

Tracking Labels for Children's Products

Effective August 14, 2009, CPSIA requires manufacturers to have a tracking label on any consumer product primarily intended for children twelve and younger. The purpose of tracking label is to establish a mean for identifying the source of children's products in order to improve the safety of such products.

This notice is served to provide Kroger General Merchandise vendors, buyers, product developers and testing facilities a guide on CPSIA requirements of tracking labels for children's products. Kroger private label products must also meet Kroger's requirements as specified in Section 4 of this notice.

1. Covered products:

Consumer products designed or intended primarily for children 12 years of age or younger

2. Label locations:

This tracking information must be permanently supplied on both the <u>retail packaging</u> and <u>on the item itself</u>.

- On product, when practicable, the tracking information shall be permanently marked so that it remains on the product during the useful life of the product.
- On disposable packaging, the tracking information shall be permanent to the extent it is durable enough to reach the consumer.

The requirement for tracking labels on items is to the extent practicable. In <u>the</u> <u>statement of policy</u>, CPSC has provided guidance on circumstances where marking the product itself might not be practicable.

3. Required information on label:

- Manufacturer or private labeler name;
- Location and date of production;
- Cohort information, such as batch or run number or other identifying characteristics;
- Any other information to facilitate ascertaining the specific source of the product.

4. Kroger Private Label Product:

Kroger private label products shall meet all requirements specified in Section 1 through 4. This section specifies and unifies the tracking label content and format on applicable Kroger private label products.

Tracking label for Kroger private label products shall include the following information.



Made in *City, Country* Distributed by: Inter-American Products Production Date: (MM/YY) *UPC number Batch or other unique identifying number*

UPC # is provided by Kroger and batch number or other unique identifying number is provided by the manufacturer.

Tracking labels for packaging are integrated with Kroger private label digital proofs. The acceptable format is available on the following website through the designated printer for private label packaging, Integra Trim.

http://www.integratrim.com/Fred Meyer.html

For those items where it becomes truly impracticable to use a permanent marking on a product, the vendor should order semi-permanent stick-on tracking labels from Integra Trim website, if the use of the stickers is itself practicable.

For any question, please contact Kroger General Merchandise Regulatory Compliance at <u>GMCompliance@kroger.com</u>.

References

CPSIA Statement of Policy http://www.cpsc.gov//PageFiles/126760/sect103policy.pdf

CPSIA FAQ <u>http://www.cpsc.gov/en/Business--Manufacturing/Business-Education/tracking-label/</u>