



## Washington State Children's Safe Products Act (WA CSPA)

### CSPA 法规---美国华盛顿州《儿童产品安全法》

In July 2011, Ecology Department of Washington approved the children's product safety act of 173-334 - WAC chapter (CSPA regulations). The regulations aims to collect related information help the government and the public better understanding of the chemicals existing in children's products. It requires children's products manufacturers (including producer, importer & domestic distributor) to declare the Chemical of High Concern to Children for Ecology Department of Washington.

2011年7月，华盛顿生态部(Ecology Department of Washington)批准通过了《儿童产品安全法申报规则》第173-334-WAC章(CSPA法规)。该条例旨在收集相关信息，帮助政府和公众更好地了解儿童产品中存在的化学物质。它要求儿童产品制造商(包括生产商、进口商和国内经销商)向生态部申报产品中对儿童具有高风险的化学物质(CHCCs)的存在情况。

This regulation control children's products including toys, children's cosmetics, children's jewelry, children's clothing (including shoes), children's car seat, and the products which intent to help children suck, teething, promote children's sleep, relax or feed. At present, the Ecology Department of Washington require that the largest manufacturer who manufacture the Children's products intended to be put into a child's mouth, or applied to the child's body, or any mouthable Children's products intended for children who are age three or under should report before August 21, 2012. Washington will take enforcement action to the manufacturer whose products need to be declared but undeclared.

该条例管制的儿童产品包括玩具、儿童化妆品、儿童首饰、儿童服装(包括鞋子)、儿童汽车坐椅，以及意图帮助儿童吮吸和出牙、促进儿童睡眠、放松或喂食的产品。目前，华盛顿生态部要求，第一批申报的产品是意图放入儿童口中、应用于儿童身体或皮肤、或供3岁及以下儿童使用的任何可以放入嘴部的儿童产品的最大规模生产商，应在2012年8月21日前进行申报，华盛顿州将对需申报但未申报的产品采取执法行动。

CSPA regulations declaration content: whether it contains CHCCs, if contain, the related content are given. If the department finds that a children's product component contains a chemical on the CHCCs list that the manufacturer either has not reported, or has reported at a lesser amount, the department will notify the responsible party in writing. The department will then afford the responsible party forty-five days from receipt of the department's notification to respond to the findings. If further information can be fully prove the rationality of the differences, the ecological department will not take any further measures. If further information is not reasonable to explain differences, the ecological department will take formal law enforcement action. If the manufacturer did not respond notice for the first time, the ecological will automatic take enforcement action.



CSPA 法规的申报内容：是否含有 CHCCs，如果含有，则给出相关含量。如果生态部发现儿童产品含有 CHCCs 生产商没有申报或者申报了一个较小的含量，将联络相关责任方更改，要求其在 45 天内提交补充信息。如果补充信息可以充分证明差异的合理性，则生态部不会采取进一步措施。如果补充信息无法合理解释差异，则生态部将采取正式的执法行动。如果生产商没有对第一次通知作出反应，则生态部将自动采取执法行动。

## 1. First Annual Report Due Date

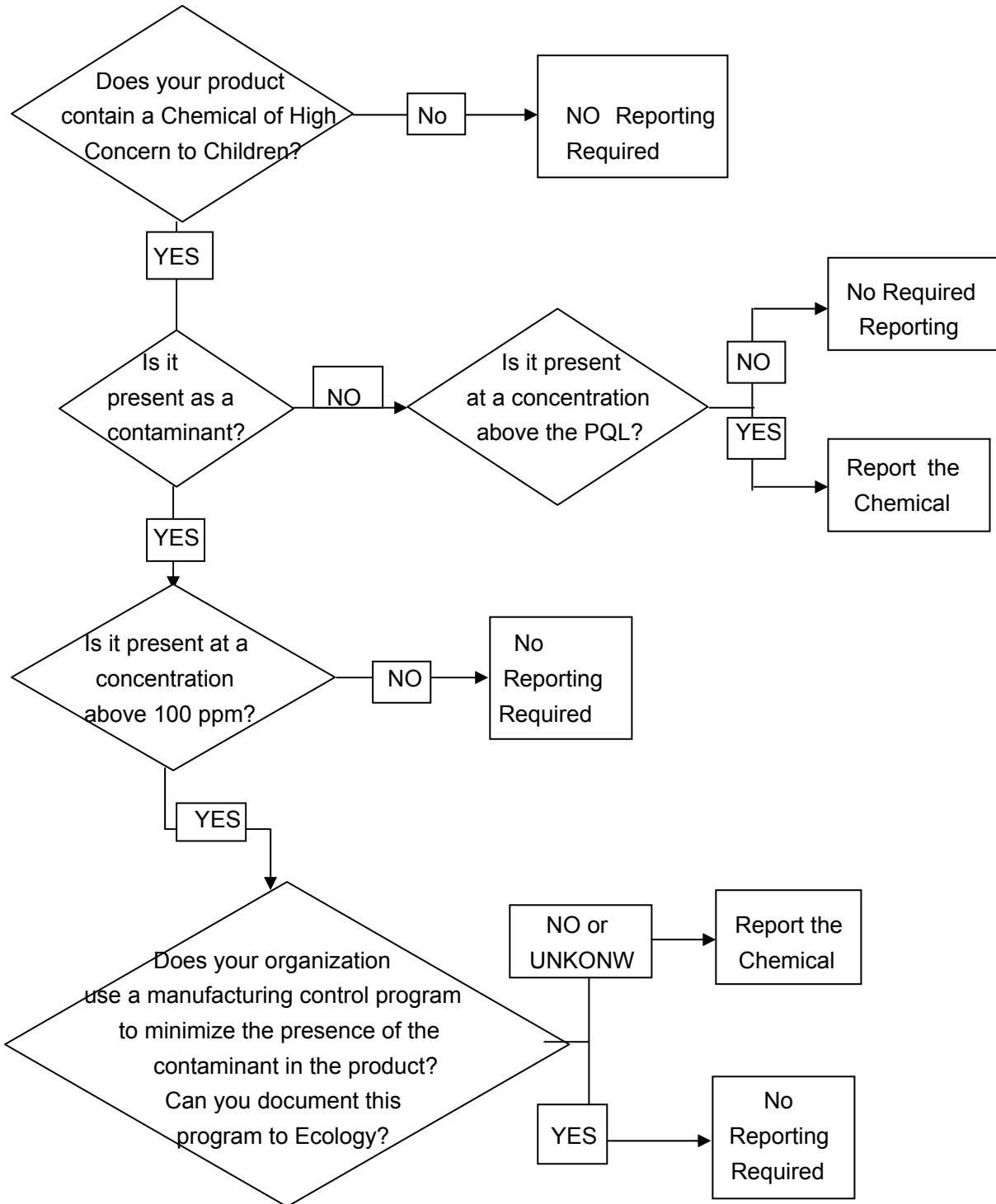
### 第一次申报截止日期

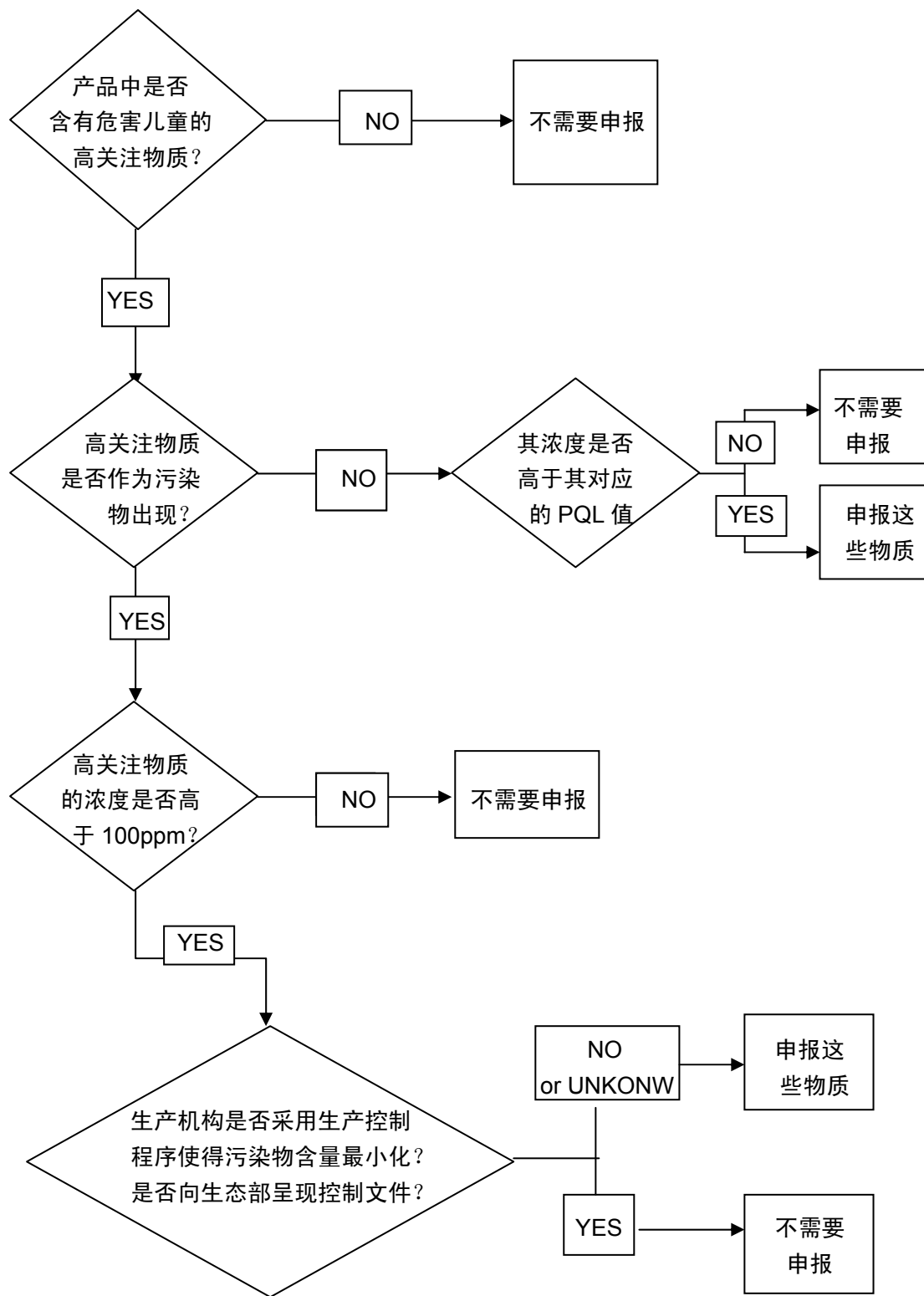
Manufacturer (including producer, importer & domestic distributor) categories (divided by annual aggregate gross sales(X) in USD, within and outside of Washington) 制造商（包括生产商、进口商和国内经销商）类别（根据制造商的年总销售总额X（美元）划分，包括华盛顿内、外部的总销售额）	intended to be put into a child's mouth or applied to the child's body 意图放入儿童口中或者与儿童身体接触的产品	Prolonged direct skin contact for >1hour 直接接触儿童皮肤超过一个小时的产品	Direct skin contact for <1hour 直接接触儿童皮肤不超过一个小时的产品	Not come into direct contact skin or mouth 不接触或难以接触儿童嘴巴和皮肤的产品
Largest (X>1 billion) 最大规模的生产商 (X>10亿)	2012-08-21	2013-02-21	2013-08-21	case-by-case 具体分析
Larger (250 million <X≤1 billion) 大规模的生产商 (2.5亿<X≤10亿)	2013-02-21	2013-08-21	2014-08-21	case-by-case 具体分析
Medium (100 million <X≤250 million) 中等规模的生产商 (1亿<X≤2.5亿)	2013-08-21	2014-08-21	2015-08-21	case-by-case 具体分析
Small (5million <X≤100 million) 小规模的生产商 (500万<X≤1亿)	2014-08-21	2015-08-21	2016-08-21	case-by-case 具体分析
Smaller (100,000 <X≤5 million) 更小规模的生产商 (10万<X≤500万)	2015-08-21	2016-08-21	2017-08-21	case-by-case 具体分析
Tiny(X ≤100,000) 极小规模的生产商 (X≤10万)	2016-08-21	2017-08-21	2018-08-21	case-by-case 具体分析



## 2. Reporting Guidance – Reporting Contaminants and Due Diligence

### 申报指南—申报污染物以及严格评估





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**REMARK: 备注**

1. "Contaminant" means trace amounts of chemicals that are incidental to manufacturing. They serve no intended function in the product component. They can include, but are not limited to, unintended by-products of chemical reactions during the manufacture of the product component, trace impurities in feed-stock, incompletely reacted chemical mixtures, and degradation products.

“污染物”是指生产过程中所附带的微量的化学物质。它们在产品的组件中没有设定的作用。它们可以包括但不限于以下物质：生产过程中的化学反应带来的副产物、原料中的微量杂质、不完全反应的化学混合物、降解产物。

2. "Intentionally added chemical" means a chemical in a product that serves an intended function in the product component.

“故意添加化学物质”是指一种化学物质在产品的组件中可以起到设定的作用。

3. "Practical quantification limit (PQL)" means the lowest concentration that can be reliably measured.

实际量化极限（PQL）：即是可以被准确检出的最低浓度。

4. Ecology anticipates that there will be situations where the same chemical in the same product category or component could be considered a contaminant in one situation and intentionally added in another. Below are a few examples to illustrate this point.

生态部预计将会有这样的情况：同种化学物质，在同一类产品或组件中，一种情况被视为污染物，另外一种情况被视为故意添加的物质。下面几个例子来说明这一点。

Example 1: A manufacturer makes a variety of shirts. Some are designed to be wrinkle free and others that are not. Where Chemical Z is added to help the shirt remain wrinkle-free, Ecology would consider Chemical Z to be intentionally added and the manufacturer would have to report the amount, irrespective of the concentration. For shirts where Chemical Z is not added intentionally, but there is some present in the final product anyway, the manufacturer has one of two options:

- 1) Report the presence of Chemical Z if its concentration is above 100 ppm.
- 2) Rely on their ability to demonstrate to the agency that a manufacturing control and due diligence program was in place that minimized the presence of Chemical Z.





示例 1: 一个制造商生产各种各样的衬衫。一些被设计为没有皱褶的、一些有皱褶。在化学物质 Z 添加到衬衫中起到防皱的作用, 生态部会认为化学物质 Z 是故意添加的化学物质, 不论其浓度的大小, 制造商将必须申报。对于一些衬衫中, 化学 Z 不是有意添加的, 但是有些最终的产品中出现了化学物质 Z, 这种情况下, 制造商有两种选择:

- 1) 如果其浓度高于 100 ppm, 申报存在化学物质 Z。
- 2) 向生态部解释其在学习过程中的严格控制和评估能力, 已使得化学物质 Z 的含量最小化。

Example 2: If Metal Y is used to provide malleability in a metal used in jewelry, the concentration of Metal Y added to products would need to be reported at any concentration above the practical quantification limit. But if Metal Y is present in jewelry due to small amounts inadvertently being transferred from the mold to the jewelry, it would be considered to be a contaminant. The manufacturer again has one of two options:

- 1) Report the presence of Metal Y if its concentration is above 100 ppm.
- 2) Rely on their ability to demonstrate to the agency that a manufacturing control and due diligence program was in place that minimized the presence of Metal Y.

示例 2: 如果金属 Y 在珠宝中是用来增加金属的延展性, 金属 Y 被视为故意添加物质, 其浓度超过实际量化限制 (PQL) 即需要申报。但如果少量金属 Y 存在于珠宝中, 是通过模具而无意中转移到珠宝中, 它将被认为是一种污染物。这种情况下, 制造商有两种选择:

- 1) 如果其浓度高于 100 ppm, 申报存在金属 Y。
- 2) 向生态部解释其在学习过程中的严格控制和评估能力, 已使得金属 Y 的含量最小化。

Example 3: A manufacturer is making a material to be molded into a plastic toy. Chemical A is combined with Chemical B to make Plastic Material C that has essential properties needed to produce the plastic toy. Some trace amounts of Chemicals A and B remain in plastic material C. Chemicals A and B would be considered contaminants. The manufacturer has one of two options:

- 1) Report the presence of Chemicals A and B if the concentration of either chemical is above 100 ppm.
- 2) Rely on their ability to demonstrate to the agency that a manufacturing control and due diligence program was in place that minimized the presence of Chemicals A and B.



示例 3:一个制造商生产为制造塑料玩具的材料。化学物质 A 和化学物质 B 结合得到了制造塑料玩具的材料 C。材料 C 中含有一些微量的化学物质 A 和 B。化学物质 A 和 B 将被认为是污染物。这种情况下，制造商有两种选择：

- 1) A 和 B 任何一种物质的浓度高于 100ppm，就需要申报这两种化学物质 A 和 B。
- 2) 向生态部解释其在生产过程中的严格控制和评估能力，已使得化学物质 A 和 B 的含量最小化。

### 3. High Concern Chemical List: 高关注物质清单

Chemical of High Concern to Children (CHCCs) of the United States in Washington state CSPA regulations, which contains 66 items substances, specific as follows:

美国华盛顿州 CSPA 法规中需要高度关注的用于儿童的化学物质清单(CHCCs)中共有 66 项高度关注物质，具体如下：

NO. 序号	Substance Name 物质名称	CAS NO. CAS 号码	Practical Quantification Limit(PQL) 实际量化极限 (ppm)
1	Formaldehyde 甲醛	50-00-0	5.0
2	Aniline 苯胺	62-53-3	1.0
3	N-Nitrosodimethylamine N-二甲基亚硝胺	62-75-9	1.0
4	n-Butanol 正丁醇	71-36-3	5.0
5	Benzene 苯	71-43-2	1.0
6	Vinyl chloride 氯乙烯	75-01-4	1.0
7	Acetaldehyde 乙醛	75-07-0	1.0
8	Methylene chloride 二氯甲烷	75-09-2	1.0
9	Carbon disulfide 二硫化碳	75-15-0	10.0
10	Methyl ethyl ketone 甲基乙基酮	78-93-3	1.0
11	1,1,2,2-Tetrachloroethane 1,1,2,2-四氯乙烷	79-34-5	1.0
12	Tetrabromobisphenol A 四溴双酚A	79-94-7	20.0
13	Bisphenol A 双酚A	80-05-7	20.0
14	Diethyl phthalate (DEP) 邻苯二甲酸二乙酯	84-66-2	5.0
15	Dibutyl phthalate (DBP) 邻苯二甲酸二丁酯	84-74-2	5.0
16	Di-n-Hexyl phthalate (DNHP) 邻苯二甲酸二己酯	84-75-3	5.0
17	Phthalic anhydride 邻苯二甲酸酐	85-44-9	100.0
18	Butyl benzyl phthalate (BBP) 邻苯二甲酸丁苄酯	85-68-7	5.0
19	N-Nitrosodiphenylamine N-亚硝基二苯胺	86-30-6	1.0
20	Hexachlorobutadiene 六氯丁二烯	87-68-3	30.0



NO. 序号	Substance Name 物质名称	CAS NO. CAS 号码	Practical Quantification Limit(PQL) 实际量化极限 (ppm)
21	Propyl paraben 尼泊金丙酯	94-13-3	30.0
22	Butyl paraben 尼泊金丁酯	94-26-8	30.0
23	2-Aminotoluene 邻甲基苯胺	95-53-4	1.0
24	2,4-Diaminotoluene 2,4-二氨基甲苯	95-80-7	10.0
25	Methyl paraben 尼泊金甲酯	99-76-3	30.0
26	p-Hydroxybenzoic acid 对羟基苯甲酸	99-96-7	10.0
27	Ethylbenzene 乙苯	100-41-4	1.0
28	Styrene 苯乙烯	100-42-5	1.0
29	4-Nonylphenol; 4-NP and its isomer mixtures including 4-(7-methyloctyl)phenol (CAS 84852-15-3) and Nonylphenol (CAS 25154-52-3) 4-壬基苯酚及其同分异构体混合物	104-40-5	10.0
30	para-Chloroaniline 4-氯苯胺	106-47-8	60.0
31	Acrylonitrile 丙烯腈	107-13-1	1.0
32	Ethylene glycol 乙二醇	107-21-1	5.0
33	Toluene 甲苯	108-88-3	1.0
34	Phenol 苯酚	108-95-2	60.0
35	2-Methoxyethanol 乙二醇甲醚	109-86-4	10.0
36	Ethylene glycol monoethyl ester 乙二醇单乙醚	110-80-5	10.0
37	Tris(2-chloroethyl) phosphate 磷酸三(2-氯乙基)酯	115-96-8	50.0
38	Di-2-ethylhexyl phthalate (DEHP; DOP) 邻苯二甲酸二辛酯	117-81-7	20.0
39	Di-n-octyl phthalate (DnOP) 邻苯二甲酸二正辛酯	117-84-0	5.0
40	Hexachlorobenzene 六氯苯	118-74-1	30.0
41	3,3'-Dimethylbenzidine and Dyes Metabolized to 3,3'-Dimethylbenzidine 3,3'-二甲基联苯胺	119-93-7	10.0
42	Ethyl paraben 尼泊金乙酯	120-47-8	30.0
43	1,4-Dioxane 1,4-二氧六环	123-91-1	1.0
44	Perchloroethylene 四氯乙烯	127-18-4	0.5
45	Benzophenone-2(Bp-2); 2,2',4,4'-Tetrahydroxybenzophenone、 2,2',4,4'-四羟基二苯甲酮	131-55-5	20.0
46	4-tert-Octylphenol; 1,1,3,3-Tetramethyl-4-butylphenol 对特辛基苯酚	140-66-9	10.0

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NO. 序号	Substance Name 物质名称	CAS NO. CAS 号码	Practical Quantification Limit(PQL) 实际量化极限 (ppm)
47	Estragole 4-烯丙基苯甲醚	140-67-0	10.0
48	2-Ethylhexanoic acid 异辛酸	149-57-5	1.0
49	Octamethylcyclotetrasiloxane 八甲基环四硅氧烷	556-67-2	10.0
50	Benzene, pentachloro 五氯苯	608-93-5	1.0
51	C.I. solvent yellow 14 苏丹红一号	842-07-9	1.0
52	N-Methylpyrrolidone N-甲基吡咯烷酮	872-50-4	50.0
53	2,2',3,3',4,4',5,5',6,6'-Decabromodiphenyl ether; BDE-209 十溴联苯醚	1163-19-5	10.0
54	Perfluorooctanyl sulphonic acid and its salts; PFOS 全氟辛烷磺酸盐	1763-23-1	1.0
55	Phenol, 4-octyl- 对辛基苯酚	1806-26-4	10.0
56	2-Ethyl-hexyl-4-methoxycinnamate 对甲氧基肉桂酸 辛酯	5466-77-3	5.0
57	Mercury & mercury compounds including methyl mercury (22967-92-6) 汞及其化合物包括甲基汞	7439-97-6	0.5
58	Molybdenum & molybdenum compounds 钼及其化 合物	7439-98-7	1.0
59	Antimony & Antimony compounds 锑及其化合物	7440-36-0	1.0
60	Arsenic & Arsenic compounds including arsenic trioxide (1327-53-3) & dimethyl arsenic (75-60-5) 砷及其化合物包括三氧化二砷和二甲次胂酸	7440-38-2	1.0
61	Cadmium & cadmium compounds 镉及其化合物	7440-43-9	1.0
62	Cobalt & cobalt compounds 钴及其化合物	7440-48-4	1.0
63	Butylated hydroxyanisole; BHA 叔丁基-4-羟基苯甲 醚	25013-16-5	10.0
64	Hexabromocyclododecane 六溴环十二烷	25637-99-4	10.0
65	Diisodecyl phthalate (DIDP) 邻苯二甲酸二异癸酯	26761-40-0	50.0
66	Diisononyl phthalate (DINP) 邻苯二甲酸二异壬酯	28553-12-0	50.0

#### 4. Our Solutions: 解决方案

AOV provides you fast, convenient, and reliable testing service on current Washington State 66 CCHCs. It helps you to obtain the necessary CHCCs information and public confidence for your products. AOV is also providing you the convenience to test US federal law CPSIA and Washington State CSPA as a package. The consolidated package reports help companies on fulfilling the general US legal requirements on children's products more time and

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cost efficiently. Furthermore, for your companies which selling products to the two major markets of the world, United States and European Union, a multi-functional testing package combining US CPSIA/CSPA and EU REACH requirements, helps you on legal compliance in an easy and comprehensive manner. Such a testing package could also work as prototype of a reasonable product safety management system which is essential for the long run.

AOV 为您提供快速、方便、可靠的华盛顿州66 CHCCs测试服务。帮助您获得必要的CHCCs信息和您产品的公信力。AOV 也提供美国联邦法律CPSIA和华盛顿州CSPA作为一体的便捷测试服务，帮助企业在更有效的时间和成本上满足一般的美国儿童产品法律要求。此外,对于您公司产品销售给美国和欧盟这两个主要市场时，一个多功能便捷测试服务包括CPSIA / CSPA和欧盟REACH,帮助您使用一个便捷和综合的方式遵守法律。这样一个一体化测试，也可以作为一个合理的产品安全管理系统，长远来看它是必不可少的。

AOV is ready to help you and your supply chain to comply with WA CSPA rules and others. Various testings & consulting services are described in the below table.

AOV 将帮助您及供应商满足WA CSPA 以及其他条例的要求，以下表格中是各种测试及咨询服务。

Service Items/服务项目	Solutions/解决方案
High Concern Material Test of Children's Products 儿童产品的高关注物质测试	Test report of CHCCs contents per product 每种产品的华盛顿 CSPA 测试报告 Comprehensive report for US CPSIA + WA CSPA 综合性报告：美国 CPSIA+华盛顿 CSPA Combined Test report of US CPSIA, WA CSPA & EU REACH 一体化测试报告：美国 CPSIA、华盛顿 CSPA 以及欧盟 REACH
Manufacturing Control Program(MCP) Services 制造商的控制程序服务	Program design, Program training, Program verification 程序设计、程序培训以及程序检定 Material risk report on 66 CHCCs 危险材料的 66 项高危物质的报告 Training for vendors on the MCP 对供应商控制程序的培训 Chemical management system audit 化学品管控程序的审核