

SPC&B Update

December 10, 2015 - In This Issue: Vermont Children's Product Reporting Requirement

Vermont Will Require Chemical Reporting for Children's Products



Children's Product Manufacturers Will be Required to Report Chemicals of High Concern in Vermont

Vermont has joined other states such as Washington, by issuing a final rule that will require "manufacturers" of children's products sold in the state to report the use of "chemicals of high concern" to the Vermont Department of Health. While the rule is effective today, the first reports are not required until July 1, 2016.

"Manufacturer" is defined as any person who manufactures children's products sold or offered for sale in Vermont, whose name is affixed to the product, packaging or advertising, or any person who sells a children's product to a retailer in Vermont when the manufacturer does not have a presence in the United States. "Children's products" include clothing, cosmetics, jewelry, childcare articles, toys, and child car seats.

Manufacturers of children's products will be required to report the presence of any chemicals of high concern, as listed by the state of Vermont, if they are intentionally added at a level above a "practical quantification limit" (PQL) or if present as a contaminant in an amount above 100 ppm. The products must be identified in the report by brand and product model.

Vermont's list of chemicals of high concern is available upon request.

For further details on the chemical reporting requirements in Vermont or other states, please contact Gail T. Cumins at gcumins@spcblaw.com, Alli Baron at abaron@spcblaw.com, or Donna Shira at dshira@spcblaw.com, or call us at 212-425-0055.

Sharretts, Paley, Carter & Blauvelt, P.C.
75 Broad Street, 5th Floor
New York, NY 10004
212-425-0055
customs@sharretts-paley.com

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