

US and Canadian Consumer Labeling Requirements for  
**VP Racing Power Sports 2T Motorcycle  
Oil**

**ZXP Technologies**

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# Summary

VP Racing Power Sports 2T Motorcycle Oil is regulated under the US Federal Trade Commission Fair Packaging and will need to be labeled with the required information as detailed below in the Product Review section. The product is not regulated under the US Consumer Product Safety Commission requirements.

VP Racing Power Sports 2T Motorcycle Oil is regulated under Canada's Consumer Packaging and Labelling Regulation and will need to be labeled with the required information as detailed below in the Product Review section. The product is not regulated under the Canadian Consumer Chemicals and Containers Regulation (CCCR SOR/2001-269).

## Scope of work

ZXP Racing Technologies asked UL to provide information on US Federal Trade Commission and US Consumer Product Safety Commission requirements for the consumer product VP Racing Power Sports 2T Motorcycle Oil based on the information provided for SDS authoring purposes.

ZXP Racing Technologies asked UL to provide information on Canada's Consumer Packaging and Labelling Regulation and Canadian Consumer Chemicals and Containers Regulation (CCCR SOR/2001-269) for the consumer product VP Racing Power Sports 2T Motorcycle Oil based on the information provided for SDS authoring purposes.

## Product review

### Product Review – United States

VP Racing Power Sports 2T Motorcycle Oil is regulated under the US Federal Trade Commission Fair Packaging and Labeling Act and will require:

the "Statement of Identity" commonly known as the product name;  
Name and place of business of the manufacturer, packer or distributor and  
Net quantity of contents

Name and place of business should be the US entity responsible for entering the product into US commerce.

Net contents must be shown on the principal display panel in the prescribed font size as covered under the Fair Packaging and Labeling Act (15 US Code 1453(a)). Net contents must be in English and metric units. Size requirements are detailed in the Background – US Federal Trade Commission section below.

VP Racing Power Sports 2T Motorcycle Oil is not classified as hazardous under the US Consumer Product Safety Commission (CPSC) Federal Hazardous Substance Act (FHSA) and so will not require any specified hazards information.

Country of origin is necessary for crossing international borders.

US regulations require only English on packaging. Many companies choose to add additional languages, Spanish being the most common, depending on target markets, etc. Where more than one language is on the product, all hazard information voluntarily added is recommended to be in those languages.

The OSHA classification on the SDS is based on the US OSHA Hazard Communication Standard 29CFR1910.1200 (commonly referred to as HazCom 2015). This is not harmonized with the US Consumer Product Safety Commission regulation.

The OSHA classification in Section 2 of the US OSHA HazCom 2015 SDS includes Carcinogenicity and Reproductive Toxicity. US CPSC regulates Carcinogens and Reproductive Toxins under Chronic toxicity but also allows for the level of potential consumer exposure to be taken into consideration under 16 CFR 1500.135(d). Based on the anticipated level of consumer exposure, chronic effects would not be considered a significant risk. If this evaluation is not consistent with “normal consumer use”, please request additional warnings for use on the consumer label.

## Product Review – Canada

VP Racing Power Sports 2T Motorcycle Oil is regulated under the Consumer Packaging and Labelling Regulation (C.R.C., c. 417) under the Consumer Packaging and Labelling Act. The label will require the product name, net quantity and Canadian business information.

The law requires the information to be in both Canada’s official languages of English and French with the exception that the Canadian business information only needs to be in one of the two languages.

Net quantity shall be shown in both metric and Canadian units in bold face type in letters of not less than the following height:

**(2)** The numerical quantity in the declaration of net quantity shall be shown in bold face type in letters of not less than the following height:

- **(a)** 1/16 inch (1.6 millimetres), where the principal display surface of the container is not more than five square inches (32 square centimetres);
- **(b)** 1/8 inch (3.2 millimetres), where the principal display surface of the container is more than five square inches (32 square centimetres) but not more than 40 square inches (258 square centimetres);
- **(c)** 1/4 inch (6.4 millimetres), where the principal display surface of the container is more than 40 square inches (258 square centimetres) but not more than 100 square inches (645 square centimetres);
- **(d)** 3/8 inch (9.5 millimetres), where the principal display surface of the container is more than 100 square inches (645 square centimetres) but not more than 400 square inches (25.8 square decimetres); and
- **(e)** 1/2 inch (12.7 millimetres), where the principal display surface of the container is more than 400 square inches (25.8 square decimetres)

VP Racing Power Sports 2T Motorcycle Oil is not classified as hazardous under the Consumer Chemicals and Containers Regulation (CCCR SOR/2001-269) so there is no specified requirements for hazard warnings.

## Background – US Consumer Regulations

### **US Federal Trade Commission:**

In the US, the Federal Trade Commission is responsible for handling products placed on the market. Requirements for labelling may be found at 16 CFR 500 and the label must have a Statement of identify (commonly referred to as the product name); Name and place of business of manufacturer, packer or distributor in the US and the Net Quantity of contents.

The Net Quantity needs to appear on the bottom 30% of the label panel and be separated by a space at least as tall as lettering used for the declaration.

Size is dictated by the size of the principle display panel:

With area of principal display panel defined as above, the type size in relationship to area of that panel shall comply with the following specifications:

- (1) Not less than 1/16 inch (1.5 mm) in height on packages the principal display panel of which has an area of 5 square inches or (32.2 cm<sup>2</sup>) less.
- (2) Not less than 1/8 inch (3.1 mm) in height on packages the principal display panel of which has an area of more than 5 (32.2 cm<sup>2</sup>) but not more than 25 square inches (161 cm<sup>2</sup>).
- (3) Not less than 3/16 inch (4.7 mm) in height on packages the principal display panel of which has an area of more than 25 (161 cm<sup>2</sup>) but not more than 100 square inches (6.45 dm<sup>2</sup>).
- (4) Not less than 1/4 inch (6.35 mm) in height on packages the principal display panel of which has an area of more than 100 square inches (6.45 dm<sup>2</sup>), except not less than 1/2 (12.7 mm) inch in height if the area is more than 400 square inches (25.8 dm<sup>2</sup>).

### **US Consumer Product Safety Commission:**

In the US, 16 CFR governs consumer labeling. The definition of a “Hazardous substance” may be found at 16 CFR 1500.3(a)(4)(i). If a product meets the definition for hazardous and it is subject to the regulations. In addition to the signal word, “an affirmative statement” of the hazards is required, as are precautionary measures and instructions for first aid treatment. The statement “Keep out of the reach of children” is necessary unless the product is designed for children.

16 CFR 1500.121 contains the guidelines to make sure information required appears prominently and conspicuously and is the basis for our recommendations.

Placement is detailed in the regulation as follows:

(ii) The signal word, the statement of principal hazard(s), and, if appropriate, instructions to read carefully any cautionary material that may be placed elsewhere on the label shall be blocked together within a square or rectangular area, with or without a border, on the principal display panel on the immediate container and, where required by paragraph (b)(4) of this section, on any outer container or wrapping. All cautionary statements placed on the principal display panel shall be separated on all sides from other printed or graphic matter, with the exception of the declaration of net contents required under the Fair Packaging and Labeling Act, 15 U.S.C. 1453(a) (2) and (3), by a border line or by a space no smaller than the minimum allowable height of the type size for cautionary material required by the Act (exclusive of signal words and statements of hazard) on the principal display panel.

The product is in what is considered the “immediate container” and that is subject to labeling. The regulations require all “immediate containers” and outer packaging that is what the consumer may see and read on the shelf prior to purchase carry all relevant health and safety information. This may require the necessary information to be placed on outer packaging in addition to the immediate container. Any “accompanying literature where there are directions for use” needs to also include the label warnings.

All font sizes have to conform to the following requirements based on the area of the principle display panel

Area of principal display panel in square inches	0-2	>2-5	>5-10	>10-15	>15-30	>30
Type size in inches*						
Signal word**	$\frac{3}{64}$	$\frac{1}{16}$	$\frac{3}{32}$	$\frac{7}{64}$	$\frac{1}{8}$	$\frac{5}{32}$
Statement of hazard	$\frac{3}{64}$	$\frac{3}{64}$	$\frac{1}{16}$	$\frac{3}{32}$	$\frac{3}{32}$	$\frac{7}{64}$
Other cautionary material***	$\frac{1}{32}$	$\frac{3}{64}$	$\frac{1}{16}$	$\frac{1}{16}$	$\frac{5}{64}$	$\frac{3}{32}$

(ii) In the case of a cylindrical or nearly cylindrical container or tube on which the principal display panel appears on the side, the area of the principal display panel shall be 40 percent of the product of the height of the container times its circumference.

Country of origin, company name and address are all necessary components on the packaging. The address should include street or post office box as applicable.

US regulations require only English on packaging. Many companies choose to add additional languages, Spanish being the most common, depending on target markets, etc. Where more than one language is on the product, all necessary hazard communication text must be in those languages.

## Background – Canadian Consumer Regulations

Canada’s Consumer Packaging and Labelling Regulation (C.R.C., c. 417) under the Consumer Packaging and Labelling Act governs the handling of consumer goods in Canada. It details the type of information must be shown, where on the label it needs to be placed and the size that the information must be presented in as found at [Consumer Packaging and Labelling Regulations \(justice.gc.ca\)](http://www.justice.gc.ca/consumer-packaging-and-labelling-regulations) .

Please note the official languages for Canada are English and French and all required information must be provided in both with the exception of the identity and principal place of business.

Net quantity shall be shown in both metric and Canadian units in bold face type in letters of not less than the following height:

**(2)** The numerical quantity in the declaration of net quantity shall be shown in bold face type in letters of not less than the following height:

- **(a)** 1/16 inch (1.6 millimetres), where the principal display surface of the container is not more than five square inches (32 square centimetres);
- **(b)** 1/8 inch (3.2 millimetres), where the principal display surface of the container is more than five square inches (32 square centimetres) but not more than 40 square inches (258 square centimetres);
- **(c)** 1/4 inch (6.4 millimetres), where the principal display surface of the container is more than 40 square inches (258 square centimetres) but not more than 100 square inches (645 square centimetres);
- **(d)** 3/8 inch (9.5 millimetres), where the principal display surface of the container is more than 100 square inches (645 square centimetres) but not more than 400 square inches (25.8 square decimetres); and
- **(e)** 1/2 inch (12.7 millimetres), where the principal display surface of the container is more than 400 square inches (25.8 square decimetres)

Consumer chemicals are governed by the Consumer Chemicals and Containers Regulation (CCCR SOR/2001-269) under the Canada Consumer Product Safety Act. CCCR contains definitions, classification criteria and resultant labelling requirements and may be found at <https://laws-lois.justice.gc.ca/eng/regulations/SOR-2001-269/page-1.html>

**chemical product** means a product used by a consumer that has the properties of one or more of the following:

- **(a)** a toxic product; **(b)** a corrosive product; **(c)** a flammable product; or
- **(d)** a quick skin-bonding adhesive.

**20** The following information must be printed

- **(a)** in upper-case letters
  - **(i)** the signal word,
  - **(ii)** the primary hazard statement, and
  - **(iii)** the specific hazard statement; and
- **(b)** in bold-faced, upper-case letters, the titles "**FIRST AID TREATMENT**" and "**PREMIERS SOINS**".

**25 (1)** The information required by these Regulations must be displayed on the container at the following locations and in the following order:

- **(a)** on the main display panel,
  - **(i)** a hazard symbol,
  - **(ii)** the signal word "EXTREME DANGER", "DANGER" or "CAUTION", as the case may be, and

- (iii) the primary hazard statement; and
- (b) on any part of the display surface,
  - (i) the specific hazard statement,
  - (ii) negative instructions,
  - (iii) positive instructions, and
  - (iv) the first aid statement.

### First aid statement — order of information

31 The first aid statement must set out the following information in the following order:

- (a) the title “FIRST AID TREATMENT” and “PREMIERS SOINS”;
- (b) the words “Contains” and “Contient”;
- (c) a list of the hazardous ingredients in the chemical product and
- (d) the required statements of first aid treatment.

### Other information — height and body size

24 (1) Subject to subsection (3), when the main display panel has an area set out in column 1 of the table to this subsection, the following information must be in type that is at least the height set out in column 2 and at least the body size set out in column 3:

- (a) the primary hazard statement;
- (b) the specific hazard statement;
- (c) the negative and positive instructions; and
- (d) the titles “FIRST AID TREATMENT” and “PREMIERS SOINS”.

### TABLE TO SUBSECTION 24(1)

#### Minimum Height and Body Size of Type

	Column 1	Column 2	Column 3
Item	Area of the main display panel	Minimum height of type	Minimum body size of type
1	less than 100 cm <sup>2</sup>	2 mm	6 point
2	100 cm <sup>2</sup> or more but less than 330 cm <sup>2</sup>	3 mm	8 point
3	330 cm <sup>2</sup> or more	4 mm	12 point

### First aid statement — height and body size

(2) Subject to subsection (3), the first aid statement, except for the titles “FIRST AID TREATMENT” and “PREMIERS SOINS”, must be in type that has a minimum height of 2 mm and a minimum body size of 6 points.



# References

1. US Federal Trade Commission - [www.ftc.gov](http://www.ftc.gov)
2. US Consumer Product Safety Commission - [www.cpsc.gov](http://www.cpsc.gov)
3. US CPSC Regulated Products Handbook - <https://www.cpsc.gov/Global/Business-and-Manufacturing/Business-Education/RegulatedProductsHandbook.pdf>
4. US CPSC Business Desktop Reference Guide - <https://www.cpsc.gov/PageFiles/132073/QuickResourceGuideFinalJune2015.pdf>
5. Canada Consumer Packaging and Labelling Regulations [Consumer Packaging and Labelling Regulations \(justice.gc.ca\)](http://www.justice.gc.ca/eng/regulations/sor-2001-269/index.html)
6. Canada CCCR <https://laws-lois.justice.gc.ca/eng/regulations/sor-2001-269/index.html>



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