

# SPC&B Update

*December 5, 2014 - In This Issue:*

**CPSC Proposes New Phthalate Rule**

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**China Amends Labeling Requirements for Various Bags**

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## CPSC Drafts Proposed Phthalates Rule

The Consumer Product Safety Commission (CPSC) is holding a briefing today on a draft proposed rule that would increase the restrictions on phthalates in children's toys, child care articles, and other children's products. Among other things, the draft rule would:

- Continue the current permanent ban above 0.1% in all accessible toy and child care article components for DEHP, DBP, and BBP;
- Impose similar measures on DIBP, DPENP, DHEXP and DCHP;
- Make the interim ban on DINP permanent for all children's toys and childcare articles; and (currently only banned in children's toys and articles that can be placed in a child's mouth)

As previously reported, California's ban on DINP goes into effect on December 20, 2014. Since there are no safe harbor levels for DINP, it is recommended that any products containing DINP have warning labels. If the CPSC's proposed DINP ban is implemented, in all probability the federal limit of 0.1% will be accepted as a maximum limit for DINP, and labeling would not be required if the chemical is present in an amount under the limit.

## China Amends Labeling Requirements for Various Types of Bags

China has revised portions of its labeling standards for handbags, knapsacks, traveling cases and trolley bags. For both standards, China removed the requirement to clearly indicate that coated leather is "transfer coated," while maintaining the requirement to indicate that split leather is "split." The restriction on labeling a product as "leather" for products containing multiple materials, when the leather base is no more than 60% of the total thickness, is qualified so that if the surface is only finished or transfer coated (including painting), the material can now be labeled as "super-thick finished leather" or "super-thick transfer coated leather."

For further information on chemical restrictions and labeling requirements, please contact Gail T. Cumins at [gcumins@spcblaw.com](mailto:gcumins@spcblaw.com), Alli Baron at [abaron@spcblaw.com](mailto:abaron@spcblaw.com), or Donna Shira at [dshira@spcblaw.com](mailto:dshira@spcblaw.com), or call us at 212-425-0055.

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