When is a Children’s Product Certificate (CPC) Required for an Ordinary Book or an Ordinary Paper-Based Item?

1. Item intended for Children 12 or younger?
   - No → No further Action required.
   - Yes →

2. Item is an “ordinary paper-based print material”?
   - Yes →
   - No →

3. Book has predominantly “inherent play value” OR is intended for Children 3 or under?
   - Yes →
   - No →

4. Book is an “ordinary book”?
   - Yes →
   - No →

No 3rd party testing or CPC required, but compliance with lead limit still applies. Tracking Label required.

3rd party testing and CPC required except when made solely of exempt materials. Tracking Label Required.

No 3rd party testing or CPC required, but compliance with lead limit still applies. Tracking Label required.

Must have 3rd party testing of non-exempt accessible components and CPC required. Tracking Label Required.
Definitions:

*Predominant Inherent Play Value* – a book that, by its design or components, is intended to be interactive in the same manner as a toy.

*Ordinary Book* – The term ‘ordinary book’ means a book printed on paper or cardboard, printed with inks or toners, and ‘bound and finished using a conventional method,’ and that is intended to be read or has educational value. Such term does not include books with predominant inherent play value, books designed or intended for a child 3 years of age or younger, and does not include any toy or other article that is not a book that is sold or packaged with an ordinary book. In addition, the term ‘ordinary book’ does not include books that contain components that are printed on material other than paper or cardboard or contain non-paper based components such as metal or plastic parts or accessories that are not part of the ‘binding and finishing materials used in a conventional method.’

*Ordinary Paper-Based Printed Material* – The term ‘ordinary paper based materials’ means materials printed on paper or cardboard, such as magazines, posters, greeting cards, and similar products, that are printed with inks or toners and ‘bound and finished using a conventional method.’ Such terms do not include printed materials that contain components that are printed on material other than paper or cardboard or contain non-paper based components such as metal or plastic parts or accessories that are not part of the ‘binding and finishing materials used in a conventional method.’

*Binding and Finishing in a conventional Manner* – The manufacturing process that occurs after printing with a press has been performed on a substrate such as paper or cardboard with finishing typically being performed prior to binding. Binding involves the joining of assembled sheets into a final product and finishing imparts special features both of which are accomplished through a variety of methods and techniques. Binding methods involve mechanical and/or adhesive techniques and include, but are not limited to, sewing with thread, perfect binding with adhesives, coated or uncoated plastic and metal coil/spiral binding, saddle-stitching, spine-see, and drilling for individual or three-ring loose leaf applications. Finishing methods involve mechanical and other treatments and include, but are not limited to cutting, folding, trimming, drilling, rounding corners, die cutting, embossing, debossing, guilding and/or staining, glittering, coatings, laminating, numbering, addressing, and foil stamping.

Accessible components – A component is accessible if it is not enclosed in a sealed covering and is exposed through reasonably foreseeable use or abuse. The types of use and abuse that are reasonably foreseeable include swallowing, mouthing, breaking and aging. Use and abuse tests and accessibility probes are used to determine whether a part is accessible or inaccessible. Paint, coatings or electroplating do not provide barriers that would result in a part being inaccessible.