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# REGULATORY GUIDELINES

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Vendor Guide

LAST UPDATE –JULY 30, 2018  
URBAN OUTFITTERS, INC.  
5000 S. Broad Street Philadelphia, PA 19112

## OVERVIEW

Urban Outfitters, Inc. (URBN) is committed to ensuring that all products sold to its customers are of the highest quality and meet all applicable U.S. regulatory standards as well as any additional URBN requirements. To ensure that these standards are met, URBN has developed a regulatory compliance program for its vendors to follow.

URBN vendors are responsible for ensuring that their products are in compliance with all applicable regulations at the federal, state or local level in the market where the products will be sold. This regulatory guide provides a high-level overview of the main product categories carried by URBN and the regulations that apply. However, the vendor has ultimate responsibility for ensuring the product complies with the most current regulations. ***If a product is not included in this document, it does not mean it is exempt from regulations and/or testing.***

## GENERAL COMPLIANCE REQUIREMENTS

- All products must be compliant with applicable requirements **prior to shipment**. A Consumer Product Safety Commission (CPSC) required certificate must be completed prior to shipment for products covered by CPSC-enforced regulations. See below for details of this requirement.
- Re-ordered products must be re-tested if the manufacturing process, materials, and/or actual manufacturer have changed. If no changes have occurred, the product must be re-tested every year. The vendor is responsible for ensuring all testing is up-to-date.
- “Collections” consisting of multiple products/styles that are made from the **same exact materials** may be tested using one of the representative samples, rather than testing all pieces of the collection. However, if colors or materials vary across the collection, each piece must be tested.
- The vendor must cover all testing costs, including the costs of samples and their delivery to an accredited testing laboratory. Most tests are destructive; therefore, samples will not be returned unless specifically requested.
- URBN will refuse delivery of any product that has failed a federal or state mandated test.

## RECOMMENDED TESTING LABS

Testing should be completed at an accredited testing lab. The following labs are approved and recommended by URBN –

- SGS - <http://www.sgs.com/>
- Intertek - <http://www.intertek.com/>
- TÜV SÜD- [https://www.tuv-sud.com/home\\_com](https://www.tuv-sud.com/home_com)
- Bureau Veritas – <http://www.bureauveritas.com/>
- UL - <https://www.ul.com/>

## CPSIA - REQUIREMENTS & CERTIFICATES

As required by the Consumer Product Safety Improvement Act of 2008 (CPSIA), manufacturers and importers of **certain general use products** (non-children's products) for which consumer product safety rules apply, must certify, in a written General Certificate of Conformity (GCC) based on testing or a reasonable testing program, that their products comply with those applicable rules. Manufacturers and importers of **children's products** must certify, in a written Children's Product Certificate (CPC) based on test results from a CPSC-accepted laboratory, that their children's products comply with applicable children's product safety requirements. The certificate must be completed in English and must contain all required information.

All vendors are required to complete, and retain for a minimum of 5 years, a GCC and/or CPC for in-scope products being shipped to URBN. These certificates should accompany the shipments of the goods and must be made available to URBN within 24 hours of request.

Products that are covered by a CPSC-enforced regulation include **but are not limited to**:

- Adult Wearing Apparel
- Carpets and Rugs
- Furniture
- Children's Apparel and Sleepwear
- Children's Products

It is the responsibility of the vendor, not URBN, to determine whether a product is covered by a CPSC-enforced regulation and/or requires a GCC/CPC. Additionally, it is the vendor's responsibility to determine the contents of the applicable certificate. Vendors can find more information on GCC and CPC requirements on the [cpsc.gov](http://cpsc.gov) website.

### **Domestic Orders**

Domestic vendors (or vendors acting as their own importers of record) must email all certificates to [cpSC@urbanout.com](mailto:cpSC@urbanout.com) prior to shipment.

- Style number & PO # should be referenced in the subject line.

### **Orders for which URBN is acting as Importer of Record**

When URBN is acting as importer of record, vendor must submit certificates (and test reports when applicable) with shipping documents. The information below may be used on the GCC:

**Importer Name:** Urban Outfitters, Inc.

**Full Mailing Address:** 5000 S. Broad Street, Philadelphia, PA 19112

**Phone Number:** 215-454-5500

**Name of Individual Maintaining Test Results:** Lysie Reese

**Full Mailing Address:** 5000 S. Broad Street, Philadelphia, PA 19112

**Email:** [lreese@urban.com](mailto:lreese@urban.com)

**Phone Number:** 215-454-3724

## VENDOR RESPONSIBILITY

- Vendors are responsible for ensuring products comply with all applicable regulations, regardless of whether or not they are listed in this document. Vendors should monitor any regulations applicable to their product and stay up-to-date with changes or updates to the regulation.
- If product fails required testing, or does not meet a standard, vendor/manufacturer must work with URBN on resolution & next steps.
  - *Vendors may NOT ship products until resolution is determined.*
- Any required labeling must be accurate and complete, and durably attached to product.
  - *Correct labeling must be present on TOP sample.*
- Vendors are responsible for all testing costs.
- Vendor must ensure that all product has been re-tested any time there are changes in materials, manufacturing processes, or actual manufacturer. If no changes have occurred, re-testing must occur at least once per year, while the product is being sold by URBN.
- All vendors producing goods that are covered by a CPSC regulation must complete a General Certificate of Conformity and/or Children's Product Certificate prior to a PO being shipped. Certificate templates are available on [www.urbnvendor.com](http://www.urbnvendor.com).
  - **When URBN is acting as importer of record, vendor should submit certificates (and test reports when applicable) with shipping documents.**
  - **Domestic vendors (or vendors acting as their own importers of record) should email all certificates to [cpsc@urbanout.com](mailto:cpsc@urbanout.com) prior to shipment.**
    - Style number & PO # should be referenced in the subject line.
- Products not covered by a CPSC regulation may be covered by another federal, state or local regulation and must be compliant. Vendors must be able to provide proof of compliance to URBN (i.e. - certificates and/or passing test reports) upon request.

## GLOSSARY

**Market Vendor:** A vendor who is selling its existing product to URBN, and is not working with the URBN production team to develop a new style/product.

**Market Private Label Vendor:** A vendor who is attaching an URBN branded labels onto their existing product. They are not working with the URBN production team to create a new style.

**Ownbrand Vendor:** A vendor who is working directly with the URBN production team to develop styles/products. All products will have URBN brand names attached.

## ALL PRODUCTS

There are certain requirements that are applicable to ALL products sold to URBN. Please see below for the requirements that apply to all product categories. These requirements must be adhered to, **in addition to** the requirements specific to each product category.

Requirement	Details (standard, test method, etc.)
Proposition 65 & Restricted Substances in US, EU and Canada	All products must be in compliance with California's Prop 65 requirements, as well as URBN's Restricted Substances List. <b>Reference Prop 65/Restricted Substances section below for specific details.</b>
Country of Origin Labeling	<p>All products must be labeled with the Country of Origin. This must be a durably affixed marking.</p> <ul style="list-style-type: none"> <li>• Apparel, home textile, and textile accessories: Durable markings include but are not limited to imprints and durably affixed hangtags. Markings should not be affixed to the polybags or to the URBN price tags and/or label.</li> <li>• Home products and accessories (non-textile): Durable markings include but are not limited to, imprints, self- adhesive labels, and durably affixed hangtags. Markings should not be affixed to the polybags or to the URBN price tags and/or label. Footwear markings must be affixed to the shoe and not placed on the shoebox</li> </ul>
Toxic Elements in Packaging	All products must be in compliance with the Toxic Elements in Packaging requirements and vendor must be able to submit a certificate of compliance upon request.

## RESTRICTED SUBSTANCES LIST (RSL)

All products being shipped to URBN must not include the below listed chemicals above the specified levels. It is recommended that product is tested prior to shipping, to confirm compliance with these requirements. If a product contains one of these substances in a concentration higher than what is allowed, the product **cannot** be shipped.

**The RSL applies to every product category, including trims & findings on apparel.**

### How To Read the RSL –

1. Identify the materials used in your product, and locate them across the top row in the first table, “Restricted Substance Test Plan – By Material” (pages 5-7)
2. Scroll through the table to see which restricted substances (listed in the far-left column) will apply to your materials. If there is a “●” in box, it indicates that this material has a compliance requirement for that restricted substance.
3. In the second table, “Regulatory Requirements for Restricted Substances US, Canada, Europe” (pages 8-12), you will find the limits for each restricted substance that was identified as being applicable to your product/materials. **Products shipped to URBN must comply with these limits.**

### Restricted Substance Test Plan – By Material

Test Item	Plastics and Synthetic Materials - PU, PVC, Rubber, TPU, TPR, EVA	Textiles - Natural Fibers	Textiles - Synthetic Fibers	Paint / Coating/ Surface Prints – With hand feeling or scrapable; Eg. Plastisol print, etc	Leather	Synthetic Leather PU, PVC	Metal parts	Adhesives (Upon Request & for raw material)
Alkylphenols & Alkylphenol Ethoxylates (NP, OP, NPEO, OPEO) – per materials	●	●	●	●	●	●		●
Azo Dyes– per color		●	●	●	●	●		
Chromium VI – per material					●			
Dimethyl fumarate – per material	●	●	●		●	●		
Disperse dyes– per color			●	●		●		

Test Item	Plastics and Synthetic Materials - PU, PVC, Rubber, TPU, TPR, EVA	Textiles - Natural Fibers	Textiles - Synthetic Fibers	Paint / Coating/ Surface Prints – With hand feeling or scrapable; Eg. Plastisol print, etc	Leather	Synthetic Leather PU, PVC	Metal parts	Adhesives (Upon Request & for raw material)
Brominated Flame Retardants [8 items- TDCPP, PBB, TRIS, TEPA, PentaBDE, OctaBDE, Deca BDE, Bis(2,3-dibromopropyl) phosphate) ] – per material (Required if sample treated with flame retardant only)	●	●	●			●		
Formaldehyde – per material			●	●	●	●		●
Nickel release – per material: direct and prolonged skin contact							●	
Organotin Compounds (TBT/ TPHT) – per material	●	●	●	●	●	●		●
Polycyclic Aromatic Hydrocarbons (PAHs) per material	●			●				
Perfluorooctane Sulfonates (PFOS) – per material (Required if sample declared with functional finishing)	●	●	●		●	●		
Phthalates –per material	●			●		●		●
Short Chain Chlorinated Paraffins (SCCP's) per material	●			●	●	●		●
Lead - per color	●			●	●	●	●	●

Test Item	Plastics and Synthetic Materials - PU, PVC, Rubber, TPU, TPR, EVA	Textiles - Natural Fibers	Textiles - Synthetic Fibers	Paint / Coating/ Surface Prints – With hand feeling or scrapable; Eg. Plastisol print, etc	Leather	Synthetic Leather PU, PVC	Metal parts	Adhesives (Upon Request & for raw material)
Total Cadmium – per color	●			●	●	●	●	●
Chlorinated phenols (PCP)- per material		●	●	●	●	●		
Pesticides – per materials		●			●	●		
Navy Blue		●	●	●		●		
Candidate List Substances	●	●	●	●	●	●	●	
Heavy Metals in Packaging	●	●	●	●	●	●	●	



## Regulatory Requirements for Restricted Substances US, Canada, Europe

Test Items	Test Methods	Maximum Limit - Children's Product	Maximum Limit - Adult's Product
Lead in Substrate	<p>Method (non-metallic materials): CPSC Test Method: CPSC-CH-E1002-08.3 'Standard Operation Procedure for Determining Total Lead (Pb) in Non-Metal Children Product'</p> <p>Method (metal materials): CPSC Test Method: CPSC-CH-E1001-08.3 'Standard Operating Procedure for Determining Total Lead (Pb) in Children's Metal Products (Including Children's Metal Jewelry)'.</p>	40 mg/kg	<p><b><u>Clothing</u></b> (made of PVC, Neoprene, &amp; / or Plastic materials), Gloves: ≤ 30 mg/kg lead in fabric of products</p> <p><b><u>Apparel Components</u></b> (For component that may be handled, touched or mouthed): 100 mg/kg</p> <p><b><u>Footwear and Personal carrying Products</u></b> (Any Component &amp; Any Material): 100 mg/kg</p> <p><b><u>Belts</u></b> (Any Component &amp; Any Material): 50mg/kg</p> <p><b><u>Jewelry</u></b> ≤100 mg/kg Exemptions: Precious metals, Cubic zirconia (cubic zirconium, CZ), glass, rhinestones or vitrified ceramics</p> <p><b>All Others:</b> 100 mg/kg</p>
Lead in Surface Coating	CPSC-CH-E1003-09.1 'Standard Operating Procedure for Determining Lead (Pb) in Paint and Other Similar Surface Coatings'	40 mg/kg	<p><b><u>Belts</u></b> 50mg/kg</p> <p><b><u>All others:</u></b> 90 mg/kg</p>

Test Items	Test Methods	Maximum Limit - Children's Product	Maximum Limit - Adult's Product
Total Cadmium	All Materials: EPA3050B/3051 OR For Plastics: EN 1122; Other than Plastics: Acid Digestion, Followed by AAS/ICP-OES	40 mg/kg	100 mg/kg
Phthalates	CPSC-CH-C1001-09.3	<p><b>Footwear-</b> all materials including inaccessible components</p> <p>DEHP + DBP + BBP + DINP + DIDP + DNOP= max 0.1% by weight</p> <p>DEHP+DBP+BBP= 0.1% (Total) (Any-childcare article up to age 3)</p> <p>DINP+DIDP+DNOP= 0.1% (Total) (Any-childcare article intended for use by a child under 3 years of age if that product can be placed in the child's mouth.)</p>	<p><b>Footwear-</b> all materials including inaccessible components</p> <p>DEHP + DBP + BBP + DINP + DIDP + DNOP= max 0.1% by weight</p> <p><b>All other products:</b> DEHP, BBP, DBP, DIDP, DnHP, DINP - 1000 mg/kg</p>
Azo Dyes	Textile : EN 14362-1: 2012 Leather: ISO 17234-1 Polyester: EN 14362-2: 2012 4-aminoazobenzene: Textile- LFGB § 64 BVL B 82.02.9 EN ISO 17234-2; EN 14362-3: 2012 Leather- ISO/DIS 17234-2	30 mg/kg	30 mg/kg
Navy Blue	DIN54231	0.1% (w/w)	0.1% (w/w)

Test Items	Test Methods	Maximum Limit - Children's Product	Maximum Limit - Adult's Product
Disperse Dyes	DIN 54231	Not detected (5 mg/L)	Not detected (5 mg/L)
Formaldehyde	Textiles: ISO 14184-1 or Leather: ISO/FDIS 17226-1 (by HPLC method) / ISO/FDIS 17226-2 (by UV method)	<b>Infants (0-36 months)</b> – 20 mg/kg <b>&gt;36 months:</b> Direct skin contact – 75 mg/kg Items without direct skin contact – 300 mg/kg	<b>Direct Skin contact:</b> 75 mg/kg <b>Items without direct skin contact</b> – 300 mg/kg
Brominated Flame retardants [9 items- TDCPP, TCEP, PBB, TDBPP, TCPP, PentaBDE, OctaBDE, Deca BDE, HBCDD – Hexabromocyclo dodecane, TBBPA] (Required if sample treated with flame retardant only)	GC-MS/ LC-MS/ KS C IEC 62321 (Penta BDE, OctaBDE) / Self-Regulatory Safety Confirmation Standard Annex 4 (TDBPP)	Use Ban [detection limit = 5 mg/kg (each)]	Use Ban [detection limit = 5 mg/kg (each)]
Short-chain chlorinated paraffins (SCCPs)	GC-MS/ LC-MS	1500 mg/kg	1500 mg/kg
Chromium (VI)	ISO 17075	3 mg/kg	3 mg/kg
Nickel release	Coated item: EN 12472 & EN 1811; Non-coated item: EN 1811	<b>For metal materials with direct and prolonged contact with skin:</b> 0.5 µg/cm <sup>2</sup> /week (Non-body piercing) 0.2 µg/cm <sup>2</sup> /week (Body piercing)	<b>For metal materials with direct and prolonged contact with skin:</b> 0.5 µg/cm <sup>2</sup> /week (Non-body piercing) 0.2 µg/cm <sup>2</sup> /week (Body piercing)

Test Items	Test Methods	Maximum Limit - Children's Product	Maximum Limit - Adult's Product
Perfluorooctane sulfonates (PFOS) (required if sample declared with functional finishing – e.g. grease, stain and water repellence)	In-house method, HPLC-MS analysis	Prohibited	Prohibited
Organotin Compounds	ISO 17353, GC-MS analysis	0.1% of TBT, TPhT, DBT and DOT by wt. of tin	0.1% of TBT, TPhT, DBT and DOT by wt. of tin
Dimethyl fumarate	GC-MS	≤ 0.1 mg/kg	≤ 0.1 mg/kg
Chlorinated phenols (PCP)	ISO 17070 (Leather) / LFGB § 64 BVL B82.02.8 (Textile / Leather)	Prohibited (textiles and leather) ≤ 5mg/kg (wood based materials)	Prohibited (textiles and leather) ≤ 5mg/kg (wood based materials)
Alkylphenols and Alkylphenol Ethoxylates	In-house method Methanol Extraction HPLC-MS	0.01% (100 mg/kg)	0.01% (100 mg/kg)
Pesticides	USEPA Method 8081B, 3620B, 3630C (Refer to Annex I), GC-MS, GC-ECD, GC-NPD & HPLC-DAD-MSD analysis	Not detected	Not detected
Polycyclic Aromatic Hydrocarbons (PAHs) – per material: direct and prolonged skin contact	GC-MS	<b>Childcare articles:</b> ≤ 0.5 mg/kg <b>Clothing, footwear, accessories:</b> ≤ 1 mg/kg	<b>Clothing, footwear, accessories:</b> ≤ 1 mg/kg
Heavy Metals in Packaging	EPA 3050B/ 3051	Lead, Cadmium, Mercury, Hexavalent Chromium=	Lead, Cadmium, Mercury, Hexavalent Chromium=

Test Items	Test Methods	Maximum Limit - Children's Product	Maximum Limit - Adult's Product
		< 100 mg/kg individual or in combination	< 100 mg/kg individual or in combination
SVHC Candidate List Substances	Various	0.1% per total weight of article (disclosure requirement)	0.1% per total weight of article (disclosure requirement)
RoHS directive 2011/65/EU (Applies to all electronics sold in the EU, Applies to lighting and electronics with screens in some US states – there are many complicated exceptions)	Various	lead (Pb) 1000 ppm mercury (Hg) 1000 ppm cadmium (Cd) 100 ppm hexavalent chromium (CrVI) 1000 ppm polybrominated biphenyls (PBB) 1000 ppm polybrominated diphenyl ethers (PBDE) 1000 ppm four different phthalates (DEHP, BBP, BBP, DIBP) 1000 ppm each	lead (Pb) 1000 ppm mercury (Hg) 1000 ppm cadmium (Cd) 100 ppm hexavalent chromium (CrVI) 1000 ppm polybrominated biphenyls (PBB) 1000 ppm polybrominated diphenyl ethers (PBDE) 1000 ppm four different phthalates (DEHP, BBP, BBP, DIBP) 1000 ppm each

# **PRODUCT SPECIFIC REQUIREMENTS**

## APPAREL

### SUMMARY

Apparel refers to any article of clothing or costume worn or intended to be worn by individuals. Apparel is included in the scope of the Flammable Fabrics Act and therefore requires flammability testing prior to being imported and/or sold and a completed, CPSC-compliant General Certificate of Conformity (GCC). Some fabrics (and thus articles of clothing) may be exempt from the flammability testing due to fabric type/weight. However, a Certificate of Conformity noting the exemption will still be required by URBN for these articles of clothing. The below section also outlines all product marking requirements required by law and/or URBN.

### REQUIREMENTS

**In addition to testing products for Prop 65 & Restricted Substances**, the following regulatory requirements apply to apparel.

Requirement	Details (standard, test method, etc.)
Flammability Testing	16 CFR 1610 Class 1 or Class 2* textiles can be used in clothing. Class 3 textiles <b>cannot be used</b> in clothing.  *Class 2 textiles – if multiple colorways of the same fabric, all colors must be tested.
Proper Labeling	<ul style="list-style-type: none"> <li>▪ Country of Origin</li> <li>▪ Care Instructions &amp; Care Symbols</li> <li>▪ Fiber Content</li> <li>▪ Importer Identification (RN # and CA #)</li> <li>▪ Product ID (ex: PO #, style #, etc.)</li> <li>▪ Size</li> </ul>

### VENDOR EXPECTATIONS

#### Ownbrand Apparel Vendors

- Vendor must upload CPSC flammability test report (as well as Certificate of Conformity) into Tradestone no later than 30 days prior to shipment of PO.
- Labeling must be accurate and complete, and sewn into garment.
  - ◆ *Correct labeling must be present on TOP.*

#### Market Vendors and Market Private Label Vendors

- Vendor must maintain CPSC flammability test reports and GCC's and furnish to URBN upon request.
  - ◆ *Documents should be maintained for 5 years.*
- Labeling must be accurate and complete, and sewn into garment.
  - ◆ *Correct labeling must be present on TOP.*

## EXCEPTIONS

Urban Renewal purchases recycled, remade or vintage items that may not conform to the Federal Trade Commission (FTC) labeling regulations for country of origin (COO), care and content. URBN will adhere to the FTC guidelines as closely as possible, recognizing that due to the unique nature of the garments, some required information is unobtainable.

- **Recycled Product:** Items that are bought as one item, but reconstructed into another, unique item.
  - Country of Origin should be indicated as the US if the product is being recycled and repurposed by the URBN Renewal team.
  - Care instructions should be determined by the team reconstructing the garments.
  - If fiber content is unknown, must include the following verbiage on the label: "Made from second hand materials; Fiber content unknown".
  - URBN's RN # & CA # must be included on the label.
  
- **Remade Product:** Items produced from rolls of remaindered/surplus fabric.
  - Must be labeled with country of origin, care instructions (determined by the buying team) and URBN's RN # and CA #.
  - If fiber content is unknown, must include the following verbiage on the label: "Made from second hand materials; Fiber content unknown".
  
- **Vintage Product:** One of a kind, pre-owned items that are bought and sold to the consumer "as is".
  - Labels that are included with the garment should not be removed.
  - For items that arrive with missing labels, a sticker will need to be created and applied at the DC level. The sticker should read:
    - *Made from second hand materials. Fiber content unknown.*



## ACCESSORIES & SHOES

### SUMMARY

“Accessories”, for the purpose of this document, includes bags & handbags, cold weather accessories, jewelry, hats, sunglasses, socks & hosiery, as well as shoes. The regulatory requirements for accessories varies based on type of product, and is described in detail below.

### REQUIREMENTS

In addition to testing products for Prop 65 & Restricted Substances, the following regulatory requirements apply to accessories and shoes.

Product	Requirement	Details (standard, test method, etc.)
Bags & Handbags	Proper Labeling	<ul style="list-style-type: none"> <li>▪ Country of Origin</li> <li>▪ Fiber Content – Wool percentages</li> </ul>
Cold Weather Accessories (gloves, mittens, scarves)	Flammability Testing ( <i>applicable to scarves</i> )	16 CFR 1610
	Proper Labeling	<ul style="list-style-type: none"> <li>▪ Country of Origin</li> <li>▪ Care Instructions &amp; Care Symbols</li> <li>▪ Fiber Content</li> <li>▪ Importer Identification (RN # and CA #)</li> </ul>
Hats	Proper Labeling	<ul style="list-style-type: none"> <li>▪ Country of Origin</li> <li>▪ Fiber Content</li> <li>▪ Importer Identification (RN # and CA #)</li> <li>▪ Care Instructions &amp; Care Symbols</li> </ul>
Jewelry ( <i>Adult Only; Children’s Jewelry – see Children’s Products section below</i> )	Proper Labeling	Country of Origin
Shoes	Proper Labeling	<ul style="list-style-type: none"> <li>▪ Country of Origin</li> <li>▪ Fiber Content – Wool percentages</li> <li>▪ Material content of the upper, the lining and insole sock, and the outer-sole</li> <li>▪ Size</li> </ul>
Socks/Hosiery	Flammability Testing	16 CFR 1610
	Proper Labeling*  <i>*Can be marked on the package rather than sewn into the socks/hosiery</i>	<ul style="list-style-type: none"> <li>▪ Country of Origin*</li> <li>▪ Care Instructions &amp; Care Symbols</li> <li>▪ Fiber Content</li> <li>▪ Size</li> <li>▪ RN # and CA #</li> </ul> <p><b>*For Socks - Label must appear on the front of the package or label with the country of origin. This mark must be placed adjacent to the size designation.</b></p>
Sunglasses (adult, non-prescription) ( <i>continued below</i> )	Lens Impact Resistance	21 CFR 801.410(c)(3)

Sunglasses (adult, non-prescription) (continued)	Proper Labeling	<ul style="list-style-type: none"> <li>▪ Country of Origin</li> <li>▪ Power of Strength, if applicable</li> </ul>
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## EXCEPTIONS

Urban Renewal purchases recycled, remade or vintage items that may not conform to the Federal Trade Commission (FTC) labeling regulations for country of origin (COO), care and content. URBN will adhere to the FTC guidelines as closely as possible, recognizing that due to the unique nature of the garments, some required information is unobtainable.

- **Recycled Product:** Items that are bought as one item, but reconstructed into another, unique item.
  - Country of Origin should be indicated as the US if the product is being recycled and repurposed by the URBN Renewal team.
  - Care instructions should be determined by the team reconstructing the garments.
  - If fiber content is unknown, must include the following verbiage on the label: "Made from second hand materials; Fiber content unknown".
  - URBN's RN # & CA # must be included on the label.
- **Remade Product:** Items produced from rolls of remaindered/surplus fabric.
  - Must be labeled with country of origin, care instructions (determined by the buying team) and URBN's RN # and CA #.
  - If fiber content is unknown, must include the following verbiage on the label: "Made from second hand materials; Fiber content unknown".
- **Vintage Product:** One of a kind, pre-owned items that are bought and sold to the consumer "as is".
  - Labels that are included with the garment should not be removed.
  - For items that arrive with missing labels, a sticker will need to be created and applied at the DC level. The sticker should read:
    - *Made from second hand materials. Fiber content unknown.*

## HOME PRODUCTS

### SUMMARY

Home Products include all home textiles (carpets, sheets, towels, etc.) as well as hard goods (furniture, décor, candles, other home accessories). The table below describes in detail the tests or requirements for each specific product category.

### REQUIREMENTS

**In addition to testing products for Prop 65 & Restricted Substances**, the following regulatory requirements apply to home products.

Product	Requirement	Details (standard, test method, standard, etc.)
Bathmats	Flammability Testing	16 CFR 1631 <i>Include flammability labeling when applicable.</i>
	Proper Labeling	<ul style="list-style-type: none"> <li>▪ Country of Origin</li> <li>▪ Fiber Content</li> <li>▪ Care Instructions</li> <li>▪ RN # and CA #</li> </ul>
Bed & Bath Textiles: sheets, blankets, pillowcases, shams, bed skirts, duvet covers, coverlets, shower curtains, towels, washcloths	Flammability Testing	Blankets: ASTM D4151 Other types of bed/bath textiles: ASTM D1230
	Proper Labeling	<ul style="list-style-type: none"> <li>▪ Fiber Content</li> <li>▪ Country of Origin</li> <li>▪ Care Instructions</li> <li>▪ Importer Identification (RN # and CA #)</li> </ul>
Bedding Containing Filling (comforters, quilts, mattress pads, etc.)  *Children's Bedding – see Children's Products section below for requirements	Flammability Testing	Comforters, quilts - ASTM D1230 Mattress pads - 16 CFR Part 1632
	Proper Labeling	<ul style="list-style-type: none"> <li>▪ Fiber Content</li> <li>▪ Country of Origin</li> <li>▪ Care Instructions</li> <li>▪ Importer Identification (RN # and CA #)</li> </ul>
	Law Label	Uniform Law Label <i>Registration required in certain states</i>

Pillows <i>*If down/feather stuffed, please reference Down/Feather Stuffed Product (above)</i>	Law Label	Uniform Law Label <i>Registration required in certain states &amp; Canadian provinces</i>
	Flammability Testing	ASTM D1230 (Class I)
	Proper Labeling	<ul style="list-style-type: none"> <li>• Country of Origin</li> <li>• Care Instructions &amp; Care Symbols</li> <li>• Fiber Content</li> <li>• Importer Identification (RN # and CA #)</li> </ul> Product ID (ex : PO #, style #, etc.)
Table Linens (tablecloths, napkins, placemats)	Flammability Testing	ASTM D1230
	Proper Labeling	<ul style="list-style-type: none"> <li>▪ Country of Origin</li> <li>▪ Fiber Content</li> <li>▪ Care Instructions</li> <li>▪ Importer Identification (RN # and CA #)</li> </ul>
Oven Mitts/Pot Holders	Heat Transfer	Use lab's in-house test method Temperature change should not be greater than 30 degrees Celsius after 10 seconds
	Proper Labeling	<ul style="list-style-type: none"> <li>▪ Country of Origin</li> <li>▪ Fiber Content</li> <li>▪ Care Instructions</li> </ul>
Aprons <i>*Children's Aprons must also comply with Children's Product requirements (see below)</i>	Flammability Testing	16 CFR 1610 Class 1 or Class 2 textiles can be used in clothing. Class 3 textiles <b>cannot be used</b> in clothing.
	Proper Labeling	<ul style="list-style-type: none"> <li>▪ Country of Origin</li> <li>▪ Care Instructions &amp; Care Symbols</li> <li>▪ Fiber Content</li> <li>▪ Importer Identification (RN # and CA #)</li> <li>▪ Product ID (ex: PO #, style #, etc.)</li> <li>▪ Size (if applicable)</li> </ul>
Carpets and Rugs ( <i>continued below</i> )	Flammability Testing	16 CFR 1630 or 16 CFR 1631 <i>Include flammability labeling for small rugs when applicable.</i>

Carpets and Rugs (continued)	Proper Labeling	<ul style="list-style-type: none"> <li>▪ Country of Origin</li> <li>▪ Fiber Content</li> <li>▪ Care Instructions</li> <li>▪ Importer Identification (RN # and CA #)</li> <li>▪ <i>Flammability labeling for small rugs when applicable</i></li> </ul>
Window Curtains/Drapes	Flammability	US - ASTM D1230
Down/Feather Stuffed Products	<ul style="list-style-type: none"> <li>▪ Content Analysis</li> <li>▪ Fat &amp; Oil</li> <li>▪ Cleanliness- Oxygen Number</li> <li>▪ Fill Power</li> <li>▪ Turbidity</li> <li>▪ Species Identification</li> </ul>	<ul style="list-style-type: none"> <li>▪ IDFB part 3</li> <li>▪ IDFB part 4</li> <li>▪ IDFB part 7</li> <li>▪ IDFB part 10</li> <li>▪ IDFB part 11A</li> <li>▪ IDFB part 12</li> </ul>
	Law Label for Stuffed Products	Uniform Law Label <i>Registration required in certain states &amp; Canadian provinces</i>
	Proper Labeling	<ul style="list-style-type: none"> <li>▪ Country of Origin</li> <li>▪ Fiber Content</li> <li>▪ Care Instructions</li> <li>▪ Importer Identification (RN # and CA #)</li> </ul>
Furniture (free-standing chests, bookcases, dressers, bedframes, armoires, tables) <i>(continued below)</i>	CARB/EPA Formaldehyde Emissions from Composite Wood Products (when applicable)	ASTM E 1333-96(2002) (large chamber test method) <i>Secondary Method - ASTM D 6007-02</i> URBN will accept documentation/certification of compliance of the finished product or the composite wood components.
	Total lead content in surface coatings 16 CFR 1303	All accessible surface coatings in the as received state shall not contain lead or lead components in which the lead content is in excess of 0.009% (90ppm) of the weight of the total content.
	CARB/EPA Formaldehyde Labeling <i>Applicable to products containing composite wood</i>	Label must include: 1. Manufacturer's name. 2. Product lot number or batch produced. 3. CARB assigned number for the third-party certifier. No third-party certifier number is required if the products were made using no-added formaldehyde (NAF) and certain ultra-low-emitting formaldehyde (ULEF) based resins. 4. A statement of compliance to denote that the composite wood product complies with the requirements of the ATCM.

<p><i>Furniture (free-standing chests, bookcases, dressers, bedframes, armoires, tables) (continued)</i></p>	<p>Anti-Tip Warning Label <i>Applicable to any case goods over 30 inches tall</i></p>	<p>ASTM F2057-09 sections 3.4 – 3.6</p>
<p>Furniture (upholstered/stuffed) <i>(continued below)</i></p>	<p>CARB/EPA Formaldehyde Emissions from Composite Wood Products (when applicable)</p>	<p>ASTM E 1333-96(2002) (large chamber test method)  <i>Secondary Method - ASTM D 6007-02</i>  URBN will accept documentation/certification of compliance of the finished product or the composite wood components.</p>
	<p>Total lead content in surface coatings 16 CFR 1303</p>	<p>All accessible surface coatings in the as received state shall not contain lead or lead components in which the lead content is in excess of 0.009% (90ppm) of the weight of the total content.</p>
	<p>Packaging: Lead, cadmium, mercury and chromium (VI)</p>	<p>Toxics in Packaging law (Toxics in Packaging Clearinghouse, TPCH) California, Connecticut, Florida, Georgia, Illinois, Iowa, Maine, Maryland, Minnesota, Missouri, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, Virginia, Washington, Wisconsin)</p>
	<p>CARB/EPA Formaldehyde Labeling <i>Applicable to products containing composite wood</i></p>	<p>Label must include:</p> <ol style="list-style-type: none"> <li>1. Manufacturer's name.</li> <li>2. Product lot number or batch produced.</li> <li>3. CARB assigned number for the third-party certifier. No third-party certifier number is required if the products were made using no-added formaldehyde (NAF) and certain ultra-low-emitting formaldehyde (ULEF) based resins.</li> <li>4. A statement of compliance to denote that the composite wood product complies with the requirements of the ATCM.</li> </ol>
	<p>California Business and Professional Code section 19094 Flame retardant chemical content (California market only)</p>	<p>All applicable materials shall subject to following test (regardless the label claim):</p> <ul style="list-style-type: none"> <li>- A Declaration letter to substantiate the non- flame retardant content claim,</li> <li>- The total flame retardant content of all flame retardants in each component of upholstered furniture shall not exceed 1000 ppm.</li> </ul>
	<p>Flammability &amp; Use of Flame Retardants</p>	<p>TB-117-2013 &amp; SB-1019 All upholstered furniture must include the flammability label as well as the additional statement required by SB-1019, indicating whether or not flame retardant chemicals are present.</p>

<i>Furniture (upholstered/stuffed) continued</i>	Law Label	Uniform Law Label <i>Registration required in certain states &amp; Canadian provinces</i>
	Proper Labeling	Country of Origin
<i>Lighting (continued below)</i>	Safety Certification Mark	Product must be tested and certified according to the applicable standards by any Nationally Recognized Testing Laboratory (NRTL) recognized by OSHA. The safety mark must be validated.
	PVC Coated Wires and Cables	EPA 3050 / EPA 7420 Surface contact layer of cords must contain less than or equal to 0.03% (300 ppm) lead. Warning label must be affixed or printed on product or to unit package.
	Formaldehyde Emissions from Composite Wood Products (when applicable)	ASTM E 1333-96(2002) (large chamber test method) <i>Secondary Method - ASTM D 6007-02</i> URBN will accept documentation/certification of compliance of the finished product or the composite wood components.
	CARB Formaldehyde Labeling <i>Applicable to products containing composite wood</i>	Label must include: 1. Manufacturer's name. 2. Product lot number or batch produced. 3. CARB assigned number for the third-party certifier. No third-party certifier number is required if the products were made using no-added formaldehyde (NAF) and certain ultra-low-emitting formaldehyde (ULEF) based resins. 4. A statement of compliance to denote that the composite wood product complies with the requirements of the ATCM.
	FTC Labeling Requirements	16 CFR 305.2 and 305.3  The FTC Lighting Facts label and principal display panel information must appear on packaging for most general service "lamps" with medium screw bases. That includes most incandescent, compact fluorescent (CFL), and light emitting diode (LED) light bulbs.

<i>Lighting (continued)</i>	US FCC Rules (when applicable)	Products should have valid FCC report if operating frequency > 9 kHz for AC, or operating frequency > 1.705 MHz for battery operated product.
	US FCC Marking & Instruction (when applicable)	Products should have FCC required marking and instruction if operating frequency > 9 kHz for AC, or operating frequency > 1.705 MHz for battery operated product.
	CEC Requirements	All applicable products must comply with California's Energy Commission
	DOE Requirements	All lighting must comply with Department of Energy standards
	Proper Labeling	Country of Origin
Food Contact Products (Glassware, plastics, ceramics) <i>(continued below)</i>	Leachable Cadmium and Lead from Product Interior (for ceramics)	Food contact ceramics must meet the requirements described in US FDA CPG 7117.06 and 7117.07
	Leachable Lead from Silver Plated Hollowware	Food contact silver plated hollowware must meet requirements described in US FDA CPG 7117.05
	Food Contact Plastic and Polymeric Coating	Food contact plastic material must comply with FDA requirements. 21 CFR 175; 21 CFR 177; 21 CFR 180.22; 21 CFR 181.32 (per plastic type)
	Food Contact Paper or Paperboard	Food contact paper or paperboard material must comply with FDA requirements. 21 CFR 176.170



<i>Food Contact Products (Glassware, plastics, ceramics) (continued)</i>	Bisphenol-A Content	<p>The following products may not contain any detectable levels of BPA:</p> <ul style="list-style-type: none"> <li>-all reusable/disposable food or beverage containers (includes lids and cups)</li> <li>-Straws</li> </ul>
	Proper Labeling and Documentation	<ul style="list-style-type: none"> <li>• Country of Origin</li> <li>• If item is microwave or dishwasher safe, proper labeling and documentation is required.</li> <li>• California tableware law - any glazed ceramic, enamel metal ware, or pewter article, container, or utensil that may be used in the preparation, serving, or storage of food or drink must be indelibly marked with the name of the manufacturer or importer responsible for the sale of the tableware in California.</li> </ul>
<i>Candles and Candle Accessories (continued below)</i>	Cautionary Labeling	ASTM F 2058
	Standard Specification for Fire Safety for Candles	ASTM F 2417
	Standard Specification for Fire Safety for Candle Accessories	ASTM F 2601
	Standard Specification for Heat Strength of Glass Containers	ASTM F-2179
	Formaldehyde Emissions from Composite Wood Products (when applicable)	<p>ASTM E 1333-96(2002) (large chamber test method) <i>Secondary Method - ASTM D 6007-02</i></p> <p>URBN will accept documentation/certification of compliance of the finished product or the composite wood components.</p>
	CARB Formaldehyde Labeling <i>Applicable to products containing composite wood</i>	<p>Label must include:</p> <ol style="list-style-type: none"> <li>1. Manufacturer's name.</li> <li>2. Product lot number or batch produced.</li> <li>3. CARB assigned number for the third-party certifier.</li> </ol> <p>No third-party certifier number is required if the products were made using no-added formaldehyde (NAF) and certain ultra-low-emitting formaldehyde (ULEF) based resins.</p>

Candles and Candle Accessories (continued)		4. A statement of compliance to denote that the composite wood product complies with the requirements of the ATCM.
	Proper Labeling	Country of Origin
Mirrors	Formaldehyde Emissions from Composite Wood Products (when applicable)	ASTM E 1333-96(2002) (large chamber test method) <i>Secondary Method - ASTM D 6007-02</i> URBN will accept documentation/certification of compliance of the finished product or the composite wood components.
	CARB Formaldehyde Labeling <i>Applicable to products containing composite wood</i>	Label must include: 1. Manufacturer's name. 2. Product lot number or batch produced. 3. CARB assigned number for the third-party certifier. No third-party certifier number is required if the products were made using no-added formaldehyde (NAF) and certain ultra-low-emitting formaldehyde (ULEF) based resins. 4. A statement of compliance to denote that the composite wood product complies with the requirements of the ATCM.
	Proper Labeling	Country of Origin
Handheld/Portable Electronics (items that can be plugged into the wall and/or contain batteries)	Safety Certification Mark	Product must be tested and certified according to the applicable standards by any Nationally Recognized Testing Laboratory (NRTL) recognized by OSHA. The safety mark must be validated.
	Proper Labeling	Country of Origin
Other home goods (frames, knobs, seasonal décor, etc.) (continued below)	Formaldehyde Emissions from Composite Wood Products (when applicable)	ASTM E 1333-96(2002) (large chamber test method) <i>Secondary Method - ASTM D 6007-02</i> URBN will accept documentation/certification of compliance of the finished product or the composite wood components.

<i>Other home goods (frames, knobs, seasonal décor, etc.) (continued)</i>	CARB Formaldehyde Labeling <i>Applicable to products containing composite wood</i>	Label must include: 1. Manufacturer's name. 2. Product lot number or batch produced. 3. CARB assigned number for the third-party certifier. No third-party certifier number is required if the products were made using no-added formaldehyde (NAF) and certain ultra-low-emitting formaldehyde (ULEF) based resins. 4. A statement of compliance to denote that the composite wood product complies with the requirements of the ATCM.
	Proper Labeling	Country of Origin <i>UL Listed safety certification marking, applicable to electronic products</i>

### EXCEPTIONS

Per §1630.2 of Title 16 of the CFR, one-of-a-kind carpets or rugs may be exempt from the flammability standard. One-of-a-kind products must be handled on a case-by-case basis directly with the Regulatory Compliance department.

## FOOD PRODUCTS

### SUMMARY

Food products include all edible products such as candy, chocolate, sauces, drink mixes, etc.

### REQUIREMENTS

Requirement	Details (standard, test method, etc.)
Indirect Food Additive Restrictions	Food packaging should follow guidelines set forth in 21 CFR 175-177
Phthalates in Plastic Candy Wrapper	Sum of DBP, DEHP, BBP < 0.1% Sum of DINP, DIDP, DnOP < 0.1% GC-MS Method
Lead in Candy	FDA Recommended $\leq 0.1$ ppm California Regulation and Prop 65 Settlement $\leq 0.1$ ppm ICP-MS Method
Lead in Candy Wrapper	FDA Recommended Maximum Level, < 10 ppm Prop 65 Settlement $\leq 20$ ppm ICP-MS Method
Aflatoxin	All food $\leq 20$ ppb ELISA or HPLC
Food Packaging and Labeling Requirements	Packaging must include all information required by FP&L Act (21 CFR 101 & 102)
Chocolate Standard of Identity 21 CFR 163.111 (Chocolate), 163.123 (Sweet, Semi-Sweet Dark), 163.124 (White), 163.130 (milk)	Chocolate – Cocoa Fat 50-60% Sweet Chocolate - 15% Min Chocolate, 12% Max Total Milk Solids Semi-Sweet/Dark - 35% Min Chocolate, 12% Max Total Milk Solids White – 20% min Cocoa Fat, 3.5% Min Milk Fat, 14% min Total Milk solids, 35% Max Sweetener Milk – 10% min Chocolate, 3.39% Min Milkfat, 12% min total Mix Solids 21 CFR 163.5 - AOAC
Pathogens (Salmonella, Listeria Monocytogenes, E. coli O157:H7)	Not Detected FDA BAM
3-MCPD (In Asian Style Sauces)	$\leq 1$ ppm HPLC
Sulfites	$\leq 10$ ppm (Unless Allowed and Declared) AOAC 987.04, or comparable

Patulin	Drink Mixes, Drinks, Beverages or Juices containing Apple or Pear Juice ≤50 ppb HPLC or LC-MS/MS
Melamine and Cyanuric Acid	≤0.25 ppm if contains dairy ingredient from China FDA LIB 4422 (LC-MS/MS)
Pesticides	40 CFR 170, 180-186 – Less than or equal to tolerance or Not Detected (≤0.01 ppm) if no tolerance LC-MS/MS; GC-MS/MS
Ingredient List with Allergen Declaration Nutrition Information Storage Requirements	Ingredient list with allergens, nutrition information and storage requirements must be provided to URBN buyer. All Ingredients including colorants and sweeteners must be allowed used in the US.

## VENDOR EXPECTATIONS

Vendor must send ingredient list, nutrition information and storage requirements to URBN buyer/buying operations contact prior to shipping goods to URBN.

## EXCEPTIONS

- Food Products may be exempt from nutrition labeling, if manufactured by a small business, as defined by the FDA.
  - The nutrition labeling exemptions found in 21 CFR 101.9(j)(1) and 21 CFR 101.36(h)(1) apply to retailers with annual gross sales of not more than \$500,000, or with annual gross sales of foods or dietary supplements to consumers of not more than \$50,000. For these exemptions, a notice **does not** need to be filed with the Food and Drug Administration (FDA).
  - The nutrition labeling exemptions for low-volume products found in 21 CFR 101.9(j)(18) and 21 CFR 101.36(h)(2) apply if the person claiming the exemption employs fewer than an average of 100 full-time equivalent employees and fewer than 100,000 units of that product are sold in the United States in a 12-month period. For these exemptions, a notice **must** be filed annually with FDA.
  - If a person is not an importer, and has fewer than 10 full-time equivalent employees, that person does not have to file a notice for any food product with annual sales of fewer than 10,000 total units.
- Vendors who are exempt from nutrition labeling must submit a copy of the notice filed with the FDA to the buyer prior to shipping the goods. If the exemption does not require a notice to be filed, the vendor must submit a statement of exemption to the buyer prior to shipping.

## BEAUTY PRODUCTS

### SUMMARY

Cosmetics are defined by the FD&C Act as "articles intended to be rubbed, poured, sprinkled, or sprayed on, introduced into, or otherwise applied to the human body...for cleansing, beautifying, promoting attractiveness, or altering the appearance". This includes skin moisturizers, perfumes, lipsticks, nail polishes, eye and facial makeup, shampoos, hair products and deodorants, as well as any substance intended for use as a component of a cosmetic product.

### REQUIREMENTS

Requirement	Details (standard, test method, etc.)
Mercury Content in Cosmetics	Cosmetics should not contain levels of mercury that exceed the limits set forth in 21 CFR 700.13 < 1 ppm General Cosmetics < 65 ppm for cosmetics intended to be used on the eye area
Lead in Cosmetics	CA Prop 65 County of Alameda Court case No. H217587 [consolidated with 01-032306] ≤ 5 ppm lead content (Lipstick & Lip Liner) ≤ 10 ppm lead content (Eye Shadow & Blush)
Toxicological Risk Assessment	Must adhere to requirements in 16 CFR 1500.3(b)(5)-(9) and 21 CFR Parts 73, 74, 81, 82 & 700
Cosmetic Ingredient Review	Review formulation for Ingredients Prohibited for Use in Cosmetics 21 CFR 2.125, 250.250, 700.11, 700.13, 700.14, 700.15, 700.16, 700.18, 700.19, 700.23, 73, 74, 81 & 82
Cosmetic Label Review	<ul style="list-style-type: none"> <li>• Cosmetic labeling must include all information required by the FD&amp;C Act as well as the FP&amp;L Act; 21 CFR 701 and 16 CFR 500</li> <li>• Country of Origin labeling</li> </ul>
One Time Use Products - Fair Packaging And Labeling Act Or All Other Products - Uniform Packaging And Labeling Regulations (If Applicable)	Should be legibly marked with the following information: <ul style="list-style-type: none"> <li>• Manufacturer, packer, or distributor's name &amp; address (city, state &amp; zip)</li> <li>• Product identification</li> <li>• Net quantity of contents shall be expressed in terms of weight or mass, measure, numerical count, or combination so as to give accurate information to facilitate consumer comparison (U.S. and metric units).</li> </ul>
Prohibited Use of Vinyl Chloride Monomer in Self-Pressurized Products	16 CFR 1500.17 (a)(10)
Packaging: Lead, cadmium, mercury and chromium (VI)	Toxics in Packaging law (Toxics in Packaging Clearinghouse, TPCH) California, Connecticut, Florida, Georgia, Illinois, Iowa, Maine, Maryland, Minnesota, Missouri, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, Virginia, Washington, Wisconsin)
Microbial contamination	USP <61>+<62> or ISO 18416, ISO 22717, ISO 22718, ISO 21149, ISO 16212, ISO 21150

	<table border="1"> <thead> <tr> <th data-bbox="475 218 784 279">Microbial</th> <th data-bbox="784 218 1091 279">Limit values</th> </tr> </thead> <tbody> <tr> <td data-bbox="475 279 784 499">           Total Viable Count for aerobic mesophilic micro-organism #            - Total Bacterial Count            - Total Combined Molds &amp; Yeast Count         </td> <td data-bbox="784 279 1091 499"> <math>\leq 5 \times 10^3</math> cfu/g (for non-eye-area products)   <math>\leq 5 \times 10^2</math> cfu/g (for eye-area product)         </td> </tr> <tr> <td data-bbox="475 499 784 531">Staphylococcus aureus #</td> <td data-bbox="784 499 1091 531">Absent/ g</td> </tr> <tr> <td data-bbox="475 531 784 583">Pseudomonas aeruginosa #</td> <td data-bbox="784 531 1091 583">Absent/ g</td> </tr> <tr> <td data-bbox="475 583 784 615">Escherichia coli #</td> <td data-bbox="784 583 1091 615">Absent/ g</td> </tr> <tr> <td data-bbox="475 615 784 667">Bile tolerant Gram negative bacteria</td> <td data-bbox="784 615 1091 667">Absent/ g</td> </tr> <tr> <td data-bbox="475 667 784 699">Salmonella species</td> <td data-bbox="784 667 1091 699">Absent/ g</td> </tr> <tr> <td data-bbox="475 699 784 730">Clostridia species</td> <td data-bbox="784 699 1091 730">Absent/ g</td> </tr> <tr> <td data-bbox="475 730 784 762">Candida albicans</td> <td data-bbox="784 730 1091 762">Absent/ g</td> </tr> </tbody> </table>	Microbial	Limit values	Total Viable Count for aerobic mesophilic micro-organism # - Total Bacterial Count - Total Combined Molds & Yeast Count	$\leq 5 \times 10^3$ cfu/g (for non-eye-area products)  $\leq 5 \times 10^2$ cfu/g (for eye-area product)	Staphylococcus aureus #	Absent/ g	Pseudomonas aeruginosa #	Absent/ g	Escherichia coli #	Absent/ g	Bile tolerant Gram negative bacteria	Absent/ g	Salmonella species	Absent/ g	Clostridia species	Absent/ g	Candida albicans	Absent/ g	
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Salmonella species	Absent/ g																			
Clostridia species	Absent/ g																			
Candida albicans	Absent/ g																			
<p>OTC Consumer Antiseptic Wash Products (soaps, hand washes, body washes)</p>	<p>The following chemicals may not be present in OTC Consumer Product Antiseptic Washes:</p> <ul style="list-style-type: none"> <li>• Cloflucarban</li> <li>• Fluorosalan</li> <li>• Hexachlorophene</li> <li>• Hexylresorcinol</li> <li>• Iodophors (Iodine-containing ingredients)             <ul style="list-style-type: none"> <li>○ Iodine complex (ammonium ether sulfate and polyoxyethylene sorbitan monolaurate)</li> <li>○ Iodine complex (phosphate ester of alkylaryloxy polyethylene glycol)</li> <li>○ Nonylphenoxypoly (ethyleneoxy) ethanoliiodine</li> <li>○ Poloxamer—iodine complex</li> <li>○ Povidone-iodine 5 to 10 percent</li> <li>○ Undecoylium chloride iodine complex</li> </ul> </li> <li>• Methylbenzethonium chloride</li> <li>• Phenol (greater than 1.5 percent)</li> <li>• Phenol (less than 1.5 percent)</li> <li>• Secondary amylicresols</li> <li>• Sodium oxychlorosene</li> <li>• Tribromsalan</li> <li>• Triclocarban</li> <li>• Triclosan</li> <li>• Triple dye</li> </ul>																			
<p>Efficacy of antimicrobial preservation</p>	<p>USP&lt;51&gt; or ISO 11930:2012</p>																			
<p><b>For Fragrances, Perfumes, Body Sprays:</b> Total Volatile Organic Compound Content (VOC)</p>	<p>California Code of Regulations Title 17, Division 3. Chapter 1, Air Resources Board. Subchapter 8.5, Consumer Products. Article 2, Consumer Products – § 94509. Products with 20% or less fragrance: &lt; 75% Products with more than 20% fragrance: &lt; 65%</p>																			
<p><b>For Soaps, Shampoos and Conditioners:</b></p>	<p>CA Prop 65 Alameda County Superior Court Case No. RG 08-389960 County of San Francisco Court Case No CGG 10 500758</p>																			

1,4-Dioxane	≤ 10 ppm 1,4-Dioxane otherwise warning label required (Soap Products and Shampoo)
<b>For Soaps, Shampoos and Conditioners:</b> Cocamide DEA	CA Prop 65 County of Alameda Case No. RG 13-698427  Product containing cocamide DEA (cocamide diethanolamine / cocamide diethanolamine condensate) shall not be manufactured, distributed, sold or offered for sale provided that cocamide DEA is an intentionally added ingredient in the product and/or part of the product formulation.
Proper Labeling	<ul style="list-style-type: none"> <li>• Cosmetic labeling must include all information required by the FD&amp;C Act as well as the FP&amp;L Act; 21 CFR 701 and 16 CFR 500</li> <li>• Country of Origin</li> </ul>

## EXCEPTIONS

Beauty sample labels require less information than is required on the full-sized beauty products. Beauty samples must include labeling containing the following information:

- Name of the manufacturer or distributor
- Country of origin
- Comment 'Sample - Not for Resale'
- Net quantity
- *Warning statements, when applicable*
- *Active ingredients, when applicable*



## CHILDREN'S PRODUCTS

### SUMMARY

The law defines a "children's product" as a consumer product designed or intended primarily for children 12 years of age or younger. Children's products are required to undergo third party testing and to have a written Children's Product Certificate (CPC) demonstrating compliance. Vendors are encouraged to visit the CPSC website for clarity on children's product requirements.

**Note** - If a product is not necessarily marketed or sold as a children's product, but there is a reasonable chance a child would play with the product, the product should comply with children's product standards.

**IMPORTANT** – In addition to complying with the testing requirements below (as well as any other mandatory requirements that may not be listed below), all Children's Products **MUST** comply with the Restricted Substances guidelines found at the beginning of this document. If products are not in compliance with the identified chemical limits (the limits specific to Children's Products) the items cannot be shipped to URBN and may be refused at delivery.

### REQUIREMENTS

Product	Requirement	Details (standard, test method, etc.)
Apparel and Sleepwear	Flammability Testing	Apparel and sleepwear must comply with appropriate standard: 16 CFR 1610 / 16 CFR 1611/ 16 CFR 1615 / 16 CFR 1616  *Class 2 textiles – if multiple colorways of the same fabric, all colors must be tested.
	Drawstring Requirements <i>All children's clothing, size 0-16</i>	<ul style="list-style-type: none"> <li>• Drawstrings may not be used on hood or neck of children's garments.</li> <li>• Drawstrings used on waist/bottoms must follow requirements set forth in CPSC Guideline &amp; ASTM F1816</li> </ul>
	Mechanical Hazards (small parts for items for babies/children under 3 years old; sharp points/sharp edges for items for babies/children under 8 years old)	Baby and Children's products must adhere to all guidelines set forth in: 16 CFR 1501 16 CFR 1500.48 16 CFR 1500.49 16 CFR 1500.51-53
	Proper Labeling	<ul style="list-style-type: none"> <li>▪ Country of Origin</li> <li>▪ Care Instructions &amp; Care Symbols</li> <li>▪ Fiber Content</li> <li>▪ Importer Identification (RN # and CA #)</li> <li>▪ Product ID (ex: PO #, style #, etc.)</li> <li>▪ Size</li> </ul> <p><b>Tracking Label</b> - All children's products require a tracking label that complies with the CPSIA requirement.</p>
	Proper Sleepwear Labeling	Sleepwear must comply with all requirements set forth in 16 CFR 1615/1616 (sleepwear garment label, hang tag, sleepwear garment size, label on outer package)
Children's Bedding <i>(continued below)</i>	Flammability	Blankets: ASTM D4151 Other types of bed/bath textiles: ASTM D1230
	Proper Labeling	<ul style="list-style-type: none"> <li>▪ Fiber Content</li> <li>▪ Country of Origin</li> </ul>

Children's Bedding (continued)		<ul style="list-style-type: none"> <li>▪ Care Instructions</li> <li>▪ Importer Identification (RN # and CA #)</li> </ul> <p>Small Parts Labeling - If buttons or other small embellishments are attached to bedding intended for children age 3 and under, small parts labeling may apply.</p> <p><b>Tracking Label</b> - All children's products require a tracking label that complies with the CPSIA requirement.</p>
Children's Bedding Containing Filling	Flammability	Comforters, quilts - ASTM D1230 Mattress pads - 16 CFR 1632
	Proper Labeling	<ul style="list-style-type: none"> <li>▪ Fiber Content</li> <li>▪ Country of Origin</li> <li>▪ Care Instructions</li> <li>▪ Importer Identification (RN # and CA #)</li> </ul> <p>Small Parts Labeling - If buttons or other small embellishments are attached to bedding intended for children age 3 and under, small parts labeling may apply.</p> <p><b>Tracking Label</b> - All children's products require a tracking label that complies with the CPSIA requirement.</p>
	Law Label	Uniform Law Label <i>Registration required in certain states</i>
Children's Jewelry	Children's Jewelry Standard	Must comply with <b>all</b> standards in ASTM F 2923
	Proper Labeling	Country of Origin <b>Tracking Label</b> - All children's products require a tracking label that complies with the CPSIA requirement.
Toys (continued below)	<i>Overall - Toy Safety Standard</i>	<i>Toys must comply with all <b>applicable</b> standards in the most current ASTM F963 Standard. Supplier/Manufacturer is responsible for identifying which tests are applicable to its product.</i>
	Flammability	Must comply with applicable flammability standard ASTM F963 Annex A5 & A6 16 CFR 1610, 1500.44
	Lead Content in Surface Coating (Illinois)	Accessible components of toy for children aged under 12 years, child care article for children aged under 6 years, and children's jewelry of aged under 12 years, that contain Lead content greater than 0.004% (40 ppm) but less than 0.009% (90 ppm) by weight of the total content, shall have a warning statement that indicates that at least one component part of the item contains Lead.
	Tracking Label	All children's products require a tracking label that complies with the CPSIA requirement.
	Mechanical Hazards (cords, strings and elastics for items for babies under 18 months old; small parts, for items for babies/children under 3 years old; sharp points/sharp edges for items for babies/children under 8 years old, etc.)	Baby and Children's products must adhere to all guidelines set forth in: ASTM F963
Soluble Heavy Metal Content in Surface Coating and Substrates	ASTM F963 Section 4.3.5.1 and 4.3.5.2	

Toys (continued)	Soluble Cadmium Content for Metallic Small Parts	ASTM F963 Section 4.3.5.2
	Mercury Content in Batteries	Batteries larger than button cell shall contain no intentionally added Mercury.
	Formaldehyde Emissions from Composite Wood Products (when applicable)	ASTM E 1333-96(2002) (large chamber test method)  <i>Secondary Method - ASTM D 6007-02</i>  URBN will accept documentation/certification of compliance of the finished product or the composite wood components.
	Hazardous Liquid Chemicals	16 CFR 1500.231
	Age Grading	CPSC – Age Determination Guidelines
	Stuffing Cleanliness	ASTM F963 Section 4.27
	Stuffed Toy Registration and labeling	Sewn-in-Label requirements
	Hazardous Substances Labeling requirements (small parts, marbles, small balls, balloons, etc.; functional sharp points/edges)	16 CFR 1500.3 16 CFR 1500.19, 1500.121 16 CFR 1500.48, 1500.49 ASTM F963
	Art Materials (LHAMA)	16 CFR 1500.14 / ASTM D4236 Labeling of Hazardous Art Materials Act

### THIRD PARTY TESTING

The CPSC requires that all children's products are tested by a CPSC-approved third-party accredited laboratory. The CPSC website contains a list of the acceptable third-party labs, and vendors are required to use one of these testing labs to test their children's products. More information can be found here: <https://www.cpsc.gov/cgi-bin/labsearch/>

### VENDOR EXPECTATIONS

#### Ownbrand Vendors

- Vendor must upload applicable test report and/or certificate into Tradestone or send to buying/production team no later than 30 days prior to shipment of PO.
- Labeling must be accurate and complete, and durably attached to product.
  - ◆ *Correct labeling must be present on TOP.*
- If product fails required testing, vendor/manufacture must work with URBN on resolution & next steps.
  - ◆ *Do NOT ship products until resolution is determined.*

### **Market Vendors & Market Private Label Vendors**

- Vendor must maintain applicable test reports and certificates, and furnish upon request of URBN.
  - ◆ *Documents should be maintained for 5 years.*
- Labeling must be accurate and complete, and durably attached to product.
  - ◆ *Correct labeling must be present on TOP.*
- If product fails required testing, vendor/manufacturer must work with URBN on resolution & next steps.
  - ◆ *Do NOT ship products until resolution is determined.*

### **EXCEPTIONS**

There are no exceptions for children's products. If there is a unique product or situation causing the vendor or buyer to be unsure of the testing to be completed, or the proper steps to take, they must reach out to the Regulatory Compliance department for a solution.

# **LABELING REQUIREMENTS**

## LABELING REQUIREMENTS

All products must be labeled in accordance with current US Federal Trade Commission (FTC) and US Customs requirements, as well as Food & Drug Administration (FDA), Fair Packaging & Labeling Act (FPLA) and/or any other US law or regulation applicable to the product. URBN has additional labeling requirements for certain products, which must be followed as well. Below is an overview of labeling for major product categories. Please reference the vendor website or respective government website(s) for additional details on labeling.

### APPAREL, TEXTILE ACCESSORIES & HOME TEXTILES

The requirements listed below are a summary only. For the full labeling guide, please reference the URBN vendor website and/or the US Federal Trade Commission guidelines.

All Urban Outfitters products must contain the following information (*for specific accessory requirements, please refer to the accessory product marking chart below*):

- **Fiber Content** – Translate in 5 languages (English, French, German, Italian, and Spanish)
- **Care Symbols** – The symbols must appear in this order: washing, bleaching, drying, ironing, and professional care
- **Care Instructions** – Written in English and French
- **Importer Identification** – RN #, CA #, and EU address
- **Product Identification** – The style number or the PO number. The PO number or Master PO number is recommended for market vendors
- **Country of Origin** – “Made In” information written in English, French, and Spanish
  - **For apparel:** French and English will need to be on a separate woven main label placed at the neck or back of the garment. Spanish COO is not required to be placed at the back of the neck or waistband, and can be included on the care/content label placed in a side seam
- **Size** – All wearing apparel and accessories, as required, need to contain a size tag indicating the numeric (2, 4, 6, etc.) or alpha (Small, Med, Large) size of the item. *All sizing displayed on the product must coincide with the size indicated on the purchase order.*
  - *Petite styles must include “P” or “Petite” after the size.*

## Intimates

In addition to the normal apparel labeling requirements, for all products sold as Intimates, the following language must appear on the label:

**KEEP AWAY FROM FIRE**

Font must be red, size 10 point & all uppercase.

## Accessories

To comply with U.S., EU, and Canadian Marking Laws all accessories must have a durable marking <sup>(1)</sup>. This marking will be provided by the vendor, and should contain the required information described below.

Item	Country of Origin (In English, French and Spanish)	Care Instructions	Fiber Content <sup>(2)</sup>	Size	RN# and CA#
Bags/Totes – Fabric	Yes		Yes		
Bags/Totes – Leather	Yes		Yes		
Belts – Leather	Yes		Yes	Yes	
Belts – Fabric	Yes		Yes	Yes	
Eyewear <sup>(3)</sup>	Yes				
Footwear	Yes		Yes <sup>(4)</sup>	Yes	
Footwear – Cold Weather (wool)	Yes		Yes <sup>(4)</sup>	Yes	Yes
Gloves – Fabric	Yes		Yes	Yes	
Gloves – Leather	Yes		Yes	Yes	

<b>Hair Accessories – Metal or Plastic</b>	Yes				
<b>Hair Accessories – Fabric or Leather</b>	Yes		Yes		
<b>Handkerchiefs</b>	Yes		Yes		Yes
<b>Hats – Structured/Knit</b>	Yes		Yes		
<b>Jewelry</b>	Yes				
<b>Neckties</b>	Yes				
<b>Scarves</b>	Yes	Yes	Yes		Yes
<b>Socks/Legwarmers</b>	Yes	Yes	Yes	Yes	Yes
<b>Tights</b>	Yes	Yes	Yes	Yes	Yes
<b>Veils</b>	Yes		Yes		
<b>Wallets – fabric</b>	Yes		Yes		
<b>Wallets – leather</b>	Yes		Yes		

<sup>1)</sup> a) Apparel, home textile, and textile accessories label: Durable markings include but are not limited to, imprints and durably affixed hangtags. Markings should not be affixed to the polybags or to the URBN price tags and/or label.

b) Home products and accessories (non-textile) label: Durable markings include but are not limited to, imprints, self-adhesive labels, and durably affixed hangtags. Markings should not be affixed to the polybags or to the URBN price tags and/or label. Footwear markings must be affixed to the shoe and not placed on the shoebox

<sup>2)</sup> All accessories that require Fiber Content and will be shipping to the EU must include the Fiber Content in: English, French, Spanish, German, and Italian. Vendors are not required to indicate multiple instances of fiber content if the translation of the fiber content is the same in multiple languages.

<sup>3)</sup> Eyewear must also be marked identifying the Power Strength of the glasses (if applicable)

<sup>4)</sup> Fiber Content marking on footwear must include upper, sock lining, and outer sole



### **Wool Labeling**

Any product that contains wool (except rugs, carpets and upholsteries) must comply with the Wool Products Labeling Act. These products must contain labels that accurately reflect the items' fiber content, the country of origin, and either the name or registered identification number (RN or WPL number) issued by the FTC to the manufacturer or marketer. Labels on apparel items also must show a safe cleaning method.

### **Fur Labeling**

All fur and faux fur products must be labeled in compliance with applicable federal and state laws and regulations.

#### **Real Fur**

Fur products must be labeled to comply with FTC regulations as well as any US State regulations. Per FTC requirements, fur products must have a label disclosing:

- **the animal name**
- **the name or RN of the manufacturer, importer or other seller, marketer, or distributor.**
- **the country of origin for imported fur**
- **if the fur is pointed, dyed, bleached or artificially colored.**
  - If none of these treatments applies, the fur should be labeled "natural."
- **if the fur product is composed in whole or substantial part**
- **if the fur is used or damaged.**
- **the textile or wool content of any part of the product.**

For further detail on fur labeling requirements, please visit the FTC's website – <https://www.ftc.gov/node/119458>

#### **Faux Fur**

Faux fur products must be labeled with the words "Faux Fur", in addition to any other applicable labeling requirements.

### **Leather and Imitation Leather Labeling**

Leather and Imitation Leather products must be labeled in accordance with the FTC Guide for Select Leather and Imitation Leather Products, 16 CFR 24.

If all or part of an industry product is made of non-leather material that appears to be leather, the fact that the material is not leather, or the general nature of the material as something other than leather, should be disclosed. For example: Not leather; Imitation leather; Simulated leather; Vinyl; Vinyl coated fabric; or Plastic.

## **Fiber Content – Trade Names**

A fiber trademark name may be used on a content label **as long as it appears next to the generic fiber name.**

*Example: 100% Lycra® Spandex*

If using a trade name, the vendor must have legal documentation that the product is manufactured by the company with the registered trademark.

## **Bamboo**

Per the Federal Trade Commission, textile products may only be labeled as “bamboo” if they are made directly from actual bamboo fiber - often called “mechanically processed bamboo”. Textiles made from rayon (or viscose) that was created using bamboo as a plant source must be labeled and advertised as “rayon (or viscose) made from bamboo” - or more simply, rayon or viscose.

## **NON-APPAREL PRODUCTS**

### **All Products**

To comply with the U.S. and Canadian Marking Laws all products must be durably marked with Country of Origin, in English and French.

- Must be visible to consumer at point of purchase
- Must include the full name of the country; Abbreviations and variant spelling are acceptable if the spellings clearly indicate the English name of the country of origin

*\*Plants (including: live, artificial or dried, flowers, shrubs, and nursery stock) do not require a country of origin marking.*

### **Candles**

In addition to adhering to the standard labeling requirements for hard goods, candles must also include the following “warnings” on the product.

1. Always burn a candle within sight
2. Keep candles away from things that can catch fire
3. Keep candles out of the reach of children.

## **FOOD & DIETARY SUPPLEMENT LABELING**

While food and dietary supplement labeling requirements are very similar, they are treated as two separate categories by the FDA and the requirements are slightly different for each category. Vendors should ensure they have properly identified their product as a food or a supplement, and comply with the applicable requirements, as described below.

### **Food Products**

Food products must be labeled in compliance with FDA regulations, and must include the additional URBN requirements. The FDA has specific guidelines (related to placement of information on the label, type size, etc.) that can be found on the [www.FDA.gov](http://www.FDA.gov) website.

Labels should include the following information:

- Statement of identity (name of the food)\*
- Net quantity of contents statement\*
- Name and address of the manufacturer, packer or distributor
  - Unless the name given is the actual manufacturer, it must be accompanied by a qualifying phrase which states the firm's relation to the product (e.g., "manufactured for" or "distributed by")
- Nutrition Facts panel
- Ingredient List
  - Must list each ingredient in descending order of predominance.
- Allergen Labeling (if applicable)
  - Per the Food Allergen Labeling Consumer Protection Act (FALCPA), the label of a food that contains an ingredient that is or contains protein from a "major food allergen" (**listed below**) must declare the presence of the allergen in the manner described by the law.
    1. milk
    2. egg
    3. fish
    4. Crustacean shellfish
    5. tree nuts
    6. wheat
    7. peanuts
    8. soybeans
- Sell by Date (*URBN requirement*)
- Lot/Batch # (*URBN requirement*)
- Country of Origin (*URBN requirement*)

*\*This information must appear on the PDP (Principal Display Panel - portion of the package label that is most likely to be seen by the consumer at the time of purchase)*

## **Dietary Supplements**

Dietary Supplements must be labeled in compliance with FDA regulations, and must include the additional URBN requirements. The FDA has specific guidelines (related to placement of information on the label, type size, etc.) that can be found on the [www.FDA.gov](http://www.FDA.gov) website.

Labels should include the following information:

- Statement of identity (name of the dietary supplement)\*
- Net quantity of contents statement\*
- Supplement Facts panel
  - Must list the names and quantities of dietary ingredients present in your product, the "Serving Size" and the "Servings Per Container." However, the listing of "Servings Per Container" is not required when it is the same information as in the net quantity of contents statement. For example, when the net quantity of contents statement is 100 tablets and the "Serving Size" is one tablet, the "Serving Per Container" also would be 100 tablets and would not need to be listed.
  - Nutrient Declaration - total calories, calories from fat, total fat, saturated fat, cholesterol, sodium, total carbohydrate, dietary fiber, sugars, protein, vitamin A, vitamin C, calcium, and iron must be listed when they are present in measurable amounts.
- Ingredient list
  - If you place all source ingredients in the "Supplement Facts" panel and you have no other ingredients, such as excipients or fillers, you do not need an ingredient statement.
  - Use the words "Other Ingredients" when you have identified some ingredients (i.e., as sources) within the nutrition label.
- Name and address of the manufacturer, packer, or distributor
  - Unless the name given is the actual manufacturer, it must be accompanied by a qualifying phrase which states the firm's relation to the product (e.g., "manufactured for" or "distributed by")
- Sell by Date (*URBN requirement*)
- Lot/Batch # (*URBN requirement*)
- Country of Origin (*URBN requirement*)

## **Beauty Products**

All beauty products shipped to URBN must comply with the labeling requirements of the Federal Food, Drug, and Cosmetic (FD&C) Act, the Fair Packaging and Labeling (FP&L) Act, and the regulations published by the Food and Drug Administration under the Authority of these two laws.

Some information on the label (detailed below) must be printed in both English and French, to be compliant in the Canadian market as well.

The following information must appear on the **principal display panel (the part of a label that the consumer sees or examines when displayed for retail sale)**:

- Identity Statement -in both English and French
- Net Quantity of Contents – in both English and French (metric and imperial units)

The following information must appear on an **information panel**:

- Name and address of manufacturer, packer or distributor
- Country of Origin
- Ingredient Declaration
- Directions, warnings or cautions in English and French
- Batch Number

## **Beauty Product Samples**

All individual beauty product samples must be marked with the following information:

- Distributor's name
- Net quantity
- "Sample – Not for Resale"
- Country of Origin
- any warning statements (if applicable)
- any active ingredients

## PRODUCT CLAIMS

US Federal law limits the types of claims that may be made for conventional foods, dietary supplements, and cosmetics. All product claims made on product packaging or web product description must comply with applicable FTC and FDA regulations, as well as any other applicable regulations pertaining to the product category. Vendors will be expected to furnish documentation which substantiates claims made related to its product upon request. (*Example – ‘BPA Free’ claim on packaging of a water bottle must be supported by test reports proving the product is free of BPA*)

There are many different types of claims, and the requirements vary by product category. Vendors are expected to comply with all requirements that apply to their product, and can learn more about the requirements by visiting the Federal Trade Commission (FTC) and/or Food & Drug Administration (FDA) websites.