**Writing Instruments\* Check List (General Use)**

**Product Requirements**

Country of Origin Marking. 19 CFR 134.11

*Testing not required; visual inspection ok.*

**California Prop 65**

Lead in Substrates and Surface Coatings <90 ppm

*May use CPSIA lead testing data. Additional testing typically not required.*

Phthalates (DBP, BBP, DEHP, DINP, DIDP, DnHP)

*Testing may not be necessary if no plastic components. Consult with Anseco on a case by case basis.*

Total Cadmium in Surface Coatings and Substrates

Bisphenol A (BPA) (<100PPT)

***A warning label on the product, packaging and marketing materials will be required for products going into California if phthalates/Cadmium/BPH is in excess of the safe harbor limits. If lead is in excess of the 90/100 ppm, the product may not be sold anywhere in the United States as the product would be deemed a banned hazardous substance.***

**Packaging Requirements**

TPCH/Coneg/Toxic Elements in Packaging Material (sum of cadmium, hexavalent chromium, lead and mercury in packaging and packaging components shall be < 100ppm by weight)

Plastic Bag Warning. **“Warning: To avoid danger of suffocation, keep this plastic bag away from babies and children. Do not use this bag in cribs, beds, carriages or playpens. This bag is not a toy.”**

*Testing not required; visual inspection is ok.*

Prop 65 Warning Label if phthalates, cadmium and/or BPA in excess of the safe harbor limits is present.

**Marketing Material Requirements**

Prop 65 Warning Labels (including on websites, catalogs)

\*Traditional pens, pencils, and markers (excluding art supplies) are typically general use products, even when the writing instrument contains artwork that could be appealing to a child, such as cartoon characters. However, if there are other accessories, such as, but not limited to “hair,” “google eyes,” or other accessories that are appealing to a child, then the writing instrument may be deemed a children’s product.

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