

## Christian Liberty Press

A Ministry of the Church of Christian Liberty

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Dear CLP Customer:

A number of you have contacted us regarding the new Consumer Product Safety Improvement Act (CPSIA). We have developed this letter to inform you about Christian Liberty Press's response to the standards established by the CPSIA.

Last year, Congress passed the CPSIA to "... establish consumer product safety standards and other safety requirements for children's products...." Book publishers are affected because of the requirement that the U.S. Consumer Product Safety Commission (CPSC) has set for lead content in toys and products designed for children under twelve years of age.

The U.S. Consumer Product Safety Commission provided the following information about the CPSIA (Release #09-086, January 8, 2009):

In February 2009, new requirements of the Consumer Product Safety Improvement Act (CPSIA) take effect. Manufacturers, importers, and retailers are expected to comply with the new Congressionally-mandated laws. Beginning February 10, 2009, children's products cannot be sold if they contain more than 600 parts per million (ppm) total lead. Certain children's products manufactured on or after February 10, 2009 cannot be sold if they contain more than 0.1% of certain specific phthalates or if they fail to meet new mandatory standards for toys.

Under the new law, children's products with more than 600 ppm total lead cannot lawfully be sold in the United States on or after February 10, 2009, even if they were manufactured before that date. The total lead limit drops to 300 ppm on August 14, 2009.

The new law requires that *domestic manufacturers and importers certify that children's products made after February 10* meet all the new safety standards and the lead ban (emphasis added). Sellers of used children's products, such as thrift stores and consignment stores, are not required to certify that those products meet the new lead limits, phthalates standard or new toy standards.

This law applies to children's products—including books—manufactured or imported on or after February 10, 2009. Most recently, however, the CPSC granted a one-year stay of testing and certification (Release #09-115, January 30, 2009) for a variety of children's products. This stay of testing and certification applies to the publication of books, including those published by Christian Liberty Press.

In spite of this stay, Christian Liberty Press will continue to work with our printers to ensure that we produce safe products that will meet the standards of the CPSC once the stay is over. We have already contacted our printers, and they have assured us that they meet or exceed the new CPSC guidelines.

As you may be aware, Christian Liberty Press produces many of the ancillary materials that are available for use with the course materials we publish or resell. We copy such items in-house on a Canon Image Runner 110 (iR 110). The toner used with the iR 110 copier is a styrene acrylate copolymer, which is non-toxic; the Material Safety Data Sheets (MSDS) from the manufactures (HP, Kyocera, NexPress Solutions, etc.) of the toner have no warnings concerning this copolymer. Nevertheless, we are pursuing more information from Canon about our in-house printing so that we can provide you with the appropriate information for your records.

Most of these items are to be used by or are under the control of educators. This includes teacher materials (i.e., answer keys and teacher's manuals) and test packets. Since parents and teachers are to use the teacher materials, and adults administer the tests, these products would not fall under the CPSC standards.

That being said, we want you to be aware of a few products that we copy in-house that are for use by children under twelve years of age—such as coloring books, flashcards, and handwriting pads. These items may come under the provisions of the CPSIA. We will address these items in two ways. First, as mentioned above, we will continue to look into the matter with Canon and provide our own certificates as needed. Secondly, we may produce some of these items out-of-house, which would resolve the situation because outside printers would be able to certify them without Christian Liberty Press doing third party testing.

Christian Liberty Press strives to provide its customers with safe and sound educational products that will help parents and teachers renew their students' minds to the glory of God.

Sincerely,

Lars R. Johnson

Administrative Director

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