

**State of California  
Department of Consumer Affairs**



**LABELING**

Requirements for Law and Flammability Labels

**FREQUENTLY ASKED QUESTIONS  
(FAQs)**

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## **TABLE OF CONTENTS**

<b><u>TOPIC</u></b>	<b><u>PAGE NO.</u></b>
<b>Upholstered Furniture and Bedding Labels.....</b>	<b>1</b>
<b>Re-Upholstered Furniture Label.....</b>	<b>4</b>
<b>Care Label.....</b>	<b>4</b>
<b>Mattress Labels .....</b>	<b>4</b>
<b>Rebuilt Mattress Labels .....</b>	<b>5</b>
<b>Rental Mattress Label .....</b>	<b>5</b>

## Upholstered Furniture and Bedding Labels

1. **Q: What type of label is required on upholstered furniture and bedding products if sold in the state of California?**

A: (1) California law requires that law and flammability labels (which include the FR Chemical Statement) be attached to every article of new upholstered furniture offered for sale in the state.

(2) California law requires that all new bedding products with concealed filling material (comforters, bed pillows, decorative pillows, etc.) have law labels and some products require care labels to be attached.

2. **Q: What color and type of material should the law and/or flammability labels be made of?**

A: The law and flammability labels must be white with black print. The labels must be printed on a material which is not easily torn or defaced. Paper is not an acceptable material

3. **Q: How should the label(s) be attached to my product?**

A: Labels must be securely attached to the product in such a manner that they are openly and easily visible at the point of sale. Labels are not to be concealed or obstructed from view in any manner. Labels must not detach from the product during shipping or handling. Hangtag label attachments are not permitted. Labels zippered into the slip cover of decorator pillows or other products are not permitted.

You may attach labels to the decking in upholstered furniture with detachable cushions or you may attach to the bottom of the product.

4. **Q: How does the Bureau define “permanently affixed?”**

A: Permanently affixed means the label will not inadvertently detach from the product during shipping or moving and that it stays in place until the end customer receives the product for use.

5. **Q: Can the retailer or manufacturer remove the labels?**

A: Only the end consumer may remove the law and flammability labels.

6. **Q: What font size should the wording be on the law label and what information is required to be capitalized?**

A: Letter height must be a minimum of 1/8”. The “UNDER PENALTY OF LAW...”, “All NEW MATERIALS” and the actual inside filling components must all be in capital letters. The words “consisting of” and the “certification” statement need not be in caps or 1/8” height but must be legible. The word Registry No. must be 1/8” in height when measured from the capital “R” and the registry number itself must be 1/8” in height. The font style is not specified in our regulations.

**7. Q: What font size should the wording be on the flammability labels?**

A: Letter height must be a minimum of 1/8", in capital letters. The font style is not specified in our regulations.

**8. Q: Whose registry number should be printed on the law label?**

A: The end manufacturer (last stitch rule) of the product must print their assigned registry number on the law label. Only one registry number is permitted on the law label.

**9. Q: What size must the law and flammability label be?**

A: The law label must be a minimum size of 2" X 3"; it may be larger but not smaller. The flammability label must be a minimum size of 2" X 3"; it may be larger but not smaller. The addition of the flame retardant chemical statement that follows the TB117-2013 compliant statement will require the flammability label to be larger to meet the print size and verbiage requirements.

**10. Q: Can I print information on the back of the law and flammability labels?**

A: No information may appear on the back of the law or flammability labels with the following exception:

As of August 2005, the Chief allowed retailers and/or importers/wholesalers to place a bar code or UPC Code (in stamp or sticker format) on the bottom (following the "other" information section) of the law label or on the back of the law label.

**11. Q: Can I print the bar code, SKU code or UPC codes on the bottom of the law label?**

A: The bar codes, SKU code or UPC codes can be combined with the law label, provided that both are separated by a bold black line and the law label meets the size requirements before the bold black line

**12. Q: Can I print the permit number (used for sterilization of plumage products) in the "registry number" area of the law label?**

A: Some states require the permit number for feather and down products. California does not require sterilization permit number to be printed on the law label; however we will allow the permit number on the law label following the registry number. The registry number must appear before the permit number and both numbers must be clearly identified.

**13. Q: Can I print "Contents Sterilized" on the law label attached to feather and down products?**

A: We will allow "Contents Sterilized" to be printed in the "ALL NEW MATERIALS " section located below the inside filling components of the law label.

**14. Q: What is the RN number?**

A: The RN number is a separate and distinct number assigned by the Federal Trade Commission (FTC). The RN number is only allowed at the bottom of the law label in the "other" information section. RN number information may be found on the FTC website, [www.ftc.gov](http://www.ftc.gov).

**15. Q: Can I print labels in other languages?**

A: The English language labels are a requirement. If the manufacturer would like to provide labels in other languages, they may do so on a separate label.

**16. Q: What label format should I use for decorative pillows?**

A: A Type No. 1 law label format is used for decorative pillows.

**17. Q: What label format should I use for furniture products with detachable cushions?**

A: A Type No. 2 law label format is used when upholstered furniture contains detachable cushions.

**18. Q: How must I describe the inside filling material on the law label?**

A: The inside filling material must be described on the law label in order of predominance, the largest component first. The percentages are based on the weight of each specific filling material present. See example below:

A (oz.) = the total weight of all polyurethane foam pad layers in the sample

B (oz.) = the total weight of polyester fiber batting in the sample

C (oz.) = the total weight of all blended cotton batting layers in the sample

D (oz.) = the total weight of all the component materials

Percentage weight of polyurethane foam pad:  $\frac{A \times 100}{D}$

Percentage weight of polyester fiber batting:  $\frac{B \times 100}{D}$

Percentage weight of blended cotton batting:  $\frac{C \times 100}{D}$

The terminology used for the inside filling materials must be generic, not brand names or trademarks. The generic terms must include specific physical configurations, i.e. polyurethane foam pad, shredded polyurethane foam, polyester fiber batting, etc.

**19. Q: What products require a finished size to be printed on the law label?**

A: The finished size is required for bedding products such as sleeping bags, futons, mattresses, comforters, mattress pads, pads, box springs, bed pillows and similar bedding articles. The finished size shall be stated in inches. You may include meter notation if desired. Note: Decorator pillows do not need the finished size printed on the law label.

**20. Q: What products require a net weight of filling materials to be printed on the law label?**

A: The net weight of filling materials is required for bedding products such as sleeping bags, mattresses, box springs, pads and similar bedding products. The net weight of filling materials shall be stated in pounds and ounces.

**21. Q: Where shall I print the finished size and net weight of filling materials on the law label?**

A: The finished size and/or net weight of filling materials may be printed below the inside filling components in the “ALL NEW MATERIAL” section of the law label or you may print this information in the “optional information” section at the bottom of the law label.

**22. Q: May I combine the law label and flammability label?**

A: The law label and flammability label may be placed on the same label material, side to side or top to bottom as long as:

- Each label is a minimum size of 2” X 3”
- Labels are separated by a solid black line
- Printing is allowed on one side of the label only, and
- The law label precedes the flammability label, i.e. law label appears to the left or at the top of the combined label

### **Re-upholstered Furniture Label**

**23. Q: What labels must be attached to re-upholstered furniture?**

A: A green law label, with black print should be used on renovated upholstered products with partially new and partially old material.

### **Care Label**

**24. Q: What products require a care label?**

A: Typically a care label should be attached to bedding products such as sleeping bags, mattress pads, comforters, bedspreads, coverlets, quilts, and similar bedding products that are designed to be cleaned by the consumer. This label has no size requirement from the Bureau and may be placed beside the law label as long as they are separated by a bold black line.

### **Mattress Labels**

**25. Q: What labels must be used on mattresses?**

A: A white law label, Type No. 7, which includes a finished size and net weight of filling materials and the Federal flammability label required by the 16 CFR 1633 standard.

**26. Q: What information must be included on the Federal flammability label attached to a mattress?**

A: Each mattress set must bear a permanent label stating (1) the name of the manufacturer, or for imported mattress sets, the name of the foreign manufacturer and the importer; (2) the complete physical address of the manufacturer, and if the mattress is imported, the complete physical address of the importer of U.S. location where records are maintained; (3) the month and year of manufacture; (4) the model identification; (5) prototype identification number; and (6) a certification that the mattress complies with the standard 16 CFR 1633.

## **Rebuilt Mattress Labels**

**27. Q: What labels must be attached to a rebuilt mattress?**

A: A red law label, Type No. 9, a yellow sanitization label and the Federal flammability label required by the 16 CFR 1633 standard must be attached to all rebuilt mattresses.

**28. Q: What size label and print size should be used on the red secondhand law label?**

A: The label must be a minimum of 2" X 3". Letter height must be 1/8". The "UNDER PENALTY OF LAW...", "THIS PRODUCT CONTAINS SECONDHAND (USED) FILLING MATERIALS" and the newly added inside filling components must all be in capital letters. The words "consisting of" and the "certification" statement need not be in caps or 1/8" height but must be legible. The words Registry No. must be 1/8" in height when measured from the capital "R" and the registry number itself must be 1/8" in height.

**29. Q: What size label and print size should be used on the yellow sanitization label?**

A: The minimum size of the yellow sanitization label shall be 3" x 3". The words "Secondhand Article" and "Sanitized" shall be a minimum of 3/8" in height, in capital letters.

**30. Q: What color and type of material should the sanitization label be made of?**

A: The sanitization label must be yellow with black print and shall be made from erasure-proof paper and shall not change color during application of adhesive.

## **Rental Mattress Label**

**31. Q: What type of label must be attached to rental mattresses once they are properly sanitized?**

A: A yellow sanitization label (with black print) should be used on all sanitized rental mattresses.