

AHFA Regulatory Summit

It's All About the Label

August 2023





Welcome & Settle In

Overview of our Time:

- Background
- Stuffed Article Compliance
 - What's Regulated (& Where)
 - Labeling & Licensing
- Landscape: Recent & Upcoming Changes

UNDER PENALTY OF LAW THIS TAG NOT TO BE REMOVED EXCEPT BY THE CONSUMER
ALL NEW MATERIAL consisting of
REG. NO.
Certification is made by the manufacturer that the materials in this article are described in accordance with law.
MADE BY
Date of Delivery..... Fin. Size: Net Wt. of Filling Matl: FEDERAL REQUIREMENT: RN Covering:
MADE IN

Deven Wisner, VP

American Law Label &
Global Registration Services

- Based in **Tucson, AZ**
- Over a **decade** in the **compliance and labeling space** (by accident)
- Background in **org development and analytics**





GLOBAL
REGISTRATION
SERVICES, INC



American
LAW LABEL, INC.

The pioneer and worldwide leader in compliance for stuffed articles of bedding, furniture and more. We partner with manufacturers, suppliers, and leading retailers to make compliance simple, transparent, and hassle-free.

Our Solutions Include:

- Label design, auditing, and printing
- License registration and management
- State liaison and violation resolution
- Online compliance database for retailers
- Test lab integration



Let's hear from you:



What's the number one question I'm asked?



Confidence in your current labeling practices.

Stuffed Article Compliance



What's regulated (& where)?

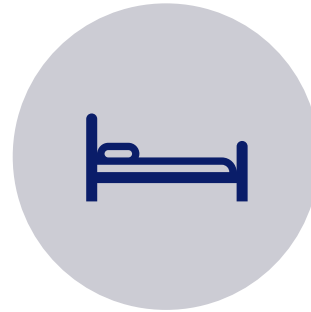
Licensing

Labeling

Regulated Products



Caveat: Always up to the state how an item is regulated. Each state can have their own interpretation and determination.



Bedding is usually strictly defined as items that can be slept on, lied on, reclined on.



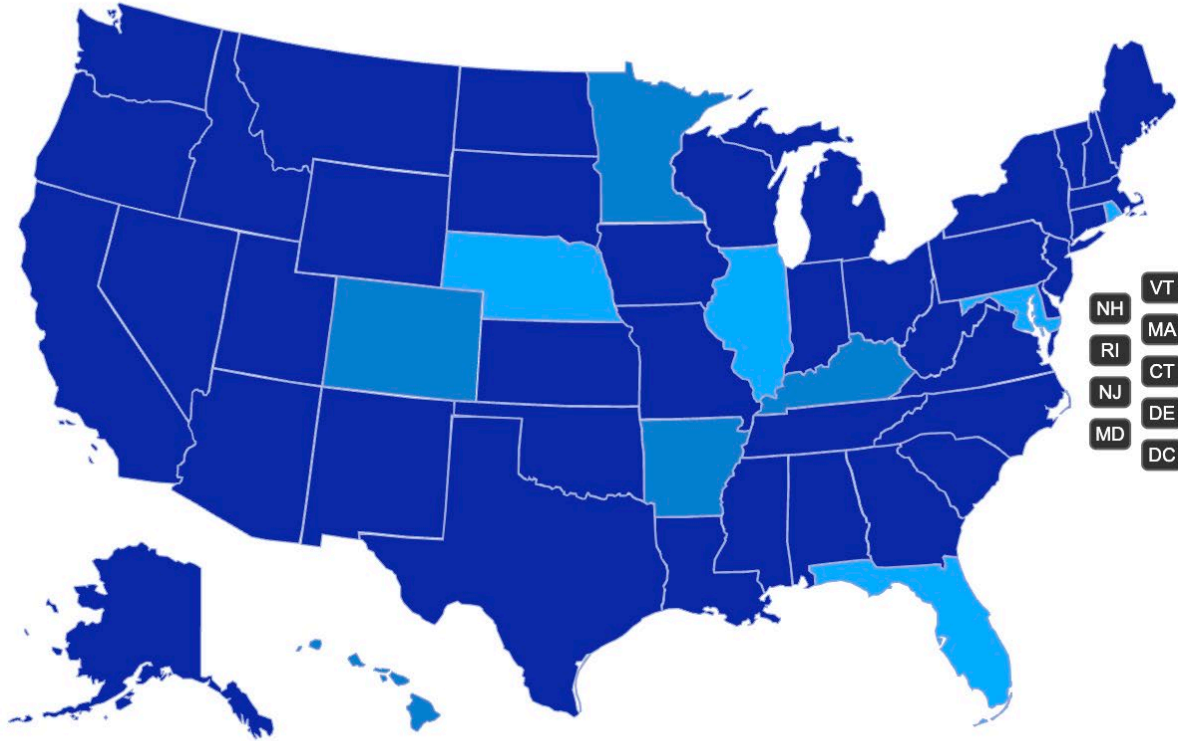
Furniture is a broad classification that can extend to a variety of stuffed articles



Stuffed Toys are usually something marketed to children that can be played with by hand.

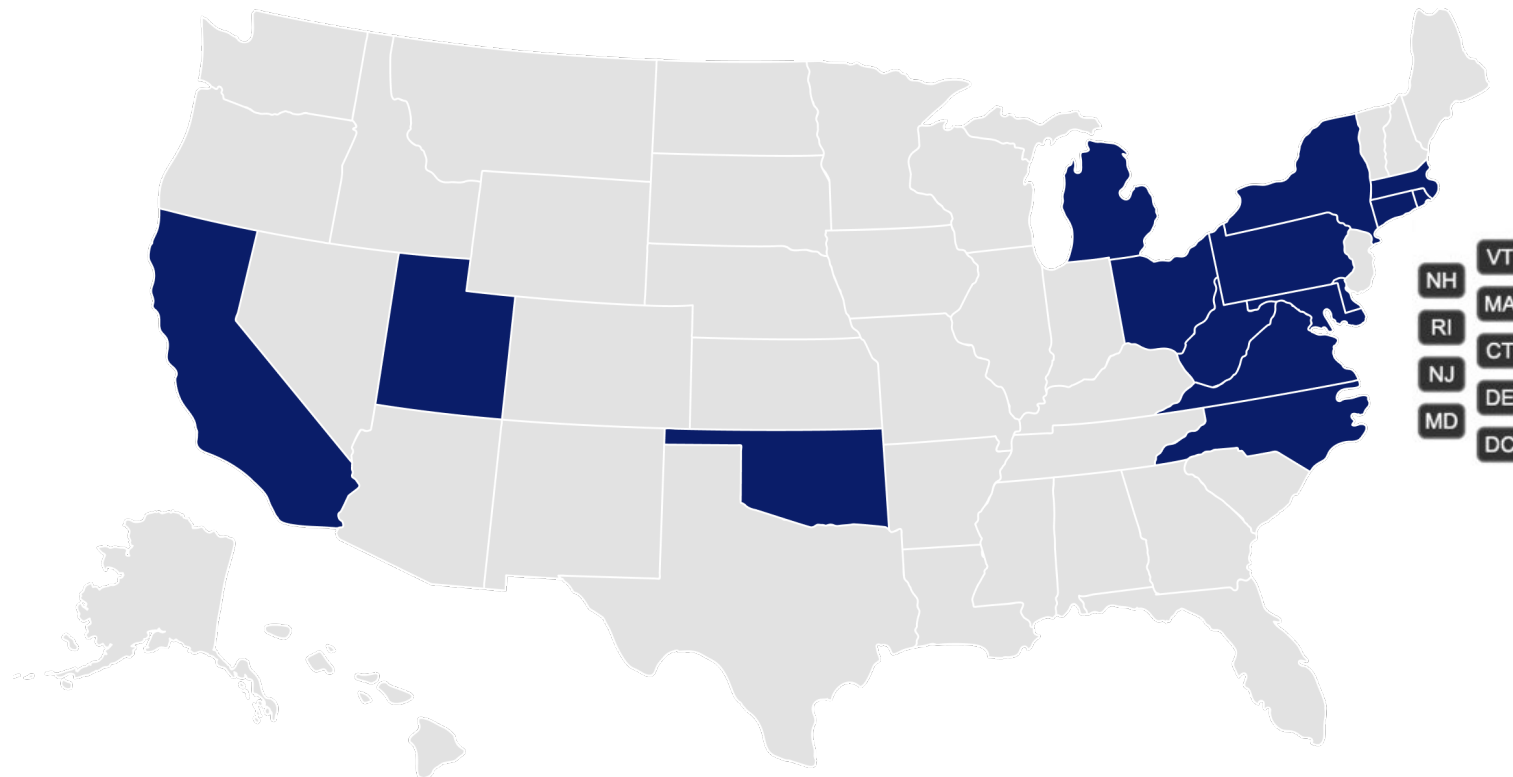


32 Agencies Require a Label



- Requires law labels for new and secondhand products
- Requires law labels for new products
- Requires law labels for secondhand products

15 Agencies Require Licensing





Basics of Law Labels

Background

Requirements

Sections of a Law Label

Filling Terminology

Verifying Registration



Basics of Law Labels

Background

- Purpose: Inform customers of hidden contents inside bedding and furniture items
- Initiated from concerns of highly flammable materials being used as stuffing in bedding and furniture products
- Required by 31 states, each state with its own set of varying product and label requirements
- Uniform Law Labels are possible!



Basics of Law Labels

Requirements

- Must be affixed to the product (sewn in) and visible at the point of sale.
- If the product is inside of a box/bag and the label is not visible, an image of the label needs to be printed on the packaging in full scale.
- Image of law label available for online sales
- Must be made of durable, non-tearable material that will not flake or abrade



6 Sections of a Law Label



1. Under Penalty of Law Statement

**UNDER PENALTY OF LAW
THIS TAG NOT TO BE REMOVED
EXCEPT BY THE CONSUMER**

**ALL NEW MATERIAL
consisting of**

3. URN Number

Example: PA 12345 (CN)

REG. NO.

Certification is made by the manufacturer that the materials in this article are described in accordance with law.

2. Filling Material

4. Certification Statement

5. Company Information

MADE BY

6. Other Information

Date of Delivery.....

Fin. Size:

Net Wt. of Filling Mat'l:

FEDERAL REQUIREMENT: RN

Covering:

MADE IN

Basics of Law Labels

Filling Terminology

- All hidden materials must be disclosed on the law label in order of predominance. This is determined by the percentage of each filling material of the total weight.
- Proper terminology is given IABFLO's Classification of Filling Materials – this is the most comprehensive list that will be accepted by most states
- Configuration of filling material as a disclosure of content is required by 7 states (i.e. pad, batting)



Law Labels & Registration

What's the connection?

URN – registered to correct manufacturing facility & registered in all regulating states

Name and address matches licenses exactly

MADE FOR – supported by proper licensing

Country of Origin matches suffix of URN



Your Turn!

What's can you find wrong with this label?

UNDER PENALTY OF LAW THIS TAG NOT TO BE REMOVED EXCEPT BY THE CONSUMER
ALL NEW MATERIAL consisting of POLYESTER FIBER.....100%
REG. NO. PA 12345 (CN)
Certification is made by the manufacturer that the materials in this article are described in accordance with law.
MADE BY ABC FACTORY 1234 Hollywood Blvd. Beverly Hills, CA 90210 (714) 867-5309 (ask for Jenny)
Date of Delivery Machine wash cold, tumble dry low. Remove immediately. MADE IN CHINA



Your Turn!

What's can you find wrong with this label?

1. Missing a **BOLD** statement

3. Care instructions not permitted

UNDER PENALTY OF LAW THIS TAG NOT TO BE REMOVED EXCEPT BY THE CONSUMER
ALL NEW MATERIAL consisting of POLYESTER FIBER.....100%
REG. NO. PA 12345 (CN)
Certification is made by the manufacturer that the materials in this article are described in accordance with law.
MADE BY ABC FACTORY 1234 Hollywood Blvd. Beverly Hills, CA 90210 (714) 867-5309 (ask for Jenny)
Date of Delivery Machine wash cold, tumble dry low. Remove immediately. MADE IN CHINA

2. Contact information not permitted





It's *also* all about the licensing.

Basics of URNs

Types of registration





Basics of URNs

What is a URN

URN Issuing License



Basics of URNs

What is a URN

- Unique identifiers that link a product back to the facility where it was physically manufactured.
- URN must always be assigned to the manufacturing site.
- Issued per facility – even if the facilities are owned by a parent-company/have the same name/etc.



Basics of URNs

What is a URN

Prefix: state that issued URN

Numbers: unique identifier (4 or more digits)

Suffix: country or state where the manufacturer is located

RI 12346 MX



Basics of URNs

URN Issuing license

- URN-issuing license dictates the manufacturer's name and address for:
 - all affiliated state licenses
 - the law label (unless importer licensing exists)
- Name/address changes must first occur with the URN issuing state





Types of Registration

Manufacturer

Importer

Joint



Types of Registration

Manufacturer

- Minimum requirement for stuffed article compliance.
- URN registered only to the manufacturing facility.
- Manufacturer may use this URN for ANY (filled) product they manufacture at their facility.



Types of Registration

Importer

- 8 agencies require importer registration
- Required for any company that is importing/distributing/selling stuffed articles in the U.S.
- Does not provide a URN.
- Provides authorization to be printed on the law labels of the products in lieu of the factory.



Types of Registration

Importer

Blanket importer licenses: one license covers the company as an importer no matter how many factories/URNs they work with.

URN-specific importer licenses: the company must hold an importer license for each factory/URN they work with.

Stuffed toys have a few caveats.



Types of Registration

Joint

- Importer registers with the manufacturer as the co-holder of a URN.
- Provides an exclusive URN that the manufacturer can only use on the law labels of products they manufacture for that importer.
- 3 states offer joint licenses.



Your Turn!

- A URN can be issued to an importer/distributor. True or **False**.
- How many states issue a **joint** license?



Your Turn!

- A URN can be issued to an importer/distributor. True or **False**.
- How many states issue a **joint** license? **3**.



Your Turn!

- A URN can be issued to an importer/distributor. True or **False**.
- How many states issue a **joint** license? **3**.
- An importer must hold a license in every state regulating their products. True or False?



Your Turn!

- A URN can be issued to an importer/distributor. True or **False**.
- How many states issue a **joint** license? **3**.
- An importer must hold a license in every state regulating their products. True or **False**.

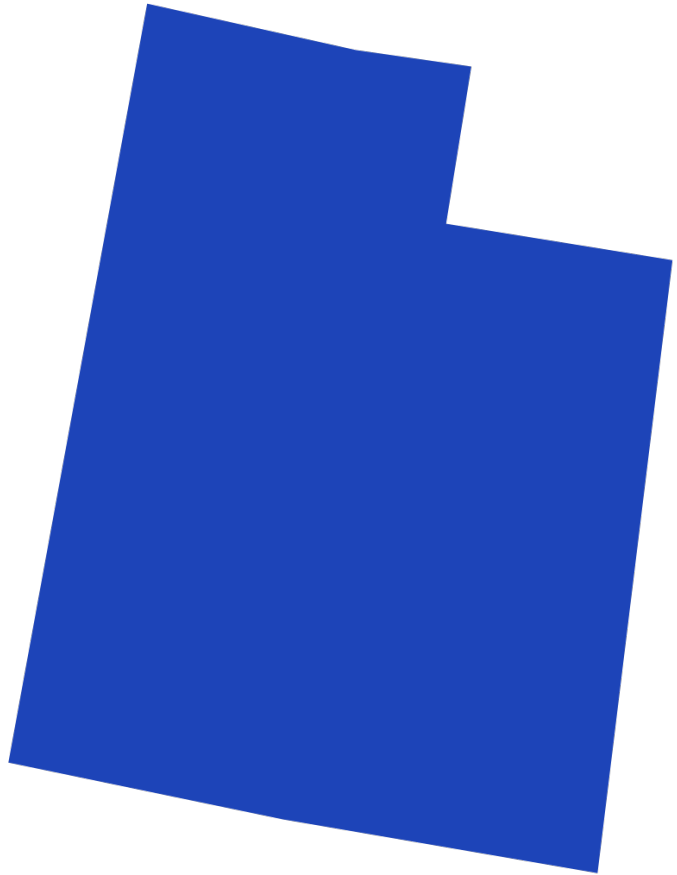


Recent & Upcoming Changes



American
LAW LABEL, INC.





Recent & Upcoming - Utah

- Utah clarified code specific to stuffed articles (passed in Spring 2023)
- New level of "retailer" responsibility
- Products made for sale online must have a law label *easily accessible prior* to purchase
- Enforcement effective 1/1/2024





Recent & Upcoming - Washington, DC

- Program becoming active effective 8/1/23
- Manufacturer and retailer licensing
- Bi-annual license periods
- Currently refining code to reflect similar requirements to California and Utah
- Updates will be provided as they are available





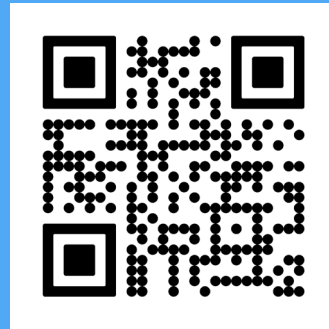
Upcoming - California

- Proposing changes similar to Utah's
- Currently refining with plans to implement within a similar timeframe
- Updates will be provided as they are available



THANK YOU!

Stay Updated + Free
Label Audit:



American
LAW LABEL, INC.



globalrsinc.com
americanlawlabel.com