FILLED PRODUCT REGISTRATION & LABELING REQUIREMENTS

Registration and labeling requirements were established for filled products in the United States and Canada in 1952. These requirements help States/ Provinces monitor the manufacturing of certain products, as well as protect customers from unsafe or unsanitary filling materials.

Filled products include, but are not limited to:

- **Bedding**: bed pillows, comforters, decorative pillows, mattress pads, quilts, or any bedding item that contains stuffing concealed by fabric or any other flexible material.
- **Stuffed Toys**: any item intended for use by children or infants as a plaything which is filled with or contains any fiber, chemical or other stuffing.
- **Apparel**: quilted clothing, gloves, hats, coats, and slippers.

All filled products, including apparel, must meet the additional labeling requirements developed by the International Association of Bedding and Furniture Law Officials (IABFLO) and the American Down and Feather Council (ADFC). These requirements include, but are not limited to factory registration, sterilization permits, and/or law labels.

Currently **13** States and **3** Canadian Provinces require registration, in addition to a law label.

Each of these States/ Provinces has their own set of registration requirements, including the types of products that need to be registered, the length of license period, the renewal process, registration fee, and violation fees. Therefore, each registration needs to be applied for and monitored individually.

All filled products that are sold to MMG must be in Compliance with all applicable requirements.

SUPPLIER RESPONSIBILITIES:

Suppliers of filled products are responsible for researching and understanding all tagging laws and must ensure that their factories are registered in all relevant States/ Provinces. It is the responsibility of all Suppliers to be fully aware of all updates and changes in these requirements and to maintain compliance.

Suppliers are responsible for all costs associated with registering, obtaining and renewing licenses in required states/provinces.

Suppliers are responsible for avoiding lapses in registration; therefore renewal needs to be requested prior to expiration date.

SUPPLIER RESPONSIBILITIES (continued):
Suppliers are responsible for maintaining registrations for a minimum of 18 months past the last ship date, as registrations must remain valid while the product is in store.

Suppliers are responsible for ensuring that law labels are correct and properly attached to the product.

Suppliers are responsible for sending all copies of valid certificates to Product Integrity Manager for Customer Feedback.

If there are any questions regarding these requirements, please contact the Product Integrity Manager of Customer Feedback to ensure proper labeling prior to shipment.

ENFORCEMENT:

State/ Province:
To ensure compliance, Enforcement Agents routinely visit stores to inspect law labels at the retail level.

If an Agent discovers non-compliant product, the product is immediately removed from the sales floor and the manufacturer and importer are notified of the violation.

The manufacturer can also be fined as much as $1500 per violation.

The product will remain off-sale until the violation is rectified.

Multiple violations from the same manufacturer can result in a ban from selling product in that State/ Province.

MMG:
To ensure compliance, the MMG NY PI Dept. also reserves the right to conduct random in-store audits.

If non-compliant product is found during these audits, the MMG NY PI Dept. will contact the Supplier for resolution.

STATE REGISTRATION OVERVIEW:

State	Product	Duration	Expiration Information	Use # from a different state?	Cost
California	Bedding	2 years	Expires 2 years after registration date	YES	$650
Connecticut	Bedding	1 year	Expires April 30 of each year	YES	$100
Delaware	Bedding	1 year	Expires December 31 of each year	YES	$50
Massachusetts	Bedding & Toys	1 year	Expires June 30 of each year	NO	$300
North Carolina	Bedding	1 year	Expires February 28 of each year	YES	$50 - $720
Ohio	Bedding & Toys	1 year	Expires 1 year after registration date	YES	$50
Oklahoma	Bedding	1 year	Expires June 30 of each year	YES	$5
Pennsylvania	Bedding & Toys	1 year	Expires 1 year after registration date	YES	$50
Rhode Island	Bedding	1-3 years	Expires June 30th of each year	YES	$210-$630
Texas	Bedding	2 years	Expires 2 years after registration date	YES	min $220
Utah	Bedding & Apparel	1 Year	Expires December 31st of each year. $25 late fee if not renewed by January 1st.	YES	$105
Virginia	Bedding	1 year	Expires 1 year after registration date	YES	$100
West Virginia	Bedding	1 year	Expires June 30 of each year	YES	$50

PROVINCE REGISTRATION OVERVIEW:

State	Product	Duration	Expiration Information	Use # from a different state?	Cost
Quebec	Bedding & Apparel	1 year	Expires 1 year after registration date	NO	$309
Ontario	Bedding, Apparel & Toys	1 year	Expires 1 year after registration date	NO	$400
Manitoba	Bedding, Apparel & Toys	1 year	Expires 1 year after registration date	NO	$400

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FREQUENTLY ASKED QUESTIONS:

Which U.S. States/ Canadian Provinces require registration?

Bedding	Stuffed Toys	Apparel
California	Massachusetts	Utah
Connecticut	Ohio	Manitoba
Delaware	Pennsylvania*	Ontario
Massachusetts **	Manitoba	Quebec
North Carolina	Ontario	
Ohio		
Oklahoma		
Pennsylvania		
Rhode Island		
Texas		
Utah		
Virginia		
West Virginia		
Manitoba		
Ontario		

**Massachusetts will issue it's own URN.

* Pennsylvania requires a Pennsylvania license number to be on the label and does not accept the use any other State's licensing number. Ohio and Massachusetts will accept the use of a Pennsylvania toy registration number if that Pennsylvania number is registered within these states and their fees are paid. Register with the state of Pennsylvania first and us the Pennsylvania number to register in Ohio and Massachusetts.

What is a URN (Uniform Registration Number)?

- It is the number that is issued to a manufacturer after registration, for example OH 12345 (CN). This number will need to be printed on the law label.
- EACH FACTORY LOCATION MUST BE REGISTERED AND HAVE THEIR OWN URN.
- A uniform registry number system exists between States so that manufacturers only need to print one URN on their labels. Therefore, this number will be assigned by the first State that a manufacturer is registered with. That number should then be used on the applications for all other States.
- Importers/ Distributors do not receive a URN, however, some states require them to co-register with the manufacturer.
- Importers/ Distributors must ensure that the manufacturer is actively registered in all required States prior to the products being sold.
- State/ Province Enforcement Agents will look up URNs during their in-store inspections to verify that registrations up to date.

What is a Sterilization Permit Number?

- Bedding and furniture products that contain down, feather, or wool filling are required to also include a Sterilization Permit Number from the State of Pennsylvania (PA) on the law label in addition to the URN.
- Only the factory that processes the down, feather, wool fill can apply and the process will include a thorough inspection of the processing plant.
- The PA Sterilization Permit Number must also be registered in Connecticut (CT) and Massachusetts (MA).

FREQUENTLY ASKED QUESTIONS (continued):

What is a Law Label?

- It is a legally required label that must be attached to filled products.
- These labels are used to inform the customer of the type of hidden filling material and inform them if the material is new or used.
- The labels must be printed on durable, non-tearable material and must be visible to the customer at point of sale.
- A required uniform label format was developed enabling all States to accept a single label.
- Canada has separate law tag requirements that must be complied with for those orders.

What if my registration lapses?

- Maintenance and management is critical. If a number lapses, repercussions can include going through the entire registration process again, fines, and/ or a ban from selling product.

How soon can I renew a certificate that is about to expire?

- You should begin registration as early as 60 days before the expiration date. Do not wait for the expiration date to renew, as it takes 4-8 weeks for the renewal process.

Do labels need to be a certain size? Are there other requirements for the label?

- Bedding: Law labels need to be a minimum of two by three inches and there are requirements as to specific text and type size as well. Some states require advance review of a given label.
- Stuffed Toys: There is no color, size or type requirement for the UNIFORM LABEL provided the print is legible and can be readily discerned. The label must be affixed to the stuffed toy itself.
- Apparel: Quilted and filled clothing does not require a law label in the US, however, Canada requires law labels. Manufacturers of quilted and filled clothing for the US must license their products prior to offering their clothing for sale in Utah.

How should a label be attached?

- Bedding: Law labels are required to be permanently attached to the product. Perforated labels are not permitted.
- Stuffed Toys: No special method of affixing labels is required, however the information must be affixed to the stuffed toy itself and must be "clearly visible" at point of sale. Therefore, if the label is beneath doll's clothing and the item is being sold in a box, the required information must also appear on the box.
- Apparel: For Canadian Provinces, labels must be attached in a place where they may be easily seen and sewn to one of the seams of the article.

May a law label be combined with another label?

- A law label may not be combined with another label.

What if the same product is produced in more than one factory or facility?

- Each manufacturing facility requires its own URN number. While the product may seem “identical,” the law label on product manufactured at one site would bear a different registration number than the product produced at another site. This enables a state inspector to trace back the origin of a given product in case of a problem or a possible need to recall a product.

FREQUENTLY ASKED QUESTIONS (continued):

If the factory no longer ships filled products for MMG, do I still need to keep the registration up to date?

- The registration needs to be kept valid for 18 months after the last shipment.

Are there penalties for failing to register and/or not having a law label on the product?

- In cases of non-compliance, product can be pulled from retail shelves, the manufacturer can be fined up to $1,500 per violation and/or a manufacturer can be banned from selling product in that State/Province.