



16 CFR 1632 Update: New 2020 Interim Enforcement Policy for Mattresses and Mattress Pads Announcement Effective June 8, 2020

The CPSC Office of Compliance has issued a revision to the current Interim policy for Mattress and Mattress Pads (16 CFR 1632).

Background Information

During the interim policy the required SRM 1196 (Standard Reference Material) cigarette was unavailable or in limited supply for testing of mattresses and mattress pads. There have been several Interim Enforcement policies issued over the past years as follows:

- Originally in May 2006, the CPSC issued the Interim Enforcement Policy for Mattresses, to allow a reduced number of testing surfaces from six surface to two surfaces. This action did not include Mattress Pads since the new policy addressed open flame testing for mattress sets, but not mattress pads.
- In 2008, the production of the cigarettes that met the specifications stopped.
- In 2011, the CPSC amended the standard to require the use of SRM 1196 cigarettes which were defined by the ignition strength of previously specified unfiltered cigarettes. When the supply of cigarettes was critically low, the CPSC issued another Interim Enforcement Policy for Mattress Pads to allow manufacturers of Mattress pads to reduce testing surfaces from six to two surfaces to evaluate compliance to the 16 CFR 1632.
- Eventually on December 21, 2018, the Updated Interim Enforcement Policy for Mattress and Mattress Pads was changed to allow commercially available cigarettes that met the ignition strength requirements of the law due to lack of access for the specified SRM 1196 cigarettes.

Current Status

The National Institute of Standards and Technology has confirmed and is now able to sell the new SRM replacement cigarettes, known as SRM 1196a, that is very similar to the original SRM 1196 cigarette. Test labs are now able to purchase these for full testing to the Federal Standard. The CPSC is issuing a new 2020 Enforcement Policy for Mattress and Mattress Pads Subject to 16 CFR 1632. This will supersede *Interim Enforcement Policy for Mattresses Subject to 16 CFR Parts 1632 and 1633, May 15, 2006*, the *Interim Enforcement Policy for Mattress Pads Subject to 16 CFR part 1632, November 1, 2018* and *Updated Interim Enforcement Policy for Mattresses and Mattress Pads Subject to 16 CFR Part 1632, December 21, 2018*.

The new CPSC 2020 Interim Enforcement Policy states that the following is required:

- Only SRM 1196 or SRM 1196a, not a combination thereof, must be used to evaluate a specimen.
- The commercially available, fire-standard cigarettes, identified in the *Updated Interim Enforcement Policy for Mattresses and Mattress Pads* issued in December 2018, will no longer be permitted for testing.
- CPSC is rescinding enforcement discretion identified in previous Interim Enforcement Policies and will not require a test to be repeated if a cigarette extinguishes before burning the full length (16 CFR § 1632 (d)(iii)).
- CPSC is rescinding the use of opened cigarette packages of SRM 1196 cigarettes.
- CPSC is allowing the testing of 2 mattress surfaces for new mattress prototypes using the specified SRM 1196 or SRM 1196a cigarettes.
- Effective date: June 8, 2020 and will remain in effect until further notice.

Reference: https://cpsc.gov/s3fs-public/2020-Interim-Enforcement-Policy-for-Mattresses-and-Mattress-Pads-Final_0.pdf?GDW9AEW9GBkv.qPAj77.LXQaLFhF.ul

How Does this Impact You? Contact Us to Discuss

If you have any questions about these proposed revisions, please contact your customer service representative or email: cps.info@bureauveritas.com

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