U.S. Consumer Product Safety Commission
Log of Meeting

Subject: ASTM F15.24 Children's Jewelry Meeting

Date of Meeting: August 12, 2010

Log Entry Source: Jason Howe

Date of Log Entry: August 19, 2010

Location: CPSC Headquarters, Bethesda, MD

CPSC Attendees:

Joel Recht, LSC
Joanna Matheson, HS
Kris Hatlelid, HS
Jason Howe, LSC
Sharon White, ESHF
Hyun Kim, GCRA
Vince Amodeo, ESME
Alex Filip, EXPA
Sandra Inkster, HS
John Boja, CRE

Non-CPSC Attendees:

Sarah Sheffield, Health Canada
Carol Pollack, Independent Safety Consulting
Sanjeev Gandhi, SGS Consumer Testing Services
Fred Mills-Winkler, SGS Consumer Testing Services
Paul Giampavolo, ASTM F15 Exec & Safe-Strap
Rick Rosati, Bureau Veritas Consumer Products Services Division
Meg Hughes, Bureau Veritas Consumer Products Services Division
Tina Goerss, TUV Rheinland of North America
Daniel Phillips, Mintz, Levin
Peggy Fowler, Walmart
Pratik Ichhaporia, Intertek
Andrew Farhat, Intertek
Andrew Loveland, Consumer Testing Laboratories, Inc.
Jim Heagney, FJATA
Fred Ty, Walt Disney Company
Brent Cleaveland, FJATA
Michael Gale, FJATA
Doug Meunier, FAF Inc.

Anthony DeGeorge, FAF Inc.
Rebecca Orand, Claire's Stores
Sara Beach, Hannover Accessories
Sheila Millar, Keller and Heckman LLP
Dominick Bitume, Walt Disney Company
Doug Boehm, Bureau Veritas Consumer Products Services Division
Alan Kaufman, Toys "R" Us
Susan DeRagon, Specialized Technology Resources
Linda Root, Specialized Technology Resources
Joan Lawrence, Toy Industry Association, Inc.
Lisa Clerici, Bureau Veritas Consumer Products Services Division
Dave Dart, Bureau Veritas Consumer Products Services Division
Ali Roberts, Insight Laboratories
Mark Smith, Consumer Testing Laboratories, Inc.
Krista Travisano, Toys "R" Us
Sinclair Kenney, Uncas Mfg. Co.
Frank Gibbs, Mattel

Summary:

The meeting was called to order at 10:03 am by Michael Gale (FJATA). Mr. Len Morrissey of ASTM provided a brief overview of the ASTM organization and voting procedures. The ASTM F15.24 sub-committee (consisting of representative from manufacturers, retailers, test laboratories, regulators, and consumers) is currently working on a voluntary safety standard for children's jewelry. Participants were provided with Discussion Draft (version 6) either prior to or at the start of the meeting.

Discussions by Task Group:

Scope of Standard:

Many issues were raised and discussed regarding scope and definitions. These included, but were not limited to, the following points.

The draft standard includes an exemption for "toy jewelry." This is a term not well-defined or understood and will require additional discussion. Several points were raised in the Definitions section, including; what is a jewelry item, how Body Piercing Jewelry is defined and what it includes (clarify body piercing components versus decorative jewelry components), and what constitutes Children's Jewelry. One suggestion addressed whether the Hazardous Magnet definitions should be by reference to the ASTM F963 toy safety standard that already addresses such products.

The example of a plain bobby pin and its classification provided for a lengthy discussion and lead to the decision that the definition of "hair accessory" needs elaboration. Similarly, the example of a Halloween type costume that includes jewelry items needs to

be addressed. Definitions related to magnets intended to bridge skin also require additional discussion; bridging magnets should not be allowed, include ingestion issues, and mirror ASTM F963 use and abuse requirements.

The final Scope task group section in the discussion draft concerned Age Labeling. CPSC staff disagreed with text stating the CPSC age determination guidelines do not apply to children's jewelry. The age determination and labeling section will be discussed further in the task group and will consider the following: simplifying the decision tree, dealing with children's fine jewelry as well as inexpensive and play jewelry, adult collectible jewelry with a seemingly youthful motif, and clear indicators that show a jewelry item is intended for children (such as being sized for kids, labeled for kids, or a sales point intended for kids such as a vending machine).

Chemical Issues and Sensitization:

The Specifications for Lead in Children's Jewelry section was taken directly from existing legislation and there was no lengthy discussion. One small note was the need to update the CPSC methods references, which are incorrect in the discussion draft.

Similarly, the section on Specifications for Children's Body-Piercing Jewelry received little comment. One suggestion was made that a clarification sentence should be made stressing that the actual metal/plastic component for piercing the body part would have decorative bits, and these decorative bits that do not pierce the body (but are attached to the piece piercing the body) are still subject to other requirements.

The section on the Specifications for Antimony, Arsenic, Barium, Cadmium, Chromium, Mercury, and Selenium in Paint and Surface Coatings and Substrate Materials of Children's Jewelry raised two main points. First, these seven elements are already regulated for paint and surface coatings in ASTM F963, which could be simply referenced here.

The second issue raised is that with respect to elements in the substrate of the children's jewelry item. The referenced methodology from ASTM F963 / EN71-3 (i.e. the two hour extraction test) may not be appropriate for objects, such as small jewelry items, that may be swallowed by a child. The ASTM F963 methods address a different exposure scenario involving ingestion of very small amounts of toy over time, while swallowing jewelry would be a single, possible exposure to a much larger object. Because a swallowed jewelry object might remain in the digestive tract of a child for many hours or days, CPSC staff suggested a different, longer test would be necessary.

Another issue was raised in that a limit could be set for the total content of a chemical in the product, in addition to, or in place of soluble/extractable limit. Task group discussion on this topic will follow.

Mechanical Issues:

Due to time limitations, the mechanical issues were not extensively discussed. Discussion will continue in subsequent task group meetings. Topics of interest include magnets, strangling or entrapment that could be handled with breakaway requirements, perhaps such as those related to the loops and cords of window blinds. Some issues could be handled by reference to ASTM F963.

New Business

Earring backings that penetrate the skin of the ear are another potential concern that this standard might address. Potential solutions include a stop on the post, the post length, or disks in conjunction with the backing.

Jewelry containing liquids could be addressed with the requirements in ASTM F963; a reference to that standard could be included in the jewelry standard.

Dermal exposure to chemicals is generally not as significant an issue as exposure by ingestion. For the dermal sensitization issue, perhaps some additional sensitization information (other than for nickel sensitization that is already being addressed) would be useful.

Assignments and Next Steps:

The Scope of Standard task group will continue to address issues raised concerning definitions.

The Chemical and Sensitization task group will review industry testing results, due to be completed within a few weeks. Of interest is data on total chemical element content and soluble/extractable amounts for different materials and products.

The Mechanical task group will review incident data related to entanglement and earring backing injuries. The window blind cord data and standards may help in the development of necklace or similar chain breakaway requirements. A mechanical task group conference call was mentioned as likely for August 24th.