U.S. Consumer Product Safety Commission



16 CFR Part 1633: After the Effective Date

American Home Furnishings Alliance Flammability Workshop

Greensboro, North Carolina March 20, 2008 Allyson Tenney, Project Manager Directorate for Engineering Sciences

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Summary of Discussion

- Background
- Implementation of the standard
- Selected problem areas observed by CPSC staff
- New materials, references, and resources
- Closing remarks

Background

- Mattress fires are one of the leading causes of fire deaths and injuries associated with consumer products
- CPSC project work began in 2000

 ANPR: October 2001
 - NPR: December 2004
 - Final Rule: March 2006
- Standard addresses hazards associated with mattress fires

Mattresses (open-flame) 16 CFR Part 1633

- 16 CFR Part 1633: Standard for the Flammability (Open-Flame) of Mattress Sets
- Final Rule published March 15, 2006
- Effective: <u>JULY 1, 2007</u>

Mattresses with Conventional Materials

> 1,000 kW fire

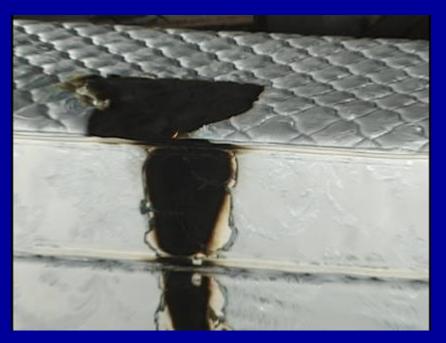
at 5 minutes



Improved Mattress Performance

Peak rate of heat release after exposure to burners





Under 100 kW

Under 50 kW

Implementation of 16 CFR Part 1633

- Conducted two staff seminars for manufacturers, East and West coasts
- Held seminar for retailers
- Participated in industry sponsored meetings and seminars
- Dedicated Mattress Information Webpage
- Developed informational brochure
- Compiled Question & Answer document

16 CFR Part 1633: Selected Problem Areas Observed by CPSC Staff

- Scope
- Prototypes and subordinate prototypes
- Recordkeeping requirements
- Labeling requirements
- Establishment inspections

16 CFR Part 1633: Scope

- All mattress sets <u>manufactured</u> on or after July 1, 2007 and sold in the U.S.
- In scope
 - Mattress sets (mattress + foundation/ mattress alone)
 - Any size (e.g., Crib, Twin, Full, Queen, King)
 - Futons, multi-purpose items, mattresses in furniture
 - Mattresses in non-motorized trailers
 - Renovated products, not sterilization

16 CFR Part 1633: Scope

• Not in scope:

- Mattress pads
- Water/air mattresses that do not contain filling materials between the core and ticking
- Furniture that does not contain a mattress
- Juvenile product pads
- Pet beds
- Ask CPSC Staff (Office of Compliance) for guidance

Prototypes

- All items in scope must be based on a tested prototype
- Prototype is a specific mattress set design that serves as a model for production units; same with respect to materials, components, and methods of assembly
- Types of Prototypes
 - Qualified
 - Confirmed/pooled
 - Subordinate

Qualified & Confirmed Prototypes

- Qualified prototype:
 - Tested and meets the requirements
 - Requires 3 consecutive passing tests before sale
- Confirmed (pooled) prototype:
 - Same as qualified prototype with respect to materials, components, design, assembly
 - Pooled based on another manufacturer's qualified prototype
 - Requires 1 passing test

Subordinate Prototypes

- Subordinate prototype:
 - Based on qualified or confirmed prototype
 - Represented and need not be tested
 - Same except as permitted by §1633.4(b)
- §1633.4(b) permits:
 - Differences in length and width, not depth
 - Ticking changes, unless used to improve performance
 - Changes to any component, material, design, or method of assembly if it can be demonstrated on an objectively reasonable basis that the change will not cause a failure

Objectively Reasonable Basis

- Decision made by individual manufacturer based on factual information— objectively reasonable criteria
- Based on test data
 - Type of data
 - Amount of data
 - Quality of data
- Identical properties/specifications
- Equivalent performance
- Component performance and system interaction
- Documented and recorded in detail

Recordkeeping Requirements

- Required recordkeeping:
 - Prototype records
 - Test records (prototype, production)
 - Quality assurance records
- Prototype records:
 - Kept for life of prototype + 3 years
 - Detailed list of materials, components, assembly methods, design description
 - Identify prototypes
 - Correspond to label information

Labeling Requirements

- Requires permanent, conspicuous, and legible label in English
 - Allows alternate language on reverse
- Manufacturer name and address
- Month and year of manufacture
- Model identification
- Prototype identification number
 - Qualified, subordinate, or confirmed
 - Must correspond to records
- Certification statement
- Set information
- Bar codes/tracking information is allowed

Establishment Inspections

- Compliance Establishment Inspection
 - Typically unannounced
- Obtain information regarding:
 - Business operations and management
 - Manufacturing & production
 - Testing
 - Inventory
 - Sales & distribution
 - Recordkeeping
- Confidentiality
 - Confidential business information or trade secret shall be treated as confidential*
- After the inspection
 - Written response will be received from Office of Compliance

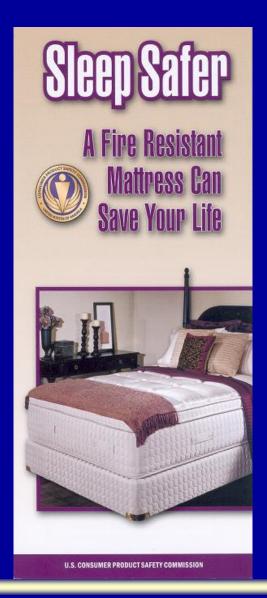
New Materials, References, & Resources

- 16 CFR Part 1633 Correcting Amendment
 - Edits & technical corrections
 - Federal Register, Vol. 73, No. 25, 6842-6843
 - February 6, 2008
- Laboratory Test Manual
- List of testing laboratories
- Website & subscriber list-serve

www.cpsc.gov/businfo/mattress

🗿 Mattress Flammability Information - Microsoft Internet Explorer provided by US CPSC	<u>- X</u>
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Mattress Flammability Information	
Last updated February 7, 2008	
The links contained on this page are to be used as a tool to help easily access an overview of mattress flammability information. Much more information and many additional links are available on the CPSC site and can be located by conducting a <u>search</u> .	
New! Join the New Mattress Information E-mail List to Receive Periodic Updates from CPSC	
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If subscribing, a message will be sent to the email address you entered, asking you to confirm your subscription by replying to the message. As per CPSC's <u>privacy policy</u> , we will not disclose your email address or use it for any other purpose. If unsubscribing, a message will be sent to the email address you entered verifying that you unsubscribed.	
Standard for the Flammability of Mattresses and Mattress Pads - 16 CFR 1632	
Regulation 1632	
Test Manual	
Regulatory Summary for Mattresses	
Interim Enforcement Policy	
New Standard: Standard for the Flammability (Open Flame) of Mattress Sets - 16 CFR 1633	
Regulation 1633	
New! Final Rule; Standard for the Flammability (Open Flame) of Mattress Sets; Correction, February 6, 2008 [Text] [PDF]	
Interim Enforcement Policy	
Office of Compliance and Field Operations' Enforcement Guidance Concerning CPSC Mattress Set Rule for Mattress Sets that are Medical	

Closing Remarks



For Further Information:



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