



# Information for Regulated Parties Regarding the *Consumer Products Containing Lead Regulations*

January 26, 2022

---

## Introduction

This document provides information about the safety requirements set out in the *Consumer Products Containing Lead Regulations* (CPCLR) under the *Canada Consumer Product Safety Act* (CCPSA) for consumer products manufactured, imported, advertised or sold in Canada. This document may be updated from time to time.

Any person who manufactures, imports, advertises, sells or tests a consumer product must comply with all applicable prohibitions and requirements of the CCPSA and its regulations. For example, the CCPSA sets out prohibitions with respect to consumer products that are a danger to human health or safety (paragraphs 7(a) and 8(a)).

The CPCLR set out requirements that limit the lead content in accessible parts of certain consumer products. In addition to these regulations, restrictions on lead content in consumer products are set out in several regulations under the CCPSA, such as the *Children's Jewellery Regulations*, the *Surface Coating Materials Regulations*, the *Toys Regulations*, and the *Glazed Ceramics and Glassware Regulations*.

For more information on legislative requirements for the safety of consumer products, refer to the CCPSA and the **Information resources** section of this document.

The general information provided in this document is not intended to provide legal advice regarding the interpretation or application of the CCPSA and its associated regulations. It is provided for informational purposes only and should not be relied upon as technical or legal advice applicable to specific situations. In the case of any discrepancy between the general information in this document and the Act or regulations, the Act and regulations will prevail. Please note that other federal, provincial, territorial and municipal laws may also regulate consumer products or their use. Information about these laws may be obtained by contacting the relevant jurisdiction directly.

## Current requirements set out in the *Consumer Products Containing Lead Regulations*

In 2018, the *Consumer Products Containing Lead (Contact with Mouth) Regulations* were repealed and replaced by the *Consumer Products Containing Lead Regulations* (CPCLR). Section 2 of the CPCLR requires that lead content not exceed 90 mg/kg in each accessible part of the following five categories of consumer products.

- a) “a product that is brought into contact with the user’s mouth during normal use, **except for**
- i. a kitchen utensil, or
  - ii. a product that is subject to the *Glazed Ceramics and Glassware Regulations*.”

Some examples of consumer products that are within the scope of paragraph 1(a) of the CPCLR include:

- Pacifiers and teethers
- Sports mouthpieces and mouth guards
- Drinking aids, including straws and parts of bottles, sippy cups, and other drinking vessels that are in contact with the user’s mouth during normal use
- Mouthpieces of vaping devices, and mouthpieces of cannabis accessories.

- b) “any clothing or clothing accessory that is intended for use by a child under 14 years of age.”

Some examples of consumer products, where they are intended for use by a child under 14 years of age, that are within the scope of paragraph 1(b) of the CPCLR include:

- Sleepwear
- Daywear
- Jackets
- Boots and shoes
- Neck ties
- Hats and bonnets
- Belts and suspenders
- Gloves and muffs
- Shawls and scarves
- Lanyards, socks, and stockings
- Buttons and other attachments.

- c) “a product that is intended for use in learning or play (a toy) by a child under 14 years of age.”

Some examples of consumer products, where they are intended for use by a child under 14 years of age, that are within the scope of paragraph 1(c) of the CPCLR include:

- Rattles
- Squeeze toys
- Toy figurines
- Building blocks
- Children's role playing products (such as doctor/nurse kits, doll strollers and cooking equipment)
- Products intended to be used for learning purposes, such as pencils, erasers, and rulers.

- d) "a book or similar printed product that is intended for a child under 14 years of age, **except if it is:**
- i. printed on paper or cardboard, and
  - ii. printed and bound in a conventional manner using conventional materials."

**Both conditions must be met** for the exception to apply.

Some examples of consumer products, where they are intended for use by a child under 14 years of age, that are within the scope of paragraph 1(d) of the CPCLR include: books made of materials such as vinyl, textile, plastic, or metal.

- e) "a product whose primary purpose is to facilitate the relaxation, sleep, hygiene, carrying or transportation of a child under four years of age."

Some examples of consumer products, where they are intended for use by a child under four years of age, that are within the scope of paragraph 1(e) of the CPCLR include:

- Cribs, cradles, and bassinets
- Strollers
- High chairs
- Baby swings
- Baby carriers
- Car seats
- Changing tables
- Child care articles such as: pacifiers and teethingers, bibs, and bath accessories.

**Note:** An accessible part is defined in the CPCLR as "any part of a product that may be touched, licked, mouthed, or swallowed during the reasonably foreseeable use of the product". Reasonably foreseeable use includes normal wear and tear.

## Exceptions

“Each accessible part may contain more than 90 mg/kg of lead if:

- a) lead is necessary to produce an essential characteristic of the part;
- b) no alternative part containing less lead is available; and
- c) the part, when tested in accordance with good laboratory practices, does not release more than 90 mg/kg of lead.”

**All three conditions must be met** for the exception to apply.

## Test Methods

Industry is responsible for making sure the consumer products they supply to the Canadian market comply with the CPCLR. Health Canada does not specify or recommend particular analytical methods to test consumer products for total lead content. However, the CPCLR specify that tests must be carried out using good laboratory practices, in accordance with the principles set out in the Organisation for Economic Co-operation and Development (OECD) *Principles of Good Laboratory Practice, Number 1* of the *OECD Series on Principles of Good Laboratory Practice and Compliance Monitoring*, ENV/MC/CHEM(98)17<sup>1</sup>.

Health Canada uses several test methods to determine total lead in consumer products to verify compliance with the CPCLR. For a list of methods, please visit:

<https://www.canada.ca/en/health-canada/services/consumer-product-safety/product-safety-testing/chemistry-methods.html>.

To obtain a copy of Health Canada’s test methods for lead in consumer products, please email Health Canada at [CCPSA-LCSPC@HC-SC.GC.CA](mailto:CCPSA-LCSPC@HC-SC.GC.CA).

## Information resources

If you require additional information, visit the resources below or contact a Health Canada Consumer Product Safety Office via email ([CCPSA-LCSPC@HC-SC.GC.CA](mailto:CCPSA-LCSPC@HC-SC.GC.CA)) or telephone at 1-866-662-0666 (toll-free within Canada and the United States).

- *Canada Consumer Product Safety Act* (CCPSA)  
<https://laws-lois.justice.gc.ca/eng/acts/C-1.68/index.html>

---

1

[http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=env/mc/chem\(98\)17&doclanguage=en](http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=env/mc/chem(98)17&doclanguage=en)

- *Consumer Products Containing Lead Regulations (CPCLR)*  
<https://laws-lois.justice.gc.ca/eng/regulations/SOR-2018-83/index.html>
- *Canada Consumer Product Safety Act Quick Reference Guide*  
<https://www.canada.ca/en/health-canada/services/consumer-product-safety/reports-publications/industry-professionals/canada-consumer-product-safety-act-guide.html>
- Industry Guide on Mandatory Reporting under the *Canada Consumer Product Safety Act* - Section 14 "Duties in the Event of an Incident"  
<https://www.canada.ca/en/health-canada/services/consumer-product-safety/legislation-guidelines/acts-regulations/canada-consumer-product-safety-act/industry/guide-mandatory-reporting-section-14.html>
- To subscribe for email updates about the *Canada Consumer Product Safety Act*  
<https://www.canada.ca/en/health-canada/services/consumer-product-safety/legislation-guidelines/acts-regulations/canada-consumer-product-safety-act/subscribe.html>