



## ***CPSIA Tracking Labels Requirement***

As a follow up to our previous communications regarding the Consumer Product Safety Improvement Act (CPSIA) of 2008, we are writing in respect of Section 103(a) of CPSIA, requiring the manufacturer/private labeler to place a permanent, distinguishing mark on children's products and their packaging to the extent practicable to enable the manufacturer and ultimate purchaser to ascertain certain source and other product information (*such as location and date of production of the project and cohort information (including batch, run number, or other identifying characteristic)*). This marking requirement is with the primary intent of facilitating a recall of children's products in an effective manner, if necessary. The requirement goes into effect for children's products manufactured on or after August 14, 2009.

Based on guidance from the Consumer Product Safety Commission, discretion is currently being left to the manufacturer/private labeler in developing the distinguishing mark. With respect to books, such source and production information could be included on the copyright page or on the front/back cover of the book, or alternatively, we understand that many publishers are intending on including codes/contact information that will allow the consumer to ascertain the necessary information through the publisher. If the second alternative is selected, it is important that the publisher maintain adequate and reliable systems that will allow the identification of the printer and other production information.

In either case, the publisher controls the information on the copyright page and elsewhere on the book and, accordingly, will direct the placement and content of the information. Please ensure that that the information to be included appears in the files when transmitted to us to avoid any delay in production.

We recognize that most publishers already possess the ability to track products based on the information currently printed on their books and the corresponding production information retained by the publisher in the ordinary course. Accordingly, we understand that many publishers anticipate that the markings required under CPSIA can be accomplished without significant change in current processes and procedures.

We appreciate your cooperation and assistance as we work together to implement the tracking requirement. If you have any questions or need additional information please contact your sales representative.

*The information provided in this letter is based on the current state of the regulation and is subject to change, including based on further rulings and guidance from the Commission.*