

E-ssentials

Consumer Products | Technical updates essential to your operations

Electrical and Electronics

Restriction of Hazardous Substances (RoHS) Enforcement in the United Kingdom



The National Measurement Office (NMO) of United Kingdom has recently published a [report](#)¹ on its Restriction of Hazardous Substances (RoHS) enforcement project carried out on household appliances in June 2011. The scope of the project focused on large and small household appliances, which are product categories 1 and 2 covered under the RoHS Directive. The targeted products range from washing machines and freezers to electric knives, shavers and massagers.

Twenty-two companies were identified and approached with a request to provide information related to RoHS compliance, which included compliance systems that are in place, technical files and the approach route taken to

ensure that only compliant products are being placed on the market.

Of the 22 companies, 7 responded within the given 28 days. Based on the information received, the NMO determined that these companies had a low-risk of non-compliance to RoHS and therefore needed no further action. For the remaining 15 companies which did not respond in time, the following enforcement actions were carried out on 14 of them:

- One business improvement plan;
- Two warning letters;
- Non-compliant products to the value of £11,000 (approximately €13,300) were reworked;
- Non-compliant products to the value of £25,000 (approximately €30,300) were prevented from being placed on the market;
- Disposal of non-compliant products

(external power supplies);

- Seizure of approximately 30 non-compliant electrical items.

In addition, 8 of these 15 businesses requested or required site visits to get further advice, to have their documentation viewed or to receive other action or consultation.

The report concluded that larger brand household names have systems in place which allow the NMO to give them considerably lower risk scores than other less well-known products and brands. In contrast, many small importers who import products that cover all RoHS categories are less familiar with the RoHS and Batteries directives. The NMO recommended that these "multi-product category" importers receive more focus and attention in the future. ■

¹ Download the National Measurement Office (NMO) report about the market surveillance project on household appliances at <http://www.bis.gov.uk/assets/nmo/docs/rohs/reports/rohs-report-household-appliances-june-2011.pdf>

Toys & Children's Products

CPSC publishes new requirements for portable bed rails and all-terrain vehicles



When the Consumer Product Safety Improvement Act of 2008 (CPSIA) was launched, it required the Consumer Product Safety Commission (CPSC) to promulgate safety standards for durable infant or toddler products and to mandate the American National Standard ANSI/SVIA-1-2007 as the safety requirement for Four Wheel All-Terrain Vehicles (ATVs). Since then, the CPSC has been working on new safety standards and evaluating existing CPSC requirements to improve product safety in the United States for all consumer goods.

On 29 February 2012, the CPSC published its new [Safety Standard for Portable Bed Rails](#)¹. It also amended its current [safety requirements for All-Terrain Vehicles](#)². The details of the two requirements are as follows:

PORTABLE BED RAILS – 16 CFR 1224

The new Safety Standard for Portable Bed Rails will be listed in 16 CFR Part 1224. This safety standard, which will take effect on 29 August 2012, requires portable bed rails manufactured or imported on or after that date

to show compliance with ASTM F2085-12: Standard Consumer Safety Specification for Portable Bed Rails in order to be sold in the US.

In ASTM F2085-12, "portable bed rail" is defined as a "portable railing installed on the side of an adult bed and/or on the mattress surface which is intended to keep a child from falling out of bed." Bed rails made of foam or inflatable materials are also covered by this standard but would only need to comply with certain relevant provisions that apply to such bed rails.

Products that are not covered by this standard include:

- Guard rails used with crib mattresses on toddler beds;
- Side rails that connect the headboard to the footboard and may or may not have any barrier purposes;
- Conversion rails intended to convert a crib to a full-size bed; and
- Adult-size beds, where the rail is

permanently attached to the bed (i.e., bunk beds).

Hospital beds that have movable and latchable side rails are subject to regulations by the FDA and will not be covered by this CPSC safety standard.

ALL-TERRAIN VEHICLES – 16 CFR 1420

Currently, four-wheel ATVs are required to comply with American National Standard for Four-Wheel All-Terrain Vehicles - ANSI/SVIA 1-2007. This standard has been revised to ANSI/SVIA 1-2010 in late 2010. The CPSC has therefore decided to replace the old standard with the revised ANSI/SVIA 1-2010. The amendment will take effect on 30 April 2012 and will apply to ATVs manufactured or imported on or after the effective date.

Both Portable Bed Rails and All-Terrain Vehicles are subject to the CPSC's third party testing requirement. The CPSC will soon publish its accreditation requirement and limited acceptance criteria for third party laboratories to test according to new Portable Bed Rails standard and the revised ANSI/SVIA standard. ■

¹ Download the Final Rule for Safety Standard for Portable Bed Rails from <http://www.gpo.gov/fdsys/pkg/FR-2012-02-29/pdf/2012-4451.pdf>

² Download revised standard for All-Terrain Vehicles from <http://www.gpo.gov/fdsys/pkg/FR-2012-02-29/pdf/2012-4385.pdf>

Softlines, Hardlines, Electrical and Electronics, Toys & Children's Products

ECHA announces public consultation on Chromium VI in leather articles



On 16 March 2012, the European Chemicals Agency (ECHA) launched a six-month [public consultation](#) on the restriction proposal for Chromium VI compounds in leather articles¹. The consultation will be completed on 16 September 2012. However, the ECHA encourages interested parties to give their comments by 1 June 2012 in order to facilitate

¹ See the official ECHA press release at http://echa.europa.eu/en/web/guest/view-article/-/journal_content/a19f3846-4158-4351-8304-39de35c35f1b

the detailed discussions by the ECHA Committees on this proposal.

The proposed restriction aims to ban leather articles which have direct and prolonged or repetitive contact with the skin. Articles containing Chromium VI compounds in concentrations equal to or greater than 3 mg/kg cannot be placed on the EU market. The concentration limit is based on the detection limit of the testing method in the EN ISO 17075:2007 standard, which is also proposed to be used for the purpose of checking compliance.

Chromium compounds are widely used as tanning agents for leather because they are the most efficient and cost effective, and chrome-tanned leather is often soft with good thermal and dimensional stability. Although Chromium VI compounds are not intentionally added during tanning processes, some of the Chromium III compounds that are used as tanning agents can, under certain conditions, form Chromium VI compounds. As Chromium VI compounds are well-known allergens that can cause skin sensitisation and dermatitis at very low concentrations, the presence of Chromium VI in leather products has been a safety

Table A: Examples of leather articles within scope

Product type	
Footwear	Trousers
Gloves	Hats
Underwear	Auto seats
Watch straps and other wrist straps, bands, braces	Other furniture
Neck straps	Bags
Covers for car steering wheels	Toys
Jackets and coats	Riding gear
Trousers	Dog leashes

concern in the EU that led to the [proposal](#) of this restriction in order to protect consumers from the hazards².

Since this restriction proposal focuses on the protection of consumers against the exposure of Chromium VI in leather articles, the scope is limited to leather goods or parts that come into direct and prolonged or repetitive contact with the skin. Examples of such leather goods that are within the scope are listed in Table A. ■

² See the Chromium VI proposal by Denmark at http://echa.europa.eu/documents/10162/17233/restriction_report_cr_vi_en.pdf or download a summary from http://echa.europa.eu/documents/10162/13641/information_note_cr_vi_en.pdf

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