

Code	Category	Examples of Children's Products
C13	Photographic chemicals	Typically products in this category are not likely to be intended for use by children 14 or younger
C14	Polishes and sanitation goods	Typically products in this category are not likely to be intended for use by children 14 or younger
C15	Rubber and plastic products	Pacifiers, action figures, balls
C16	Soaps and detergents	Baby shampoo, children's bubble bath
C17	Transportation products	Child's car seat
C18	Wood and wood furniture	Baby cribs, changing tables, wooden toys
C19	Other	Other items specifically intended for use by children age 14 or younger

EPA chose the phrase "intended for use by children" because it appears in the Federal Hazardous Substances Act (FHSA) (15 U.S.C. 1261 *et seq.*) and has been applied by the Consumer Product Safety Commission (CPSC) for over 20 years. While not specifically defined in FHSA or its implementing regulations, the CPSC regulations list several factors that CPSC considers in determining whether a product is a "children's product" intended for use by children (16 CFR 1501.2(b)). After consultation with CPSC, EPA adapted these factors for the purpose of defining "intended for use by children" for IURA purposes.

EPA based the ages for the definition, i.e., 14 or younger, on the Standard Consumer Safety Specification on Toy Safety issued by the American Society for Testing and Materials (ASTM), Standard: ASTM F963-96a. This standard covers age groups through 14 years and defines "toy" as: "any object designed, manufactured, or marketed as a plaything for children through the age of 14 years" (Ref. 17, section 3.1.33).

Obtaining information indicating that a chemical substance or mixture is used in a product that is intended for use by children will enable the Agency and others to identify chemicals affecting this particularly sensitive population. EPA has long had an interest in protecting children from unreasonable adverse effects associated with exposure to chemicals. In 1995, EPA established a policy to ensure that environmental health risks of children are explicitly and consistently evaluated in our risk assessments, risk characterizations, and environmental and public health standards (see <http://yosemite.epa.gov/ochp/ochpweb.nsf/homepage>). Environmental health threats to children are often difficult to recognize and assess because of limited information to identify where children's

exposures occur and limited understanding of when and why children's exposures and responses are different from those of adults.

In 1997, Executive Order 13045, entitled *Protection of Children from Environmental Health Risks and Safety Risks* (62 FR 19885, April 23, 1997), specifically directed each Federal agency to make it a high priority to identify, assess, and address children's environmental health and safety risks. It also created a Task Force on Environmental Health Risks and Safety Risks to Children. On October 9, 2001, President Bush signed Executive Order 13229, entitled *Amendment to Executive Order 13045, Extending the Task Force on Environmental Health Risks and Safety Risks to Children* (66 FR 52013, October 11, 2001), extending the work of the Task Force by another 18 months. These Executive Orders illustrate the interest in and the importance placed on addressing children's environmental health and safety risks.

The inclusion of the children's use category in IURA will provide the Agency and others with valuable information about the relationship between the IUR chemicals and products intended for use by children 14 or younger. This information will allow the Agency to respond to concerns about chemicals used in the manufacture of products intended for use by children, enabling the Agency to identify those chemicals that are reported as not being used in children's products, those chemicals that are used in children's products, and those chemicals where it is not known if they are used in children's products. This initial screen will then allow EPA and others to identify those chemicals used in children's products that might warrant further investigation or

assessment, and thereby allow EPA, as well as other interested parties and affected entities, to better prioritize such assessments and maximize available resources.

iii. *Percentage of production volume attributable to each commercial and consumer product category* (§ 710.52(c)(4)(ii)(C) of the regulatory text). Submitters must estimate the percentage of their site production volume for each reportable chemical substance that is attributable to each specific commercial and consumer end-use. This information must be submitted to the extent that it is readily obtainable. Estimates must be rounded off to the nearest 10% of production volume. However, a CCP category which accounts for 5% or less of the total production volume of a reportable chemical substance cannot be rounded off to zero percent if the production volume attributable to that CCP category is greater than or equal to 300,000 lbs. In such cases, submitters must report the percentage of production volume attributable to that CCP category to the nearest 1% of production volume. This exception to the general rounding rule will ensure that adequate use information is reported for the larger production volume chemical substances.

The total percent production volumes reported may add up to more than 100%, given that the submitter is reporting on distribution of a chemical to sites in its control as well as downstream sites, some of which are not immediate purchasers from the original manufacturing site. Additionally, the total percent production volume may add up to less than 100% if the submitter cannot readily obtain information about how all of its production volume is used in commercial and consumer products.