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DSW KIDS FOOTWEAR COMPLIANCE GUIDE

Footwear includes: All shoes. Does NOT include socks/hosiery.

TEST SUBJECT	REQUIREMENTS
<u>Total Lead Content- Substrates</u> Testing for lead content of substrates is required for any accessible component part of children's product and applies to all metal and plastic utilized in the product and must be performed per color. Testing is required for zippers, snaps, buttons, sequins, rhinestones, rhine studs, glitter and other similar decorative comments. Must also comply with any reporting requirements.	Comply with: <ul style="list-style-type: none"> • CPSIA – Maximum 100 ppm • California Prop 65 • Illinois Lead Poisoning Prevention Act • Washington Children's Safe Product Act • California's Metal Containing Jewelry Law (for accessories or attachments included with the footwear)
<u>Lead - Painted/Colored Surfaces</u> Testing is required for the total lead content of paint or similar surface coatings. Must also comply with any reporting requirements.	Comply with: <ul style="list-style-type: none"> • CPSIA - Maximum 90 ppm • California Prop 65 • Illinois Lead Poisoning Prevention Act • Washington Children's Safe Product Act
<u>Phthalates</u> Must test for phthalates DEHP, BBP and DBP. Must also comply with any reporting requirements.	Comply with: <ul style="list-style-type: none"> • Maximum 1,000 ppm • California Prop 65 • Washington Children's Safe Product Act
<u>Flammability</u> No testing required <u>unless</u> footwear contains hosiery, or is affixed or an integral part of another garment.	Comply with: <ul style="list-style-type: none"> • 16 CFR 1610
<u>Flame Retardants</u> Must test for TRIS, TCEP, TDCPP. Prohibited under Prop 65.	Comply with: <ul style="list-style-type: none"> • California Prop 65
<u>Cadmium</u> Cadmium must be tested, and may be present in, paint or similar surface coatings, colored plastics (PVC) and metal components. Must also comply with any reporting requirements.	Comply with: <ul style="list-style-type: none"> • California Prop 65 • Washington Children's Safe Product Act

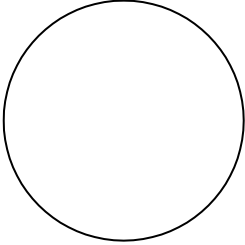
Footwear chart continued following pages.

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<p><u>Small Parts</u> Must test small parts on accessories for (1) attachment strength and (2) size.</p> <p><u>Attachment Strength</u> 15 lbs. minimum at 10 seconds</p> <p><u>Size</u> No parts that can fit into:</p>  <p>1.25"</p>	<p>Comply with:</p> <ul style="list-style-type: none"> • 16 CFR 1501
<p><u>Sharp Points</u> Any object that has a point sharp enough to activate a testing device is considered a "Sharp Point". This includes safety pins, sharp edges on metal hardware, hook and loop tape (velcro), zipper teeth, zipper stops and embellishments, etc.</p>	<p>Comply with:</p> <ul style="list-style-type: none"> • 16 CFR 1500.48 • 16 CFR 1500.49
<p><u>Sharp Edges</u> Tacks & nails, sharp edges on metal hardware, hook & loop tape (velcro) zipper teeth, zipper stops embellishments, etc.</p>	<p>Comply with:</p> <ul style="list-style-type: none"> • 16 CFR 1500.48 • 16 CFR 1500.49

Footwear chart continued following page.



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<p><u>Tracking Label</u> Tracking label information is required to be permanently affixed to the product to the extent practical. Must contain:</p> <ul style="list-style-type: none"> • Manufacturer or private labeler name; • Location and date of production of the product; • Detailed information on the manufacturing process, such as a batch or run number, or other identifying characteristics; and • Any other information to facilitate ascertaining the specific source of the product. <p><u>Closed Toe Shoes</u> – Permanent ink stamp on heel counter</p> <p><u>Sandals</u> – Adhesive sticker</p>	<p>Comply with:</p> <ul style="list-style-type: none"> • CPSIA • 16 CFR 500 <i>et seq.</i> (<i>Fair Packaging and Labeling Act</i>)
<p><u>Children's Product Certificate (CPC)</u> Must issue a CPC based on passing test results which address all consumer product safety rules, standards, regulations or bans that apply to the product for use by a child. An accredited third-party lab must be utilized for this testing.</p>	<p>Comply with:</p> <ul style="list-style-type: none"> • CPSIA

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