

Consumers comprise a subpopulation of particular concern to EPA, the Consumer Products Safety Commission (CPSC), and other governmental and non-governmental organizations. Information from submitters about whether the chemical substances they manufacture are used in consumer products is useful in estimating the potential risks to consumers that result from chemical exposures. In the absence of more specific data, EPA often assumes for risk screening purposes that large, unprotected populations may potentially be exposed to the chemical substances in consumer products. EPA is also working with industry and other stakeholders to develop hazard, exposure, and risk assessments regarding chemicals to which children are exposed. The commercial and consumer product information that will be reported under IURA will be used by EPA in the identification of chemicals that might be included in these programs, and may contribute to exposure assessments for these chemicals.

i. *Commercial and consumer product categories (§ 710.52(c)(4)(ii)(A) of the regulatory text).* Submitters must report up to 10 categories that best describe the commercial and consumer products in which the reportable chemical substance is used (whether the recipient site(s) are controlled by the submitter site or not). If more than 10 categories apply, submitters need only report the 10 categories for the chemical substance

that cumulatively represent the largest percentage of the submitter's production volume, measured by weight. The commercial and consumer product (CCP) categories are listed at § 710.52(c)(4)(ii)(A) of the regulatory text. Information on the use of chemicals in CCPs is useful in estimating the frequency and duration of chemical substance exposures. In the absence of other information, consumers are often assumed to experience less controlled, but less frequent exposures than workers. The data that will be obtained under IURA will enable EPA to make more realistic characterizations of exposure, instead of "worst case," overly conservative assumptions.

ii. *Products intended for use by children (§ 710.52(c)(4)(ii)(B) of the regulatory text).* Submitters must indicate, within each reported CCP category, whether, based on readily obtainable information, any amount of each reportable chemical substance manufactured by the submitter is or is not present in (for example, a plasticizer chemical used to make pacifiers) or on (for example, as a component in the paint on a toy) any products intended for use by children, regardless of the concentration of the substance, or indicate that such information is not readily obtainable.

EPA defines "intended for use by children" in § 710.43 of the regulatory text and in Unit II.F.6.h. Using this definition, if a submitter determines, based on readily obtainable information,

that its chemical substance or mixture is used in or on a product that is intended to be used by children age 14 or younger, the submitter would indicate this on Form U. For example, EPA believes that certain products, like crayons, coloring books, diapers, and toy cars – to name a few – are typically intended to be used by children age 14 or younger. As such, if a submitter determines, based on readily obtainable information, that its chemical substance or mixture is used in crayons and toy cars, that submitter would report a "Y" in the Children's Use column on Form U for categories C01 and C10.

On the other hand, EPA believes that certain products, like household cleaning products, automotive products, and lubricants--to name a few--are typically not intended to be used by children age 14 or younger. As such, if a submitter determines, based on readily obtainable information, that its chemical substance or mixture is used in automotive care products and lubricants, that submitter could report a "N" in the Children's Use column on Form U for categories C03 and C09.

For further illustration, some examples of products that are typically intended for use by children 14 or younger are provided for each commercial and consumer use category (this listing is not intended to be exhaustive and should therefore not be considered limiting):

Code	Category	Examples of Children's Products
C01	Artists' supplies	Crayons, children's markers
C02	Adhesives and sealants	Craft glue, model glue
C03	Automotive care products	Typically products in this category are not likely to be intended for use by children 14 or younger
C04	Electrical and electronic products	Electronic games, remote control cars, toys
C05	Glass and ceramic products	Porcelain dolls
C06	Fabrics, textiles and apparel	Pajamas
C07	Lawn and garden products (non-pesticidal)	Lawn and gardening tools designed specifically for children, e.g., children's rake
C08	Leather products	Shoes, jackets, baseball gloves
C09	Lubricants, greases and fuel additives	Typically products in this category are not likely to be intended for use by children 14 or younger
C10	Metal products	Toy trucks, toy cars, wagon
C11	Paper products	Diapers, baby wipes, coloring books
C12	Paints and coatings	Finger paints, water color kits intended for children's use