



CPSIA Quick Facts

Small Parts Requirement (16CFR 1501)

Certification and third party testing requirements of CPSIA apply.

Purpose: to reduce choking, aspiration, and ingestion incidents.

Scope: Applies to toys and other articles intended for children **under** 3 years of age.

Exempts:

- Balloons;
- Books and other items made of paper;
- Writing materials such as crayons, chalk, pencils, and pens;
- Children's clothing and accessories;
- Grooming, feeding, and hygiene products such as diaper pins and clips, barrettes, toothbrushes, drinking glasses, dishes, and eating utensils;
- Phonograph records;
- Modeling clay and similar products;
- Finger paints, watercolors, and other paint sets;
- Rattles (16 CFR 1510)
- Pacifiers (16 CFR 1511)

Test in small parts test cylinder before and — if it passes — after age-based use and abuse testing (16 CFR 1500.51 & 1500.52)

Trickiest issue: Age grading

Age Grading Criteria:

- Manufacturer's stated intent (such as on label) if it is reasonable;
- Advertising, promotion, and marketing;
- Whether article is commonly recognized as being intended for children under 2.

Problem: No real objective measure on age grading. CPSC staff applies own judgment. Either get staff or expert opinion, or better yet, anything that is a "close call" should meet requirements for children under 3.

Further information see CPSC regulatory summary here:

<http://www.cpsc.gov/businfo/corrective.html>

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