

U.S. Consumer Product Safety Commission



16 CFR Part 1633: After the Effective Date

American Home Furnishings Alliance

Flammability Workshop

Greensboro, North Carolina

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Summary of Discussion

- Background
- Implementation of the standard
- Selected problem areas observed by CPSC staff
- New materials, references, and resources
- Closing remarks

Background

- Mattress fires are one of the leading causes of fire deaths and injuries associated with consumer products
- CPSC project work began in 2000
 - ANPR: October 2001
 - NPR: December 2004
 - Final Rule: March 2006
- Standard addresses hazards associated with mattress fires

Mattresses (open-flame)

16 CFR Part 1633

- 16 CFR Part 1633: Standard for the Flammability (Open-Flame) of Mattress Sets
- Final Rule published March 15, 2006
- Effective: **JULY 1, 2007**

Mattresses with Conventional Materials

> 1,000 kW fire

at 5 minutes



Improved Mattress Performance

Peak rate of heat release after exposure to burners



Under 100 kW



Under 50 kW

Implementation of 16 CFR Part 1633

- Conducted two staff seminars for manufacturers, East and West coasts
- Held seminar for retailers
- Participated in industry sponsored meetings and seminars
- Dedicated Mattress Information Webpage
- Developed informational brochure
- Compiled *Question & Answer* document

16 CFR Part 1633: Selected Problem Areas Observed by CPSC Staff

- Scope
- Prototypes and subordinate prototypes
- Recordkeeping requirements
- Labeling requirements
- Establishment inspections

16 CFR Part 1633: Scope

- All mattress sets manufactured on or after July 1, 2007 and sold in the U.S.
- In scope
 - Mattress sets (mattress + foundation/
mattress alone)
 - Any size (e.g., Crib, Twin, Full, Queen, King)
 - Futons, multi-purpose items, mattresses in
furniture
 - Mattresses in non-motorized trailers
 - Renovated products, not sterilization

16 CFR Part 1633: Scope

- Not in scope:
 - Mattress pads
 - Water/air mattresses that do not contain filling materials between the core and ticking
 - Furniture that does not contain a mattress
 - Juvenile product pads
 - Pet beds
- Ask CPSC Staff (Office of Compliance) for guidance

Prototypes

- All items in scope must be based on a tested prototype
- Prototype is a specific mattress set design that serves as a model for production units; same with respect to materials, components, and methods of assembly
- Types of Prototypes
 - Qualified
 - Confirmed/pooled
 - Subordinate

Qualified & Confirmed Prototypes

- Qualified prototype:
 - Tested and meets the requirements
 - Requires 3 consecutive passing tests before sale
- Confirmed (pooled) prototype:
 - Same as qualified prototype with respect to materials, components, design, assembly
 - Pooled based on another manufacturer's qualified prototype
 - Requires 1 passing test

Subordinate Prototypes

- Subordinate prototype:
 - Based on qualified or confirmed prototype
 - Represented and need not be tested
 - Same except as permitted by §1633.4(b)
- §1633.4(b) permits:
 - Differences in length and width, not depth
 - Ticking changes, unless used to improve performance
 - Changes to any component, material, design, or method of assembly if it can be demonstrated on an objectively reasonable basis that the change will not cause a failure

Objectively Reasonable Basis

- Decision made by individual manufacturer based on factual information— *objectively reasonable criteria*
- Based on test data
 - Type of data
 - Amount of data
 - Quality of data
- Identical properties/specifications
- Equivalent performance
- Component performance and system interaction
- Documented and recorded in detail

Recordkeeping Requirements

- Required recordkeeping:
 - Prototype records
 - Test records (prototype, production)
 - Quality assurance records
- Prototype records:
 - Kept for life of prototype + 3 years
 - Detailed list of materials, components, assembly methods, design description
 - Identify prototypes
 - Correspond to label information

Labeling Requirements

- Requires permanent, conspicuous, and legible label in English
 - Allows alternate language on reverse
- Manufacturer name and address
- Month and year of manufacture
- Model identification
- Prototype identification number
 - Qualified, subordinate, or confirmed
 - Must correspond to records
- Certification statement
- Set information
- Bar codes/tracking information is allowed

Establishment Inspections

- Compliance Establishment Inspection
 - Typically unannounced
- Obtain information regarding:
 - Business operations and management
 - Manufacturing & production
 - Testing
 - Inventory
 - Sales & distribution
 - Recordkeeping
- Confidentiality
 - Confidential business information or trade secret shall be treated as confidential*
- After the inspection
 - Written response will be received from Office of Compliance

New Materials, References, & Resources

- 16 CFR Part 1633 Correcting Amendment
 - Edits & technical corrections
 - *Federal Register*, Vol. 73, No. 25, 6842-6843
 - February 6, 2008
- Laboratory Test Manual
- List of testing laboratories
- Website & subscriber list-serve

www.cpsc.gov/businfo/mattress


Mattress Flammability Information - Microsoft Internet Explorer provided by US CPSC

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Address <http://www.cpsc.gov/businfo/mattress.aspx> Go

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Mattress Flammability Information

Last updated February 7, 2008

The links contained on this page are to be used as a tool to help easily access an overview of mattress flammability information. Much more information and many additional links are available on the CPSC site and can be located by conducting a [search](#).

New! Join the New Mattress Information E-mail List to Receive Periodic Updates from CPSC

To subscribe to or unsubscribe from CPSC's mattress information email subscription list, enter your email address and then click "Subscribe" or "Unsubscribe". If you have a problem, please contact pmargolies@cpsc.gov for assistance.

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Standard for the Flammability of Mattresses and Mattress Pads - 16 CFR 1632

- [Regulation 1632](#)
- [Test Manual](#)
- [Regulatory Summary for Mattresses](#)
- [Interim Enforcement Policy](#)



New Standard: Standard for the Flammability (Open Flame) of Mattress Sets - 16 CFR 1633

- [Regulation 1633](#)
- **New!** Final Rule; Standard for the Flammability (Open Flame) of Mattress Sets; Correction, February 6, 2008 [\[Text\]](#) [\[PDF\]](#)
- [Interim Enforcement Policy](#)
- [Office of Compliance and Field Operations' Enforcement Guidance Concerning CPSC Mattress Set Rule for Mattress Sets that are Medical](#)

Closing Remarks

Sleep Safer

A Fire Resistant
Mattress Can
Save Your Life



U.S. CONSUMER PRODUCT SAFETY COMMISSION

For Further Information:



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