

U.S. Consumer Product Safety Commission



Toy Safety Update:

U.S. Consumer Product Safety Rules, Regulations, & Special Treatment for Small Batch Manufacturers

Presentation to attendees at the New York International Toy Fair

February 14, 2012

By Neal S. Cohen, Small Business Ombudsman

Views expressed in this presentation are those of the staff and do not necessarily represent the views of the Commission.

Today's Agenda

- Update on Consumer Product Safety Improvement Act (CPSIA) of 2008 and Public Law 112-28 (August 12, 2011)
- Toy Safety Standard & Other Children's Product Safety Rules
- Special Treatment for Small Batch Manufacturers
- CPSC Import Initiatives & Activities
- CPSC Compliance Priorities

Overview of CPSC



U.S. Consumer Product Safety Commission (CPSC)

- An independent federal agency
- Established May 1973
- Responsible for most consumer product safety functions of the U.S. federal government
- Five Commissioners, appointed by the President and confirmed by the Senate
- Relatively small, ~ 530 employees

Mission

“Protecting the public against unreasonable risks of injury from consumer products through education, safety standards activities, regulation, and enforcement.”



U.S. Consumer Product
Safety Commission

Product Safety Standards

- In general, CPSC statutes set a preference for voluntary private sector standards.
- Private sector voluntary standards are often developed with the participation of CPSC staff.

CPSC Office of Education, Global Outreach and Small Business Ombudsman

Global Outreach

Regulatory/Standards Alignment

■ Case: Pilot Alignment Initiative



Window Coverings



Booster Seats



Baby Slings



EUROPEAN COMMISSION
HEALTH AND CONSUMERS DIRECTORATE-
GENERAL



Consumer Product Safety Improvement Act (CPSIA) of 2008

Consumer Product Safety Improvement Act (CPSIA) of 2008

- “Children’s products” designed or intended primarily for children 12 years old and younger
- Key **substantive** requirements for children’s products :
 - Lead content in accessible components (100 ppm)
 - Lead in paint and surface coatings (90 ppm)
 - Phthalates (0.1% per banned phthalate) – Toys and Child Care Articles (Sleeping & Feeding) Only
 - Toy Safety Standard (ASTM F963)

- Key **process** requirements for children's products primarily intended for children 12 years old and younger:
 - Third party testing by CPSC-accepted labs
 - (Small Batch Manufacturers may not require 3PT)
 - Conformity certificates issued by importers & manufacturers (Children's Product Certificate)
 - Tracking labels
- New safety rules for durable infant products:
 - Cribs; infant walkers; bath seats; toddler beds; play yards; bed rails; additional items every six months
 - Product registration cards
- www.SaferProducts.gov – Public database

Overview of U.S. Toy Regulations

www.cpsc.gov/toysafety

Overview of U.S. Toy Regulations

- Age grading of toys
- Requirements for Toys under the Federal Hazardous Substances Act (FHSA)
- Additional requirements under the Consumer Product Safety Improvement Act (CPSIA)
- Mandatory Toy Standards
ASTM F963-2008 with toy chest provision
(previously voluntary)

Age Grading of Toys

- Age grading:
 - matches the attributes of the toy to the capabilities of the child; and
 - is used to determine the appropriate tests to which a product must comply.
- The Commission considers:
 - the manufacturer's labeling on the product, if it is reasonable;
 - whether the product is advertised, promoted, and marketed for that age child;
 - whether the product is recognized commonly by consumers as being intended for that age child; and
 - *Age Determination Guidelines* – September 2002.

Key Federal Hazardous Substance Act (FHSA) Requirements

- **Small Parts Requirements*** 16 C.F.R. Part 1501.
- **Sharp Points/
Edge Requirements** 16 C.F.R. § § 1500.48/49.
- **CSPA Labeling Requirements** 16 C.F.R. § 1500.19 and
16 C.F.R. § 1500.121.
- **Art Material Requirements** 16 C.F.R. § 1500.14(b)(8).
- **Lead-in-Paint*** 16 C.F.R. Part 1303.
- **Electrically Operated Toys/
Children's Products**** 16 C.F.R. Part 1505.

*Third party testing required

** Third party testing required except for small batch manuf. (“Group B”)

ASTM F 963-08

- Not All Sections of F963 Apply to Every Toy
- Some Sections of F963 Require Third Party Testing, Some Sections Do NOT require Third Party Testing
- Some Sections of F963 Are Covered by Existing CPSC Regulations in the CFR (Code of Federal Regulations 16 CFR Part 1000 to End)

Partial List of Requirements ASTM F963-08

- Sound-Producing Toys
- Battery-Operated Toys
- Small Objects
- Stuffed and Beanbag-type Toys
- Projections
- Marbles and Balls
- Folding Mechanisms and Hinges
- Hemispheric-Shaped Objects
- Cords and Elastics in Toys
- Yo-Yo Elastic Tether Toys
- Wheels, Tires, and Axles
- Magnets
- Pacifiers
- Balloons
- Projectile Toys
- Certain Toys with Spherical Ends
- Rattles
- Teethers and Teething Toys
- Squeeze Toys

ASTM F963-08 Sections *Testing Not Required*

- Sections that address requirements for labeling, instructional literature, or producer's markings;
- Sections that involve assessments that are conducted by the unaided eye and without any sort of tool or device.
- Sections that pertain to the manufacturing process and thus, cannot be evaluated meaningfully by a test of the finished product (e.g., the purified water provision at section 4.3.6.1); and
- Sections that address food and cosmetics;

ASTM F963-08 Sections Notice of Requirements

- Page 3 of the Notice of Requirements (“NOR”) sets forth the specific sections in ASTM F963-08 (and ASTM F963-07) that require third party testing.
- Notables sections
 - Toy Chests ASTM F963-07
 - Surface Coating Material – Soluble Test for Metals
- Toy Testing Manual (2010 Version)

ASTM F963-11 What's new?

- Heavy Metals-Limits for toy substrates
- Compositing Procedure for Total Heavy Metal Analysis
- Bath Toy Projections
- Other revisions to include: jaw entrapment; toys with spherical ends; stability of ride on toys; requirements for squeeze toys attached to rings; use of cords, straps and elastics; packaging film; and yo-yo tether balls.

When will I be required to comply with the new standard?

- CPSC has 90 days from notification (March 2012) to reject in whole or in part, the revised standard if it does not improve safety.
- The revised standard (if accepted by CPSC) will become effective 180 days from notification (June 2012).
- Commission votes **Update: On 2/15/12, the Commission approved the revised standard (F963-11) to become effective on June 12, 2012** February 15, 2012 **Update: Commission approved Wednesday,**

Banned Phthalates

Children's Toys and Child Care Articles

www.cpsc.gov/phthalates

Permanent Ban on Phthalates

Section 108 of the CPSIA

- Congress has permanently banned three types of phthalates (DEHP, DBP, BBP) in any amount greater than 0.1 percent (computed for each phthalate, individually) in (1) children's toys and (2) certain child care articles.
- A "children's toy" is defined as a consumer product designed or intended by the manufacturer for a child who is 12 years old or younger for use by the child when the child plays.
- "Child care articles" are defined as consumer products that are designed or intended by the manufacturer for a child who is 3 years old or younger, to facilitate sleeping or feeding, or to help a child who is sucking or teething.

Interim Ban on Phthalates *Section 108 of the CPSIA*

- Congress has also banned (on an interim basis) three additional types of phthalates (DINP, DIDP, DnOP) in any amount greater than 0.1 percent (computed for each phthalate individually) in (1) a children's toy **that can be placed in a child's mouth**, and (2) child care articles.
- A toy that can be placed in a child's mouth is defined as any part of a toy that actually can be brought to the child's mouth and kept there so that it can be sucked or chewed on. If a toy or a part of the toy is smaller than 5 centimeters, it can be placed in the mouth.

Bans on Phthalates

Section 108 of the CPSIA

- The ban does not apply to component parts that are inaccessible to a child.
- Applies only to plasticized component parts (or other product parts which could conceivably contain phthalates) of children's toys and child care articles and only those parts of the product should be third party tested for phthalates.
- It is not necessary to test and certify materials that are known not to contain phthalates or to certify that phthalates are absent from materials that are known not to contain phthalates.

Tracking Labels

www.cpsc.gov/trackinglabel

Tracking Labels

- Product and its packaging, if practicable
- Commission policy document sets forth the substantive requirements, including:
 - the name of the manufacturer or private labeler;
 - the location and date of production of the product;
 - detailed information on the manufacturing process, such as a batch or run number, or other identifying characteristics; and
 - any other information to facilitate ascertaining the specific source of the product.
- No mandated format. Each product type may be unique.

Third Party Testing and Certification Requirements

(Periodic Testing and Component Part
Testing)

www.cpsc.gov/3PT

What is third party testing?

- Third party testing is testing performed by an accredited laboratory that is owned by a third party (*i.e.*, not you) and is accepted by the CPSC to conduct testing on consumer products using approved test methods in accordance with established federal safety standards.
- There are three types of third party testing:
 - initial third party testing (also called certification testing);
 - material change testing; and
 - periodic testing.

Identify a CPSC-Accepted Laboratory

- All non-exempt materials must be third party tested by a CPSC-accepted laboratory, and manufacturers must issue a Children's Product Certificate.
 - Special requirements for registered small batch manufacturers. www.cpsc.gov/smallbatch
- All CPSC-accepted laboratories are accredited, but not all accredited laboratories are CPSC-accepted laboratories.
- Laboratories are accepted by the CPSC on a test-by-test basis. To lower costs, you should try to find a single laboratory that can address all of your testing needs.

Initial Testing & Certificate of Conformity

- www.cpsc.gov/labsearch
- CPSC-accepted laboratory performs applicable testing and provides you with testing results.
- You – the manufacturer or importer – are responsible for issuing a certificate of conformity based on passing results. (Children's Product Certificate).
- Laboratory may assist you, but you are the responsible party.
- www.cpsc.gov/3PT (Resources section)

Material Change Testing & Certificate of Conformity

- If you – the manufacturer or importer – make a material change to the product after initial certification, you must:
 1. Re-test the affected component part or the entire product; and
 2. Issue a new Children's Product Certificate
- www.cpsc.gov/3PT (Resources section)

Periodic Testing Rule

- Periodic Testing Rule Effective on February 8, 2013
- After initial testing and certification, periodic testing is required at a minimum of once per year, depending on your particular product.
- You can possibly increase the amount of time to once every 2 years if you have a production testing plan in place or once every 3 years with continued testing using an ISO/IEC 17025:2005-accredited lab.

Periodic Testing and Component Part Testing

- Again, currently you must third party test and certify your products (and any material changes to your products) manufactured after December 31, 2011.
 - You are not required to conduct periodic testing until February 8, 2013.
- You must retest and recertify if you've made a material change in the interim period.

Component Part Testing

- You may rely upon a Component Part Certificate or component part test results from your supplier if the supplier meets all of the requirements that are in the rule at 16 CFR 1107 (*i.e.*, uses a CPSC-accepted laboratory, keeps records, and, eventually, conducts periodic testing.)
- You must “exercise due care” to rely upon the Component Part Certificate or component part test results.

Component Part Testing

- The concept of due care is flexible, and it will vary depending upon the circumstances and the industry in question.
- A party “exercising due care” must use the degree of care that a prudent and competent person engaged in the same line of business or endeavor would exercise under similar circumstances.

Component Part Testing

- At a minimum, due care requires taking some affirmative step to ensure the validity of the test report or certification being relied upon.
- Actions taken by a certifier to ensure the reliability of test reports from a supplier may differ depending on the nature of the component part supplied, the risk of noncompliance, the industry involved, and the nature of the relationship with the supplier.

Component Part Testing

- A long-term relationship with a trusted supplier that receives a large portion of its profits from one manufacturer may not require the same level of inquiry or monitoring as that of a new supplier that provides parts to many different manufacturers infrequently.
- Depending on the industry and the facts, a certifier may take various actions in order to know something about the validity of the test reports or certifications being relied upon.

Component Part Testing

- For example, depending on the industry and the circumstances, the exercise of due care may include:
 - asking questions about testing and sampling procedures;
 - requesting written test procedures;
 - ensuring the supplier's third party conformity assessment body is CPSC-accepted;
 - spot checking a supplier's test results; or
 - visiting a supplier's factory or third party laboratory.

SMALL BATCH MANUFACTURERS

**Public Law 112-28
(August 12, 2011)**

www.cpsc.gov/smallbatch

Small Batch Manufacturer

- Public Law 112-28 (August 12, 2011)
- Commission must consider alternative testing requirements or provide exemptions for certain children's product safety rules. Small Batch Manufacturers
- October 26, 2011 Public Hearing
- Currently, no third party testing is required in the following circumstances and for the following rules:

Small Batch Manufacturer

Income

Total gross revenues from the prior calendar year (*e.g.*, calendar year 2011 sales to qualify for calendar year 2012) from the sale of all consumer products is \$1 million or less.

“Consumer products” includes both children’s products and non-children’s products even though third party testing requirements apply only to children’s products.

\$1 million or less threshold include revenues from the sale of consumer products by other businesses the registering company controls, is controlled by, or with which it is under common control.

Covered Product

A covered product means a consumer product manufactured by a small batch manufacturer where no more than 7,500 units of the same product were manufactured in the previous calendar year (*i.e.*, calendar year 2011 sales for calendar year 2012 qualification.)

Importers

Both the importer and the manufacturer of the covered product meet the revenue and unit criteria for small batch manufacturers.

Small Batch Manufacturer

Must ALWAYS third party test for the following children's product safety rules (Group A):

- ➔ • Lead-in-paint and other surface coatings, [16 CFR 1303](#);
- Full-size cribs and non-full-size cribs, [16 CFR 1219, 1220](#);
- Pacifiers, [16 CFR 1511](#);
- ➔ • Small parts for children under 3 years of age, [16 CFR 1501](#);
- Children's metal jewelry, Sec. 101(b) of the CPSIA, as amended by P.L. 112-28; 15 USC 1278a(b)(7);
- Baby bouncers, walkers, and jumpers, [16 CFR 1500.18\(a\)\(6\) and 16 CFR 1500.86\(a\)](#);
- Infant bath seats, [16 CFR 1215](#);
- Infant walkers, [16 CFR 1216](#);
- Toddler beds, [16 CFR 1217](#); and
- ➔ • Other [durable infant or toddler products, as additional children's product safety rules are enacted, 15 U.S.C. 2056a\(f\), Sec. 104 of the CPSIA.](#)

Small Batch Manufacturer

Qualifying small batch manufacturers registered with the CPSC are NOT required to third party test for the following children's product safety rules (Group B):

→ • ASTM F963-08 Toy Safety Standard;

→ • Total Lead Content in Children's Products, Sec. 101 of the CPSIA;

→ • Ban on certain phthalates in children's toys and certain child care articles, Sec. 108 of the CPSIA;

• Bicycle helmets, [16 CFR 1203](#);

• Bunk beds, [16 CFR 1213](#)/[1513](#);

• Rattles, [16 CFR 1510](#);

• Dive sticks, [16 CFR 1500.86](#);

• Bicycles, [16 CFR 1512](#);

• Carpets and rugs, [16 CFR 1630](#) and [1631](#);

• Vinyl plastic film, [16 CFR 1611](#);

→ • Wearing apparel, [16 CFR §1610](#);

• Clacker balls, [16 CFR §1500.86](#);

→ • Children's sleepwear, [16 CFR §1615](#) and [§1616](#);

• Electronically operated toys, [16 CFR §1505](#);

• ATVs, [16 C.F.R. §1420](#); and

• Mattresses, [16 CFR §1632](#).

Small Batch Manufacturer

- Remember: A manufacturer, regardless of size, must always ensure that its children's products comply with all applicable children's product safety rules.
 - A registered small batch manufacturer is relieved *only* of the requirement to *third party test* for certain safety rules but is not relieved of the requirement to manufacture children's products that comply with the applicable safety rules.

SMALL BATCH MANUFACTURERS: REGISTRATION REQUEST

Register: www.SaferProducts.gov

Tutorial Webcast: www.cpsc.gov/sbo

Frequently Asked Questions (FAQs):

www.cpsc.gov/smallbatch

Small Batch Manufacturer Registration Request: SaferProducts.gov

CPSC.gov SaferProducts.gov PoolSafely.gov Recalls.gov ATVsafety.gov

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CPSC Import Initiatives

Import Safety Working Group Strategic Framework

- Shift paradigm from border-focused intervention to *life-cycle* approach
- Emphasize *prevention* and *risk-based* approaches
- Enlist the *private sector*
- Ensure *accountability* through stronger enforcement
- Promote *cooperation* among agencies and between nations

Office of Import Surveillance and Inspection

- Co-located Compliance Investigators at Major Ports
- Cross-training technical staff; joint operations at ports /launching joint regulatory audits
- International Trade Specialists at the Commercial Targeting and Analysis Center (CTAC) – Washington D.C. **REAL TIME DATA**
- ITDS / Risk Assessment Methodology (RAM) Project
- Importer Self Assessment (ISA) - Product Safety

How will the CPSC use the ITDS / RAM?

ITDS / RAM will allow CPSC staff at the ports to have more data and technology tools for business decision-making

Processes Supported By Pilot

1. View detailed data on shipments in the past 24 hours (historical data will be maintained)
2. Evaluate risk scored entry line data to determine shipments targeted for inspection or determination of no action required
3. Conduct research and analysis on entry line data to make appropriate business decisions at the port
4. Manage port shipment data by using system provided status changes using “Actions”

Importer Self Assessment – Product Safety

Application Requirements:

- Be an active ISA participant.
- Complete an ISA-PS/CPSC Questionnaire and sign an ISA-PS/CPSC Addendum (an addendum to the ISA Memorandum of Understanding).
- Maintain an internal control system that ensures the integrity of product safety.
- Notify CBP of any major organizational changes that may impact the importer's product safety controls.
- Submit an annual written notification to CBP that acknowledges that the importer continues to meet the requirements of the ISA-PS pilot program.

Importer Self Assessment – Product Safety

ISA-PS Pilot Application Process Overview:

- CBP and CPSC staff will review and vet the application package.
- CBP and CPSC staff will perform a formal domestic site visit with the applicant.
- CBP and CPSC staff may perform a formal foreign site visit with the applicant.
- If CBP and CPSC staff finds the company ISA-PS pilot program ready, CBP and CPSC will finalize the partnership by signing the ISA-PS/CPSC Addendum.

-

Importer Self Assessment – Product Safety

Complete information available at CBP's Website:

- Begin at the Trade Programs section:

http://www.cbp.gov/xp/cgov/trade/trade_programs/

- Select “Importer Self Assessment Program”
- Select “Importer Self Assessment Consumer Product Safety Pilot”

CPSC – Consumer Product Safety Improvement Act (CPSIA)

- Prohibited Acts (15 USC 2068)
 - Import any product not in conformity with rule, standard or ban
 - Import any product subject to a voluntary corrective action taken by manufacturer, Commission has notified the public and manufacturer knew or should have known
 - Fail to furnish certificate or present false certificate of conformity
 - Unauthorized use of a safety mark
- Imported Products (15 USC 2066)
 - Product refused admission shall be destroyed unless ...
 - Upon application by importer, Secretary of the Treasury permits the export in lieu of destruction

CPSC – Import Procedures

- CPSC Sampling and Detentions
 - Specific statutory authority for sampling (15 USC 2066, 15 USC 1273)
 - Detained merchandise remains under CBP custody
- CPSC Will Issue Notices of Detention
 - Compliance Investigator or Field Investigator will issue
 - Notice will describe the suspected violation and the statute governing that suspected violation; CPSC officer contact information will be on the Notice
 - Notice issued to importer with copies to Customs broker and CBP
 - Deal directly with CPSC

CPSC – Import Procedures

- Detentions – Time Frames
 - Detention notices to be issued as soon as possible after sampling/examination
 - Recipient of Notice has 5 business days to provide information to help resolve the detention; extensions can be granted
 - Policy is to try to resolve detentions within 30 days
- Detentions of shipments under both CBP and CPSC authority
 - Detention notifications will be issued by both agencies
 - If CBP seizes that will resolve the CPSC detention but not final CPSC action (Letter of Advice could be issued)
 - If CBP resolves its detention in favor of the importer, it will not release the merchandise without resolution of the CPSC detention

CPSC – Import Procedures

- Conditional Release of Merchandise
 - CPSC can allow conditional release of merchandise under CBP bond pending results of examination and testing
 - Merchandise cannot be distributed while under conditional release
 - Case-by-case consideration
- Redelivery of Merchandise
 - Redelivery notice issued by CBP. Must be within 30 days after the end of the conditional release period
 - Redelivery could lead to seizure, destruction or exportation

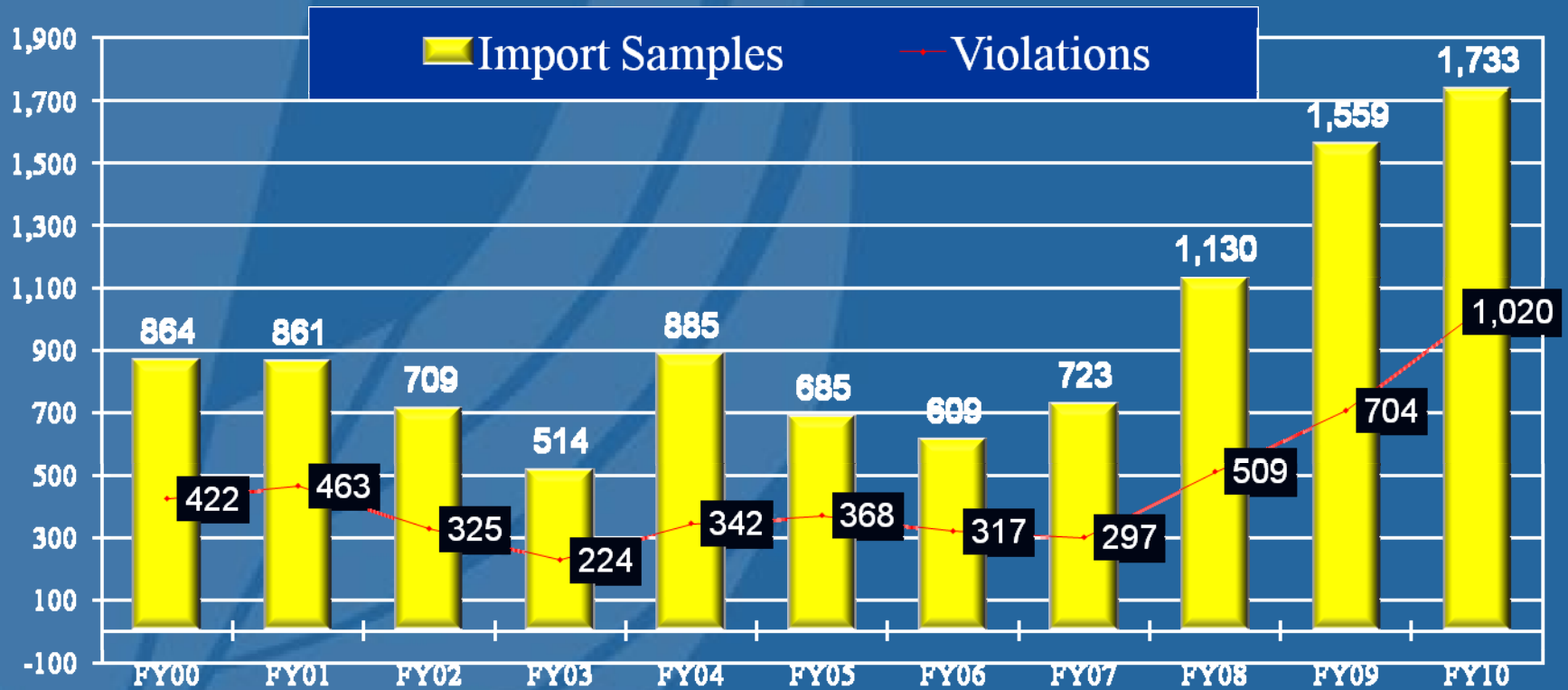
CPSC – Import Procedures

- Redelivery of Merchandise (cont'd)
 - Failure to redeliver results in assessment of liquidated damages against importer (bond principal) and surety; three times the entered value of the shipment (cannot exceed bond amount)
 - CPSC does not control the mitigation decision for liquidated damages claims (16 CFR 1500.271(b))
- Request for a Hearing
 - CPSA violations only
 - Importer/owner/consignee can seek a full hearing under the Administrative Procedures Act
 - Product will remain under Government custody at importer's expense during the pendency of the hearing
 - Custody of goods remains with CBP

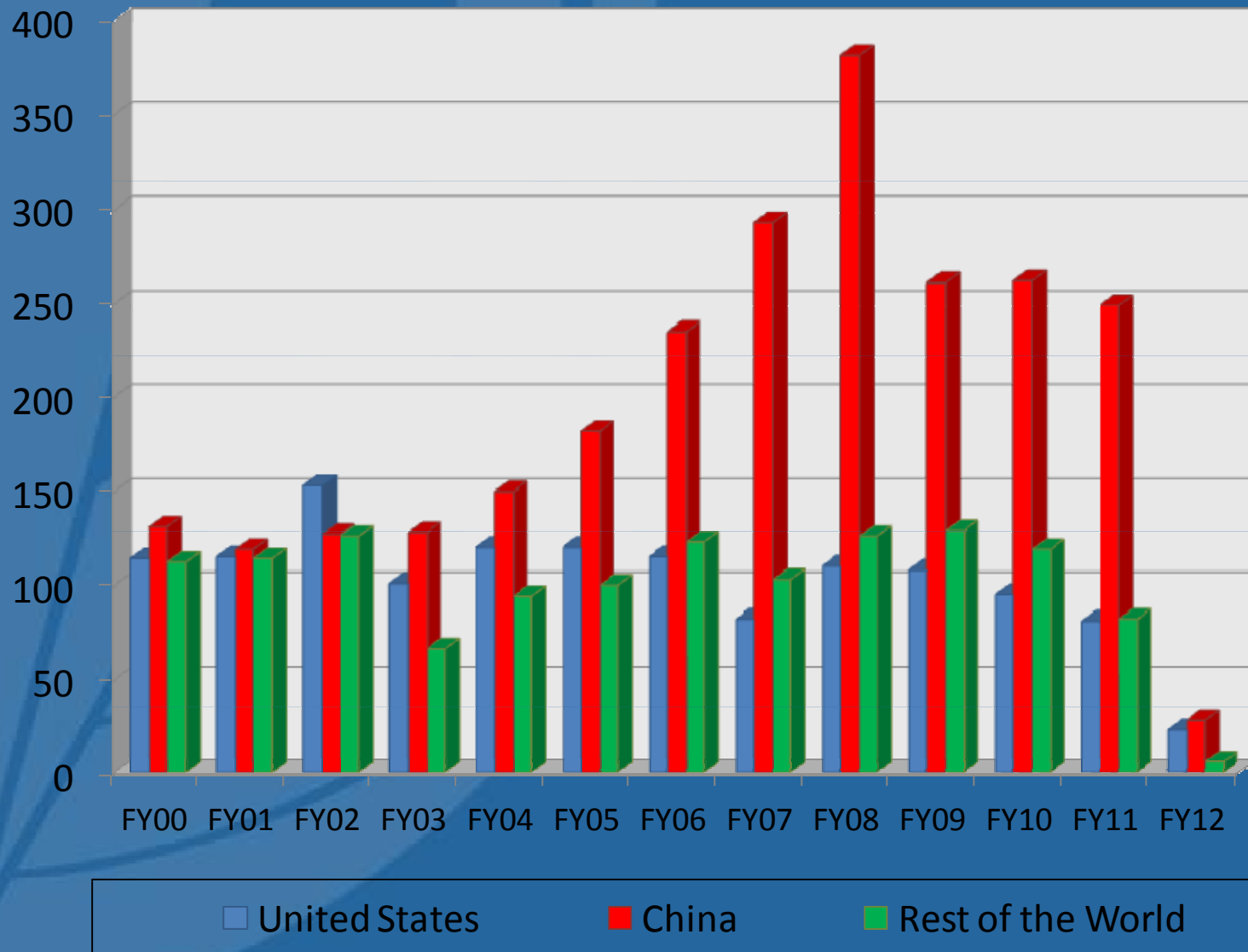
CPSC – Import Procedures

- Exportation/Destruction
 - Importer may ask to export or destroy at any time
 - Per agreement, exportation or destruction at importer's expense and must occur under Government supervision
- Seizure
 - CPSC can request CBP to seize the product under Tariff Act authority
 - If seized, then CBP takes over the process
 - Fines, Penalties and Forfeitures Office issues notices; CBP has authority to remit the forfeiture upon terms and conditions deemed appropriate
 - CPSC can suggest disposition but cannot compel it

Import Samples/Violations



Recalls by Source Country



*As of 2/2012

CPSC Recalls of Children's Products

Oct. 2010 – Mar. 2011

TYPE	NUMBER	PRIMARY HAZARD
Apparel & Footwear	19	Choking (11); Strangulation (8)
Toys	11	Choking (7); Strangulation (2); Burns (1); Laceration (1)
Cribs	9	Suffocation (9)
Strollers	5	Strangulation (4); Laceration (1)
Other	<u>21</u>	Various
TOTAL	65 recalls of children's products – of which 47 were manufactured in China.	

Type of Toy (Hazard)	2008	2009	2010
TOTAL	25	15	17
Balloons (airway obstruction, aspiration, asphyxiation)	2	2	5
Tricycles (drowning, motor vehicle involvement)	4	4	
Rubber balls/other small ball (airway obstruction, aspiration, choking, asphyxiation)	2		3
Nonmotorized riding toys/unspecified riding toys (fall, motor vehicle involvement, drowning)	4	1	
Toy boxes (asphyxiation, entrapment, drowning)	1	1	2
Nonmotorized scooters (motor vehicle involvement)	2	1	1
Stuffed toys/doll accessory (suffocation, aspiration)	1	2	1
Balls, other (motor vehicle involvement, drowning)	2		1
Powered riding toys (drowning)		2	
Other toys with a single reported fatality in the year (asphyxiation, drowning, gastroesophageal hemorrhage, toy pierced eye/brain)	7	2	4

In 2010, 65% of the reported deaths involved balloons, small balls, game, and accessory parts.

Source <http://www.cpsc.gov/library/toymemo10.pdf>

Office of Compliance & Field Operations

Enforcement of Third Party Testing,
Certification, and Tracking Labels

Resources

- www.cpsc.gov/toysafety
- www.cpsc.gov/childrensproduct
- www.cpsc.gov/labsearch
- www.cpsc.gov/3PT
- www.cpsc.gov/smallbatch
- www.cpsc.gov/lead
- www.cpsc.gov/phthalates
- Links, archived videos, and additional information available at: www.cpsc.gov/sbo

For More Information:

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