



## Canada approves the issuance of revised regulations for the Consumer Product Safety Act (Surface Coating Materials) SOR/2022-122

On June 22, 2022, Health Canada issued regulation SOR/2022-122, approving the revision of the regulatory requirements for surface coating materials in the Canadian Consumer Product Safety Act (CCPSA), which will take effect on December 19, 2022. Since December 19, 2022, the surface coating materials of the following products shall meet the requirements of SOR/2022-122:

a)All furniture	b)Children's products	c)Pencils
d)Artist brushes	e)Baby stroller	f)Toys
g)Cribs, Cradles and Bassinets	h)Playpens	l)Expansion gates and expandable enclosures

The amendments to the regulations mainly include the following:

- (a) expanding the meaning of a surface coating material to include surface coating materials that do not “dry” on application, such as powder coatings that are applied electrostatically;
- (b) expanding the application for other decorative coating materials that may be applied to products during manufacture to include materials such as stickers or films;
- (c) expanding the 90 mg/kg total lead limit for applied coating materials to all furniture, not only furniture that are considered children’s products;
- (d) limiting the restrictions on lead, mercury and certain other harmful elements in coating materials applied to parts of products that are accessible;
- (e) removing an outdated test method for certain harmful elements in applied coating materials;
- (f) requiring testing to be done in accordance with a method that conforms to good laboratory practices;
- (g) ensuring consistency across CCPSA regulations.



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The regulation affects many products, and the relevant regulations of CCPSA will be updated in a consistent manner, including:

## 1. SOR/2016-193 《Surface Coating Materials Regulations》

a. Revise the definitions of the terms "surface coating material" and "accessible parts":

- "surface coating material" means a paint or other similar material, with or without pigment, that forms a solid film after it is applied to a surface and that can be removed;
- "accessible parts" means any part of a product that may be touched, licked, mouthed or swallowed during the reasonably foreseeable use of the product.

b. Revise the product application scope of total lead (90mg/kg):

- Furniture (expanded from children's furniture to all furniture);
- Children's products;
- Pencils;
- Artist brushes.

2. Infant and child product regulations include the following:

- SOR/2011-17 《Toys Regulations》
- SOR/2016-152 《Cribs, Cradles and Bassinets Regulations》
- SOR/2016-179 《Expansion Gates and Expandable Enclosures Regulations》
- SOR/2018-186 《Playpens Regulations》

The amendments are as follows:

a. The definitions of "surface coating materials" and "accessible parts" are updated, the same as SOR/2016-193 regulations on surface coating materials;

b. For products within the scope of the above regulations, the surface coating materials on accessible parts shall not exceed the following limits:

- Total lead  $\leq 90$  mg/kg;
- Migration of antimony, arsenic, cadmium, selenium or barium compounds  $\leq 1000$  mg/kg;
- Total mercury  $\leq 10$  mg/kg.

c. Delete the outdated hydrochloric acid test parameters specified to measure the migration of any compounds of antimony, arsenic, cadmium, selenium or barium, and allow the use of the test methods



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commonly used in the industry for the United States, the European Union or other jurisdictions, such as ASTM F963, EN 71-3, ISO 8124-3.

Original link : <https://canadagazette.gc.ca/rp-pr/p2/2022/2022-06-22/html/sor-dors122-eng.html#fn2>

## HCT SOLUTION :

HCT reminds that if the products exported to the Canadian market (especially baby products, furniture, etc.) involve surface coating materials, they should control the raw materials and supplier in advance (the regulations officially came into force on December 19, 2022) according to the requirements of their regulations, so as to ensure the safe and smooth export of products. HCT has a wide range of testing fields and convenient service channels, which can help enterprises evaluate the special chemicals regulated in products and make your products meet the corresponding national and international organization standards.

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