

U.S. Consumer Product Safety Commission



This presentation has not been reviewed or approved by the Commission and
may not reflect its views

**Safety Standard for
Cigarette Lighters
Title 16, Code of Federal Regulations,
Part 1210 (16 C.F.R. Part 1210)**

**Matthew Lee
Compliance Officer
Office of Compliance and Field Operations**

Topics of Discussion

- Purpose of the Safety Standard
- Scope of the Safety Standard
- Definition of Lighters
- Requirements for Cigarette Lighters
- Qualification Testing
- Production Testing
- Recordkeeping and Reporting
- Labeling Requirements
- Certification Requirements

Purpose of the Standard

- To reduce the risk of fire-related death and injury associated with young children playing with cigarette lighters.
- CPSC data demonstrate that lighters pose an unreasonable risk of death and injury to consumers if they do not comply with the standard.

Purpose of the Standard

Effectiveness of the Safety Standard for Cigarette Lighters (16 C.F.R. Part 1210)

CPSC studies show that

- Cigarette lighter fires started by children younger than 5 were
 - 48% in the post-standard studies
 - 71% in the pre-standard studies
- The implementation of the safety standard suggests a 58% reduction in cigarette fires started by children under age 5., saving 100 lives in 1998 alone.

Purpose of the Standard

Estimated 1998 cigarette lighter child play fire losses prevented by the CPSC standard

Case	Fire	Deaths	Injuries	Property loss (\$millions)	Total societal cost (\$millions)
Actual 1998 fire losses	2400	70	480	38.2	412.2
1998 expected fire losses if the standard were not in effect	5700	170	1140	90.7	979.0
1998 Fire losses prevented	3300	100	660	52.5	566.8

Scope of the Standard

Lighters subject to the standard include:

- Disposable
- Novelty
- Manufactured or imported into the United States of America after July 12, 1994

Definition of Lighters

Disposable Lighter [16 C.F.R. §1210.2(b)]
means a lighter that either is:

- not refillable with fuel or
- uses a gaseous fuel (butane, propane, etc.) under pressure, AND has a Customs value or ex-factory price under \$2.25 (adjusted every 5 years)

Definition of Lighters

Novelty Lighter [16 C.F.R. §1210.2(d)] means a lighter that:

- has entertaining audio or visual effects appealing to children under 5 years of age, or
- depicts or resembles in physical form or function articles commonly recognized as appealing to or intended for use by children under 5 years of age.

Novelty Lighters

- A novelty lighter may operate on any fuel, including gas (butane, propane, etc.) or liquid fuel.

Novelty Lighter Examples



Novelty Lighter Examples



Novelty Lighter Examples



Novelty Lighter Examples



Requirements for Cigarette Lighters

- 16 C.F.R. §1210.3

- (a) Lighters subject to the standard shall be resistant to successful operation by at least 85% of the child-test panel when tested in the manner prescribed by §1210.4 , Test Protocol.

Requirements for Cigarette Lighters

- 16 C.F.R. §1210.3

(b) The mechanism or system of a lighter that makes the product child resistant must:

- Reset itself automatically after each operation of the ignition mechanism
- Not impair safe operation of the lighter when used in a normal & convenient manner
- Be effective for the life of the lighter
- Not be easily overridden or deactivated

Qualification Testing

To ensure that all cigarette lighters comply with the safety standard:

- Surrogate lighters of each model must be tested in accordance with the Test Protocol for Qualification Test specified in 16 C.F.R. §1210.4
- A second model that differs from the first model only by differences that would not have an *adverse* effect on child resistance need not be tested
- However, the second model must still be reported to the CPSC at least 30 days before it is imported.

Qualification Testing

A surrogate lighter

- Approximates the appearance, size, weight, and shape of an actual lighter
- Does not have fuel
- Must also be identical to the actual lighter in all characteristics that might affect child resistance
- Produces a sound or visual signal operated in a manner that would have caused the actual lighter to light

Qualification Testing

- Ensure that the surrogate lighters used for qualification testing are described in a written product specification.
- All operating characteristics of the surrogates must be measured and recorded before and after the child-panel test.
- Critical operating characteristics include, but not limited to :
 - √ The force required to move a component
 - √ The manufacturing tolerances
 - √ Any other components that could affect child resistance.

Qualification Testing

- Each test must use one or two panels of 100 children.
- Each panel of 100 must be 2/3 male and 1/3 female, as outlined in the regulation.
- Children in the panel must:
 - √ Live in the United States
 - √ Have no illness
 - √ Be between 42 and 51 months of age on the day of the test
 - √ Have parent or guardian sign Informed Consent Form

Qualification Testing

- Every detail of the test is specified in the protocol, including:
 - √ The number of boys and girls in each age group tested
 - √ The number of surrogates, testers and test sites
 - √ How many children may be tested at each site
 - √ How many children a tester may test
 - √ How many children must test each surrogate
 - √ And exactly what is said to the children during the test
- Review the test protocol carefully to make sure that you comply with ALL of the testing requirements.

Qualification Testing

- Two children at a time are tested.
- Any child who does not try to operate the surrogate must be eliminated from the panel and replaced by an eligible child.
- For a lighter to pass, at least 85% of the children tested must be unable to operate the surrogate lighter.

Evaluation of Test Results

Test panel	Cumulative Number of Children	Successful Lighter Operations		
		Pass	Continue	Fail
1	100	0-10	11-18	19 or more
1	200	11-30	NA	31 or more

Qualification Testing

- A child may participate in only one cigarette lighter panel and one multi-purpose lighter panel in his or her lifetime.
- No child may participate in more than one child-resistance test panel on a given day.

Production Testing

- Test samples of lighters to demonstrate that the lighters meet the specifications, required under §1210.15.
- Keep the production test interval short enough to assure that all other lighters manufactured during the interval meet the standard.
- Take corrective action if any test results indicate that any lighters in a production interval may not meet the standard.
- Keep production test records and results until at least 3 years after the date of testing.

Recordkeeping and Reporting

- Manufacturers and importers of cigarette lighters must maintain the following records:
 - √ Records of qualification testing
 - √ Records of procedures used for production testing
 - √ Records of production testing
 - √ Records of specifications

Recordkeeping and Reporting

- Qualification test records and production test procedures must be kept for 3 years after production of that model ceases.
- Records must be kept in the United States and provided to the Commission within 48 hours of the receipt of a request.

Recordkeeping and Reporting

- Manufacturers and each importer individually must provide a written report to CPSC's Office of Compliance at least 30 days before importing into, or distributing in, the United States any model of lighter subject to the standard.

Recordkeeping and Reporting

The written report should include:

- Name, address, and principal place of business
- Description of the lighter model and the child-resistant features
- Description of qualification testing
- Identification of the place(s) where the lighters are made
- Location(s) where records are kept
- A prototype or production unit of the lighter model

Recordkeeping and Reporting

- Written specifications must be kept for any component that may affect child resistance and include, but not be limited to:
 - √ Force requirements
 - √ Manufacturing tolerances
 - √ Size, shape and dimensions
 - √ Any other information or features that may affect child resistance

Recordkeeping and Reporting

The report required by 16 C.F.R.
§1210.17(b) should be sent to:

Lighters

U.S. Consumer Product Safety Commission
Office of Compliance and Field Operations
4330 East West Highway
Bethesda, MD 20814-4408

Recordkeeping and Reporting

- Successful submission reports typically include:
 - Pre- and post-test measurements of all features that affect operation of the surrogates
 - How the measurements were made

Recordkeeping and Reporting

Submission reports should avoid

- Missing or incomplete measurements of the surrogates
- Missing or incomplete specifications for production lighters
- Production specifications that differ from measurements of the surrogates
- Inaccurate description of the lighter's child-resistant features
- Incorrect child test procedures
- Missing informed consent forms and data records

Labeling Requirements

- The standard requires that each unit of disposable or novelty lighter must be labeled with (1) an identification of the manufacturing time period, not to exceed 31 days, during which the lighter was made, and (2) an identification of the manufacturer of the lighter.
- Either, or both, of the above may be placed on the lighter in code.

Certification Requirements

- Certification that the lighters sold comply with the standard.
- Certification must be based on a reasonable testing program of lighters.

Certification Requirements

- Manufacturer or importer must issue a Certificate of Compliance to accompany each shipping unit of lighters, which includes:
 - “Complies with the Consumer Product Safety Standard for Cigarette Lighters”
 - The name and address of the manufacturer or importer issuing the certificate or the private labeler, and
 - The date(s) of manufacture
 - 16 CFR Part 1110

Certification Requirements

- Manufacturer or importer must also comply with the General Certification of Conformity (GCC) requirement as specified by the CPSIA (16 C.F.R. §1110.11), which includes:
 - Identification of the product covered by the certificate
 - Citation to each CPSC product safety regulation to which the product is being certified
 - Identification of the U.S. importer or domestic manufacturer certifying compliance of the product
 - Contact information for the individual maintaining records of test results

Certification Requirements

- Manufacturer or importer must also comply with the General Certification of Conformity (GCC) requirement as specified by the CPSIA (16 C.F.R. §1110.11), which includes:
 - Date and place where the product was manufactured:
 - Date and place where the product was tested for compliance with the regulation(s) cited above
 - Identification of any third-party laboratory on whose testing the certificate depends
 - Manufacturers and importers may combine the General Certification of Conformity certificate with the Certificate of Compliance.

Questions?

**Office of Compliance and Field
Operations**

Matthew Lee
Compliance Officer
MLee@cpssc.gov