

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 labels is to establish a means 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 retail packaging and on the item itself.

- 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 the [statement of policy](#), 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, 1014 Vine St., Cincinnati, OH. 45202
- 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.

For those items where it becomes truly impracticable to use a permanent marking on a product or for any additional questions, please contact Kroger General Merchandise Product Integrity and Compliance at GMCompliance@kroger.com.

References

CPSIA Statement of Policy

https://www.cpsc.gov/s3fspublic/pdfs/blk_media_sect103policy.pdf

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

Revision History

Version No.	Issue Date	Effective Date	Revision Summary	Revised by	Approved by
1	07/14/2016	07/14/2016	- Initial distribution		Megan Liu
2	08/06/2019	08/06/2019	- Updated hyperlinks - Updated to full OH address - Removed Integratrim info	Jessica Giffin	Megan Liu
3	12/22/2020	12/22/2020	- Updated to new SOP format	Edward Bird	Megan Liu