspension of finely divided coloring matter, which changes to a solid film when a thin layer is applied to a metal, wood, stone, paper, leather, cloth, plastic, or other surface. This term does not include printing inks or those materials that actually become a part of the substrate, such as



the pigment in a plastic article, or those materials which are actually bonded to the substrate, such as by electroplating or ceramic glazing.

- 3.8 Toys—Consumer products designed or intended for a child 14 years of age or younger for use by the child when the child plays. Examples of Toys include, but are not limited to: stuffed animals; dolls; and puzzles and games with licensed images appealing to children, including but not limited to children’s cartoon characters, television or movie characters, or other images, icons, designs, decorations, motifs, pictures, graphics, themes, or other content appealing to children.
- 3.9 Wood, Paper and other Plant-based Products—Consumer products or packaging materials that contain wood material or other wild plant material.

#### **4 Requirements**

Covered Products sold as HP brand products through Snapfish, Youneek, or HP Retail Printing Solutions partners must meet the design and manufacturing requirements identified in this section and the requirements in Section 5, Testing and Certification. Covered Products must comply with all requirements in Section 4.1 plus the additional requirements in Sections 4.2, 4.3, 4.4, or 4.5 of this specification, as appropriate.

It is the Manufacturer’s obligation to identify and comply with all appropriate laws, as amended from time to time. Manufacturers should note that some states are considering restrictions on Children’s Products, Toys, and Child Care Articles for chemicals not addressed by this document, including polybrominated diphenyl ethers (PBDEs) and Bisphenol A (BPA).

#### **4.1 Children’s Products**

##### **4.1.1 Lead Content**

4.1.1.1 Children’s Products shall contain no more than the following:

- 90 parts per million (ppm) in any Paint and Similar Surface Coatings (by weight of the total nonvolatile content of the paint or the weight of the dried paint film); or
- 100 ppm lead in any accessible component part.

4.1.1.2 Children’s Products that are electronic devices, including products operated by a battery, shall not contain more than 100 ppm lead in any accessible component part except as specified in the following exemptions and alternative lead limits, in accordance with 16 C.F.R. § 1500.88:

- Lead blended into the glass of cathode ray tubes, electronic components, and fluorescent tubes.
- Lead used as an alloying element in steel. The maximum amount of lead shall be less than 0.35% by weight (3500 ppm).
- Lead used in the manufacture of aluminum. The maximum amount of lead shall be less than 0.4% by weight (4000 ppm).
- Lead used in copper-based alloys. The maximum amount of lead shall be less than 4% by weight (40,000 ppm).
- Lead used in lead-bronze bearing shells and bushings.



- Lead used in compliant pin connector systems.
- Lead used in optical and filter glass.
- Lead oxide in plasma display panels and surface conduction electron emitter displays used in structural elements; notably in the front and rear glass dielectric layer, the bus electrode, the black stripe, the address electrode, the barrier ribs, the seal frit and frit ring, as well as in print pastes.
- Lead oxide in the glass envelope of Black Light Blue lamps.
- Components that are removable or replaceable, such as battery packs and light bulbs that are inaccessible when the product is assembled in functional form.

4.1.1.3 Inaccessible component parts-- A component part of a Children's Product is not required to meet the lead limits set forth in Section 4.1.1.1 and 4.1.1.2 if the component part is not physically exposed by reason of a sealed covering or casing and does not become physically exposed through reasonably foreseeable use and abuse of the product, including swallowing, mouthing, breaking, or other children's activities, and the aging of the product, the tests for which are set forth in 16 C.F.R. § 1500.87. Paint, coatings and electroplating are not barriers that would render lead in the substrate to be inaccessible to a child.

#### 4.1.2 Phosphates

Children's Products shall not contain more than 0.1% by weight tris-(2-chloroethyl) phosphate (TCEP) or tris-(1,3-dichloro-2-propyl) phosphate (TDCPP) in any product component. Furthermore, Children's Products that are intended for use by children under three years of age shall not contain TCEP. This section may be updated in future versions of this document as States consider additional restrictions on phosphates such as TCEP, TDCPP, and tris-(1-chloro-2-propyl) phosphate (TCPP).

#### 4.1.3 Tracking Labels

Children's Products and their packaging shall bear permanent distinguishing marks that allow the Manufacturer and ultimate purchaser to ascertain the following:

- Name of the Manufacturer or HP
- Location and date of manufacture
- Other cohort information such as batch or run number

#### 4.2 Toys

Toys must meet the requirements specified for Children's Products in Section 4.1, in addition to the requirements in this Section 4.2.

##### 4.2.1 Phthalates

4.2.1.1 Plastic parts or other component parts of a Toy that could conceivably contain phthalates shall contain no more than the following:

- 1000 ppm of Di-(2-ethylhexyl) phthalate (DEHP)
- 1000 ppm of Dibutyl phthalate (DBP)
- 1000 ppm of Benzyl Butyl phthalate (BBP)



4.2.1.2 Plastic parts or other component parts of a Toy that can be placed in a child's mouth and that could conceivably contain phthalates shall, in addition to the requirements in Section 4.2.1.1, contain no more than the following:

- 1000 ppm of Diisononyl phthalate (DINP)
- 1000 ppm of Diisodecyl phthalate (DIDP)
- 1000 ppm of Di-n-octyl phthalate (DnOP)

A toy can be placed in a child's mouth if any part of the toy can actually be brought to the mouth and kept in the mouth by a child so that it can be sucked and chewed. If the product can only be licked, it is not regarded as being able to be placed in the mouth.

#### 4.2.2 Safety Requirements and Coatings

Toys shall comply with the ASTM F963 Standard Consumer Safety Specification for Toy Safety, including but not limited to the following requirement.

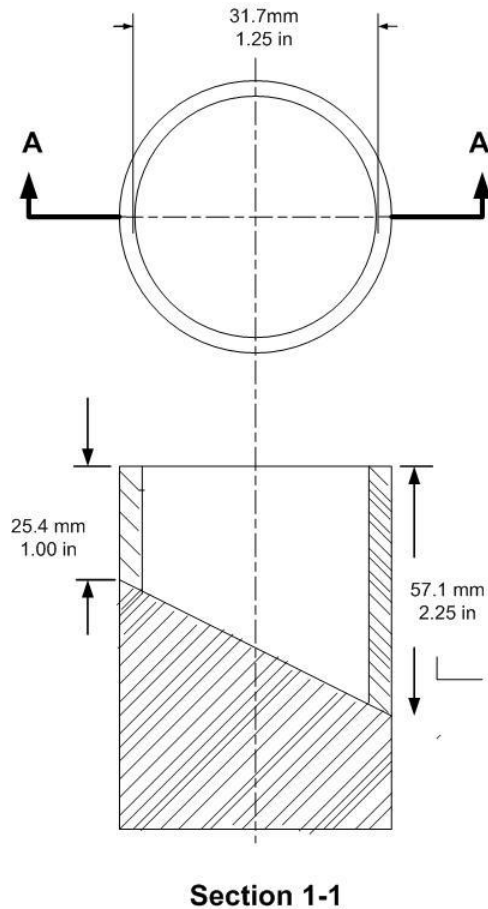
Paint and Similar Surface Coatings on Toys shall not contain the following materials in amounts above that specified below, as a measure of the weight of the total nonvolatile content of the paint or the weight of the dried paint film:

- Lead: 90 ppm
- Cadmium: 75 ppm
- Barium: 1000 ppm
- Arsenic: 25 ppm
- Antimony: 60 ppm
- Chromium: 60 ppm
- Mercury: 60 ppm
- Selenium: 500 ppm

#### 4.2.3 Small Parts – Choking Hazards

4.2.3.1 Toys intended for children 3 years of age or younger and their component parts shall not be small enough to fit entirely within the cylinder depicted as Figure 1 in 16 C.F.R. § 1501.4 in any orientation, either before or after use and abuse testing as set forth in 16 C.F.R. § 1500.51–.52 (“Small Part”).

**Figure 1: Small Parts Cylinder, identified as Figure 1 in 16 C.F.R. § 1501.4**



4.2.3.2 Toys intended for children ages 3 through 6 containing a Small Part shall bear a warning label in accordance with 16 C.F.R. § 1500.19. The Manufacturer shall inform HP in writing when a Toy requires a warning label.

### 4.3 Child Care Articles

Child Care Articles must meet the requirements specified for Children's Products in Section 4.1, in addition to the requirements in this Section 4.3.

#### 4.3.1 Phthalates

Plastic parts and other component parts of a Child Care Article that could conceivably contain phthalates shall contain no more than the following:

- 1000 ppm of Di-(2-ethylhexyl) phthalate (DEHP)
- 1000 ppm of Dibutyl phthalate (DBP)
- 1000 ppm of Benzyl Butyl phthalate (BBP)
- 1000 ppm of Diisononyl phthalate (DINP)
- 1000 ppm of Diisodecyl phthalate (DIDP)



- 1000 ppm of Di-n-octyl phthalate (DnOP)

#### **4.3.2 Small Parts – Choking Hazard**

Child Care Articles and their component parts shall not be small enough to fit entirely within the cylinder depicted as Figure 1 in 16 C.F.R. § 1501.4 in any orientation (see Figure 1, above), either before or after use and abuse testing set forth in 16 C.F.R. § 1500.51–.52.

#### **4.4 Electrically Operated Toys or Other Electrically Operated Articles Intended for Use by Children**

Electrically Operated Toys or Other Electrically Operated Articles Intended for Use by Children must meet the requirements specified for Children’s Products in Section 4.1 and shall comply with 16 C.F.R. Part 1505.

#### **4.5 Apparel**

Child-sized Apparel must meet the requirements specified for Children’s Products in Section 4.1 in addition to the requirements in this Section 4.5. Apparel that is not considered child-sized must meet the requirements in this Section 4.5.

- 4.5.1 All Apparel shall comply with the requirements set forth in the Flammable Fabrics Act and regulations setting forth flammability standards, including but not limited to 16 C.F.R. Parts 1610, 1611, 1615, and 1616.
- 4.5.2 A guarantee (either continuing or individual) shall be provided to HP in accordance with 16 C.F.R. Part 1608 guaranteeing that all Apparel, including any and all photographic images, licensed images, icons, designs, decorations, motifs, pictures, graphics, themes, or other content added to a product according to customer specifications, complies with the requirements set forth in Section 4.5.1 of this document.

### **5 Testing and Certification**

All Covered Products that are HP brand, HP owned brand, or non-HP brand products shall meet the testing and certification requirements in this specification.

- 5.1 Test results from Consumer Product Safety Commission (CPSC) accredited third-party laboratories shall be provided to HP to demonstrate compliance with all of the requirements set forth in Section 4 of this specification, except for the tracking label requirement set forth in Section 4.1.2. See the List of Accredited Testing Laboratories, published by the CPSC.
- 5.2 Notwithstanding Section 5.1, testing for the lead content limits set forth in Section 4.1.1 is not required for component parts of Children’s Products made of the materials specified in 16 C.F.R. § 1500.91, provided that these materials have neither been treated nor adulterated with the addition of materials that could result in the addition of lead into the product or material, including but not limited to the following:
- Wood.
  - Paper and similar materials made from wood or other cellulosic fiber, including, but not limited to, paperboard, linerboard and medium, and coatings on such paper which becomes part of the substrate





- CMYK process printing inks, excluding spot colors, other inks that are not used in the CMYK process, inks that do not become part of the substrate under 16 C.F.R. [Part 1303](#), and inks used in after-treatment applications, including screen prints, transfers, decals, or other prints
- Textiles, excluding after-treatment applications, including screen prints, transfers, decals, or other prints, consisting of the following:
  - Natural fibers (dyed or undyed) including, but not limited to, cotton, kapok, flax, linen, jute, ramie, hemp, kenaf, bamboo, coir, sisal, silk, wool (sheep), alpaca, llama, goat (mohair, cashmere), rabbit (angora), camel, horse, yak, vicuna, qiviut, guanaco
  - Manufactured fibers (dyed or undyed) including, but not limited to, rayon, azlon, lyocell, acetate, triacetate, rubber, polyester, olefin, nylon, acrylic, modacrylic, aramid, spandex

5.3 The Manufacturer shall comply with the certificate of compliance requirements set forth in 16 C.F.R. Part 1110 and, in addition, shall provide certificates of compliance to HP based on the test results described in Sections 5.1 and 5.2 of this document. See the sample certificate of compliance and CPSC guidance.

#### 5.4 **Wood, Paper and other Plant-based Products and Packaging**

5.4.1 Consumer products and packaging materials must not contain any wood material or other wild plant material that was illegally sourced from its country of origin. Examples of illegally sourced materials include, but are not limited to: wood or wild plant materials stolen from parks, reserves, or other protected areas; materials harvested without permission or contrary to applicable harvesting regulations; materials for which the applicable royalties, taxes or fees were not paid; and, materials exported in violation of log or other export bans. Suppliers must have a due diligence process to verify compliance of products with the material restrictions that wood and plant products are legally sourced, including obtaining the country of origin and genus and species of plant or wood material and maintaining records that verify the legal origin of plant materials used to produce products and packaging. This requirement applies to all wood materials and products thereof (including wood from planted forests) but does not apply to common food crops.

5.4.2 **Lacey Act Wood and Paper Product Import Declaration.** Certain wood materials, furniture, and other products listed by Harmonized Tariff Schedule (HTS) chapter included in the APHIS Schedule of Enforcement must include an import declaration, PPQ FORM 505: Lacey Act Plant and Plant Product Declaration Form, when entering the United States. This requirement does not apply to packaging that is directly supporting or protecting a product, such as pallets or boxes carrying a product, or sundries that accompany the product (such as warranty cards, labels, and manuals).

5.5 REACH (Registration, Evaluation, Authorisation, and Restriction of Chemicals)

All products shipped to the European Union are subject to REACH regulations. Refer to the REACH and ECHA websites in the References Section below for further details on REACH regulations. For customer inquiries on REACH compliance for the products supplied by a



Manufacturer to Snapfish and offered for sale to European customers, HP will contact the Manufacturer for assistance on responding to the inquiries.

## 6 References

The following documents are referenced in this specification. It is the Manufacturer's obligation to identify and comply with all appropriate laws, as amended from time to time.

ASTM F963, Standard Consumer Safety Specification for Toy Safety

Code of Federal Regulations Title 16, Commercial Practices

Part 1303, Ban Of Lead-Containing Paint And Certain Consumer Products Bearing Lead-Containing Paint

Part 1110, Certificates of Compliance

Part 1500, Hazardous Substances And Articles; Administration And Enforcement Regulations

- Paragraph 1500.4, Human Experience With Hazardous Substances
- Paragraph 1500.19, Misbranded toys and other articles intended for use by children
- Paragraph 1500.51, Test Methods For Simulating Use And Abuse Of Toys And Other Articles Intended For Use By Children 18 Months Of Age Or Less
- Paragraph 1500.52, Test Methods For Simulating Use And Abuse Of Toys And Other Articles Intended For Use By Children Over 18 But Not Over 36 Months Of Age
- Paragraph 1500.87, Children's Products Containing Lead: Inaccessible Component Parts
- Paragraph 1500.88, Exemptions From Lead Limits Under Section 101 Of The Consumer Product Safety Improvement Act For Certain Electronic Devices
- Paragraph 1500.91, Determinations regarding lead content for certain materials or products under section 101 of the Consumer Product Safety Improvement Act

Part 1501--Method For Identifying Toys And Other Articles Intended For Use By Children Under 3 Years Of Age Which Present Choking, Aspiration, Or Ingestion Hazards Because Of Small Parts

- Paragraph 1501.4, Size Requirements And Test Procedure

Part 1505-- Requirements For Electrically Operated Toys Or Other Electrically Operated Articles Intended For Use By Children

Part 1608--General Rules And Regulations Under The Flammable Fabrics Act

Part 1610--Standard For The Flammability Of Clothing Textiles

Part 1611--Standard For The Flammability Of Vinyl Plastic Film

Part 1615 --Standard For The Flammability Of Children's Sleepwear: Sizes 0 Through 6x (Ff 3-71)

Part 1616--Standard For The Flammability Of Children's Sleepwear: Sizes 7 Through 14 (Ff 5-74)

Part 1199--Children's Toys and Child Care Articles Containing Phthalates; Final Guidance on Inaccessible Component Parts



Consumer Product Safety Act (CPSA), [15 U.S.C. §§ 2051 - 2089](#), as amended by the CPSIA

Consumer Product Safety Commission (CPSC), [Age Determination Guidelines: Relating Children's Ages to Toy Characteristics and Play Behavior](#), September 2002

CPSC [Sample Certificate of Compliance](#)

[Consumer Product Safety Improvement Act of 2008 \(CPSIA\)](#), and information about the CPSIA including updates on CPSC guidance and regulations

Federal Hazardous Substances Act (FHSA), [15 U.S.C. §§ 1261 - 1278](#), as amended by the CPSIA

Flammable Fabrics Act (FFA), [15 U.S.C. §§ 1191 - 1204](#), as amended by the CPSIA

[Regulation No. 1907/2006 of the European Parliament and the Council Concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals \(REACH\)](#)

[ECHA – REACH Candidate List](#)

The following regulations and guidance documents are also provided. It is the Manufacturer's obligation to identify and comply with all appropriate laws, as amended from time to time.

CPSC, [Children's Products Containing Lead; Exemptions for Certain Electronic Products](#), Final Rule, January 20, 2010

CPSC, [Children's Products Containing Lead; Interpretive Rule on Inaccessible Component Parts](#), Final Rule, August 7, 2009

CPSC, [Children's Products Containing Lead; Determinations Regarding Lead Content Limits on Certain Materials or Products](#), Final Rule

CPSC, [Statement of Policy: Testing of Component Parts with Respect to Section 108 of the CPSIA](#), August 7, 2009

CPSC, Test Method: CPSC-CH-E1001-08, [Standard Operating Procedure for Determining Total Lead \(Pb\) in in Metal Children's Products \(Including Metal Jewelry\)](#)

CPSC, Test Method: CPSC-CH-E1002-08, [Standard Operating Procedure for Determining Total Lead \(Pb\) in in Non-Metal Children's Products](#)

CPSC, Test Method: CPSC-CH-E1003-09, [Standard Operating Procedure for Determining Lead \(Pb\) in Paint and Similar Surface Coatings](#)

CPSC, Test Method: CPSC-CH-C1001-09.2 - Standard [Operating Procedure for Determining Phthalates](#)

## Revision History

Revision, Date, Change Number	Brief Description of change
A, 23-Jun-2010	Initial release.



B. 23-Jun-2010 DCN 03023	Added requirement for lead content in Paint and Similar Surface Coatings in Section 4.1.1.1. Clarified requirements for Electrically Operated Toys or Other Electrically Operated Articles Intended for Use by Children and identified the term <i>Covered Products</i> . Corrected references and added capitalization for consistency.
B1, 20-Jan-2012, DCN 03108	Clerical update to change title, scope, applicability, and related text to specify this document is applicable only to the United States. Updated owner from Nathan Moin to Srinivas Adavikolanu.
C, 13-Aug-2013	Added point number 3.9.  4.1.2 Phosphates section added under Requirements.5.4 Wood paper and other Plant-based products and Packaging added under Testing and Certification.  Referenced links updated.
D, 09-Jul-2014	Updated Section 4 to note proposed State restrictions on PBDEs and BPA.  Updated Section 4.1.2 (Phosphates)