



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

Memorandum

Date: JAN 2 2001

TO : The Commission
Sadye E. Dunn, Secretary

THROUGH : Michael Solender, General Counsel, Office of the *MSS*
General Counsel

THROUGH : Pamela Gilbert, Executive Director, Office of the *PG*
Executive Director

FROM : Ronald L. Medford, Assistant Executive Director, *RLM*
Office of Hazard Identification and Reduction
Kristina M. Hatlelid, Ph.D., M.P.H., Toxicologist, *KH*
Directorate for Health Sciences

SUBJECT : Transmission of a Letter from the National Candle
Association regarding Petition HP 00-3 to Ban Lead-
cored Candle Wicks

This memorandum transmits to the Commission a letter from the National Candle Association (NCA), dated October 18, 2000, regarding Petition HP 00-3 requesting a ban on lead-cored candle wicks.

The letter discusses the steps the NCA and its membership have taken to eliminate the use of lead in candle wicks and includes a statement to support a mandatory ban of lead-cored candle wicks if the Commission decides to grant the petition. The letter also describes the development of an ASTM voluntary standard in the use of lead in candle wicks. Although the staff has discussed the status of the ASTM standard in its briefing package, we wanted the Commission to have the letter when considering the petition.

Attachment

NOTE: This document has not been
reviewed or accepted by the Commission.
Initial SD Date 1/2/01

CPSA 6 (b)(1) Cleared
1/2/01 *PK*
No Mfrs/PrvtLbrs or
Products Identified
Excepted by *[Signature]*
Firms Notified.



National Candle Association

1030 - 15th Street, NW, Suite 870 • Washington, DC 20005 • (202) 393-2210 • Fax: (202) 393-0336
<http://www.candles.org>

October 18, 2000

Ms. Sadye Dunn
Secretary
U.S. Consumer Product Safety Commission
Washington, D.C. 20207

Re: Petition HP 00-3

Dear Ms. Dunn:

The National Candle Association submits these comments regarding Petition HP 00-3, Requesting a Ban of Candle Wicks Containing Lead and of Candles Containing Such Wicks. The National Candle Association (NCA) is the major organization of the candle-making industry. It includes over 70 North American candle manufacturers, and these members manufacture about 90% of all candles made in the United States. There are over 80 associate members of the NCA that are world-wide suppliers to the industry, including makers of wax, wicks, fragrance, machinery, molds, dyes, packaging/container materials and other industry-related products and services.

NCA members are committed to using only safe candlewicks and are committed to removal of all lead core wicks from the market. Our members report that they are not now manufacturing or using lead core wicks. The NCA has developed a voluntary pledge that all members have signed:

NCA PLEDGE

The National Candle Association and all its members reaffirm their voluntary pledge made in the 1970's not to use lead core wicks in candle products they make and sell. Further, they condemn the use of lead core wicks in any candle products sold worldwide. Finally, they commit to lead and/or support the development of voluntary candle metal core wick standards under the auspices of the American Society for Testing and Materials.

As described in the Pledge, the NCA has been actively working on a voluntary standard for candle products through the consensus process of the American Society for Testing and Materials (ASTM). We are pleased that the CPSC staff has been closely involved with this standard development, and we have welcomed their participation with the task groups and their attendance at meetings. Currently, in addition to the task group on wicks, task groups are at work on data, glass containers, labeling, and smoking. A terminology standard has been issued and a labeling standard is undergoing balloting.

The task group on wicks includes two members of the CPSC staff and a number of public interest representatives. This task group works via telephone conference calls, and it is focusing on eliminating the use of lead core wicks and setting safety-related limits on lead in other metal wicks. The wick task group made a progress report at the recent ASTM meeting on October 6 and is continuing its work expeditiously.

*Call clear
12/20/00
Candly
Waters*

2000 OCT 25 A 9:30
SECRETARY
FILED

Ms. Sadye E. Dunn
October 18, 2000

The NCA is concerned that non-members may be selling in the United States candles with lead core wicks. Therefore, the NCA has taken a number of important actions to inform non-NCA members of the problems with using such wicks and has urged that lead core wicks not be used or sold. Some NCA actions include:

- The NCA sent the enclosed letter to over 300 non-member American candle companies it could identify to inform them about the problems with lead core wicks. Over 100 of those companies have signed the NCA pledge. (Tab A)
- The NCA sent the enclosed letter to the six major retail associations asking them to notify their members about problems with selling candles with lead core wicks and included a sample letter for them to send to their members. (Tab B)
- NCA representatives met with the Latin American Candle Association to provide information about the importance of not using lead wicks. Members of this association export candles to the United States.
- Representatives of the NCA spoke at a meeting of the International Candle Makers' Guild, an organization of individual candle makers and small manufacturers. Many members of this organization are not members of the NCA, but we have strong liaison with this group. We do not believe that many of these manufacturers are using lead wicks, but we repeated warnings that lead core wicks should not be used in candles.
- At the request of the CPSC staff, NCA provided a list of Chinese manufacturers and importers of candles.
- A member company sent letters to over 200 Chinese candle manufacturers notifying them of the problem with lead core wicks, informing them of the voluntary standard activity, and asking them to sign the NCA pledge. (Tab C)
- The NCA is providing materials for its members to include in invoices to retailers to provide warnings about lead core wick candles. (Tab D)

The safety of candles is a top priority for the National Candle Association and we are committed to cooperating fully with the Consumer Product Safety Commission. In order to ensure that all candles sold in this country have safe wicks, we will support the Commission's action if it decides to grant the petition and develop a mandatory ban of candle wicks containing inappropriate amounts of lead. We will be happy to answer any questions you may have about the NCA and its work on lead in candles.

Sincerely yours,



John Root
President

Enclosures

TAB A

NCA PLEDGE

The National Candle Association and all its members reaffirm their voluntary pledge made in the 1970s not to use lead core wicks in candle products they make and sell. Further, they condemn the use of lead core wicks in any candle products sold worldwide. Finally, they commit to lead and/or support the development of voluntary candle metal core wick standards under the auspices of the American Society for Testing and Materials.

If you agree with the NCA and are not using lead core wicks, please let us add your name to our list of companies.

Yes, we do not manufacture or distribute candles with lead core wicks.

Signed: _____ Date: _____

Company: _____

Contact: _____ Tel: _____ Fax: _____

If you are interested in joining the NCA, please go to our website (www.candles.org) and download our application or give us a call at 202-393-2210. Ask for Marianne or Valerie.

If you are interested in joining the ASTM group working on standards for candle products, please contact Kathy Morgan at ASTM 610-832-9500.

TAB B



National Candle Association

1030 - 15th Street, NW, Suite 870 • Washington, DC 20005 • (202) 393-2210 • Fax (202) 393-0336
<http://www.candles.org>

June 14, 2000

National Retail Federation
Liberty Place
325 7th Street, N.W.
Suite 1100
Washington, DC 20004-2608

Dear Mr. Mullin:

Enclosed is an open letter from the National Candle Association alerting retailers who sell candles to a potential problem. We hope you will be able to pass along the letter by sending it to your members or, possibly, reprinting it in your newsletter to members.

If you have any questions, please do not hesitate to call me.

Sincerely,

Marianne McDermott
Executive Vice President

Enclosure: as stated



National Candle Association

1030 - 15th Street, NW, Suite 870 • Washington, DC 20005 • (202) 393-2210 • Fax: (202) 393-0336
<http://www.candles.org>

Dear Candle Retailer:

You may be aware of the recent controversy surrounding the use of lead-core wicks in candles. Consumers are rightfully concerned about any products containing lead of any substantial amount. Last fall, Australia banned lead-core wicks in candles based on a research study done on candles from China and Taiwan. Interest in the subject has developed in the U.S. and Ralph Nader's Public Citizen has filed a petition with the Consumer Product Safety Commission requested such a ban.

Members of the National Candle Association voluntarily stopped using lead-core wicks over 25 years ago when it was brought to their attention by the Consumer Product Safety Commission. The NCA has recently reaffirmed this voluntary ban and all candle manufacturer members of the NCA have signed a pledge not to use lead wicks. The Association has also contacted all known non-member U.S. candle manufacturers to acquaint them with the problem and ask that they sign such a pledge as well. Many have already done so.

In addition, the NCA is leading the work under the American Society of Testing and Materials to establish voluntary standards for candles and a task group is currently working on a standard for wicks.

We felt it was important for your retailers also to be aware of the situation so that they could take appropriate action. Many of the lead-core wicks are apparently present in imported candles. Although 80% of the candle wicks used by U.S. manufacturers are made of 100% cotton, the remaining metal wicks being used are made of zinc or tin, which are safe for consumers. A simple test can be made by the consumer or retailer to determine whether the metal is lead: if a paper is wiped across the metal, a lead wick will make a mark like a pencil.

The question of lead-core wicks in candles has become an important issue with the news media. There will no doubt be camera crews in retail stores this fall looking for candles with lead wicks. We might suggest that store managers be proactive in removing these candles from their shelves.

Sincerely,

John Root
President

TAB C

September 11, 2000

Regarding: Candle wicks with lead (Pb) metal wire cores

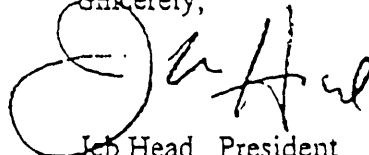
Dear Candle Producer:

I am writing today with a very important message regarding concerns about the safety of candles in the United States candle market. Recent scientific studies in Australia and the United States have found that candles with wicks made with lead (Pb) wire core emit potentially unhealthy levels of lead into the air. As a result, all lead (Pb) core wicks have been banned in Australia, and consumer advocates have called for lead (Pb) core wick to be banned and recalled in the United States.

The news media in the United States has followed this story very closely, and the candle buying public has become very apprehensive about lead emissions from candles. The National Candle Association of the United States has issued a pledge condemning the use of lead (Pb) core wicks. Further, standards are being written by industry and health based organizations that limit the lead content in candle wick to less than 0.01% by weight.

I have attached the National Candle Association pledge for your review. Please consider signing the pledge and returning it either to me, or the National Candle Association. It is very important that no candles with lead (Pb) wire wicks be sold in the United States. Please contact me if you have any questions. I will be happy to forward you any information you may require. Thank you for your attention to this very important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Job Head". The signature is written in a cursive style with a large initial "J" and "H".

Job Head, President
Atkins & Pearce, Inc.

NCA PLEDGE

The NCA and all its members reaffirm their voluntary pledge made in the 1970's not to use lead core wicks in candle products they make and sell. Further, they condemn the use of lead core wicks in any candle products sold worldwide. Finally, they commit to lead and/or support the development of voluntary ASTM candle metal core wick standards.

TAB D



WARNING TO RETAILERS

You may be aware of the recent controversy surrounding the use of lead in candle wicks. Consumers are rightfully concerned that many of the imported candles contain lead-core wicks. Ralph Nader's Public Citizen has petitioned the Consumer Product Safety Commission to institute a ban on lead wicks and to recall such products. The National Candle Association and all of its members have pledged not to use such wicks as have most U.S. candle manufacturers.

Most U.S. made candles contain wicks made of 100% cotton and some still have zinc-core wicks which are safe. A simple test, if a candle you are selling has a metal in the wick, is to rub a piece of paper over the metal. If it leaves a mark (like a lead pencil would), it is a lead-core wick.

We urge you to take action to check the candles on your shelves before the holiday purchasing season begins. The media has taken quite an interest in this issue and could visit your stores to find such candles for their next story.

NATIONAL CANDLE ASSOCIATION

www.candles.org



National Candle Association

1030 - 15th Street, NW, Suite 870 • Washington, DC 20005 • (202) 393-2210 • Fax: (202) 393-0336
<http://www.candles.org>

May 15, 2000

Dear Candle Manufacturer:

You may be aware of the controversy surrounding the use of lead-core wicks in candles. Recently, there has been much negative coverage by the media, which the National Candle Association has worked very hard to counter. Most of the interest resulted from a study publicized by the University of Michigan, which followed on the heels of a ban of lead-core wicks by the Australian government.

Members of the National Candle Association voluntarily stopped using lead-core wicks over 25 years ago when we were approached by the Consumer Product Safety Commission questioning the safety of such wicks. With the explosive growth of the industry and the emergence of more candle manufacturers, we recently asked our members to reaffirm their pledge not to use lead-core wicks.

Consumers are rightfully concerned about any products containing lead of any substantial amount and our members who still use metal wicks have found that zinc- and tin-core wicks serve just as well. In fact, many of our manufacturing members use only cotton wicks. We are working closely with the Consumer Product Safety Commission and have offered to contact all the candle manufacturers who are not members of our organization to warn them of the dangers of using lead wicks and to encourage them to discontinue their use.

The NCA has also begun to work with the American Society for Testing and Materials, a highly respected and recognized authority for setting standards, to develop standards for the industry. Currently, we have task groups working on fire data evaluation, labeling, terminology, glass containers, smoking and now wicks. We welcome your involvement and interest. If you would like to join us either as NCA members or as part of the ASTM task groups, please indicate your interest on the attached forms and we will contact you personally.

Sincerely,

John Root
NCA President