## Is the surface coating in scope of 16 CFR 1303 or SOR/2016-193?

| **Surface Coating**<br>often determined by the "Scraping Test." If a material can be scraped off and separated from the underlying material, the CPSC generally treats it as a surface coating | **CPSC 16 CFR 1303** | **SOR 2016 -193 / SOR 2022-122** |
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| **Paints:** This includes oil-based and water-based paints(latex based), primers, and topcoats. | Yes | Yes |
| **Varnishes:** Transparent coatings used for protection and decoration | Yes | Yes |
| **Lacquers:** High-gloss finishes often used on wood or metal furniture. | Yes | Yes |
| **Electroplating:** Metal finishes applied through an electrolytic process.(chrome Plating) | No | No |
| **Enamels:** Hard, glossy coatings often used on appliances or metal toys. | No | Yes |
| **Glazes:** Often found on ceramics or pottery (if they are intended for children or furniture). | No | Yes |
| **Stains:** Liquid coatings used to color wood while allowing the grain to show. | Yes | Yes |
| **Shellacs:** Natural resins dissolved in alcohol, used as a wood sealer. | Yes | Yes |
| **Drying Oils:** Such as linseed or tung oil, when used as a finish. | Yes | Yes |
| **Substrates:** The material *under* the paint (e.g., the actual plastic, wood, or metal the toy is made of). | No | No |
| **Mass-pigmented materials:** Plastics or rubbers where the color is mixed throughout the entire material rather than applied as a thin layer on the surface. | No | No |
| **Paper/Cardboard:** Generally treated as a substrate unless it has a distinct plastic or chemical coating applied. | No | No |
| **Screen Printing Inks:** If the ink has "body" and sits on top of the surface (common on decorative panels), it is often treated as a coating.If the ink is absorbed into the wood grain or the paper/plastic laminate layer of the furniture, it is **exempt** from the 90 ppm lead-in-paint limit (though it still must meet general lead-in-substrate limits if the item is for children) | Yes | Yes |

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| **Stickers and Decals:** Under 16 CFR 1303, stickers are generally treated as **substrates** rather than surface coatings. (Note: In Canada, they *are* included as coatings, but the US CPSC differentiates them). | No | Yes |
| **Powder Coating (Factory-Applied Coatings on Metal):** Metal furniture (like a metal desk or filing cabinet) that has a **factory-applied coating** (like **powder coating**) is technically **exempt** from the lead-in-paint ban, provided it is not intended for use by children. | No | No |
| **Mirror Backing:** The silvering/backing paint on mirrors used in furniture (like a dresser mirror) is exempt from the lead limit, even if it contains lead. | No | Yes (only children's products) |
| **Fabric Dyes:** Dyes that soak *into* the fibers (like on a sofa) are usually considered part of the substrate. | No | No |
| **Liquid Adhesives:** Glues used *between* layers (like for a laminate) are not "surface coatings" because they aren't the final exposed layer. | No | No |
| **Screen Printing**: **(Serigraphy):** Because screen printing lays down a relatively thick layer of ink on top of a surface (like a decorative logo on a wooden chair back), it is almost always treated as a **surface coating** subject to the 90 ppm limit. | Yes | Yes |
| **UV-Cured Inks:** These inks sit on the surface and "plasticize" when cured. Because they form a distinct layer, they are generally categorized as coatings. | Yes | Yes |
| **Electrostatic Liquid Spray (Paints/Lacquers):** This process uses a liquid paint that is "charged" so it wraps around the furniture piece for even coverage. | Yes | Yes |
| **Upholstery:** The CPSC generally views fabric, foam, and leather as **substrates**, not coatings. However, modern upholstery often involves chemical treatments that may fall under the regulations.**refer to:** Top-Grained/Pigmented Leathers, non fabric components, Screen Printing | No | No |
| **Top-Grained/Pigmented Leathers:** Many "finished" leathers have a heavy opaque paint layer applied to the surface to hide imperfections. If this layer can be scraped off as a film, it is a coating. | Yes | Yes |
| **Performance Treatments (DWR/Stain Resistance):** Chemical finishes like Scotchgard, Teflon, or antimicrobial treatments are generally **not** coatings. They are considered "impregnated" or "applied finishes" that don't form a distinct, scrapable film. | No | No |

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| **Upholstery non fabric components**: (Decorative Wood Trim, Metal Sofa Legs (except powder coatings),Plastic "Faux Wood" Legs) | Yes - decorative wood trim | Yes |
| **Painted or Lacquered MDF** (Medium-Density Fiberboard) and similar manufactured woods (like particleboard and plywood) | Yes | Yes |
| **Melamine and Laminates MDF** (Medium-Density Fiberboard) and similar manufactured woods (like particleboard and plywood): Melamine/HPL, Vinyl Wraps (Thermofoil), Paper Foils | No | No |
| **Laminates and Veneers:** High-pressure laminates (HPL), melamine, and wood veneers are considered **substrates**, not coatings. While they are on the "surface," they are separate layers of material bonded with adhesive, not a dried liquid film. | No | No |
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