

Information Collection Request (ICR)
Safety Standard for Cigarette Lighters
Supporting Statement
(OMB Control No. 3041-0116)

A. Justification

1. Need for the Information Collection

The Safety Standard for Cigarette Lighters (16 CFR part 1210) addresses the risks of death and burn injury associated with fires accidentally started by children playing with cigarette lighters. The standard requires certain test protocols, as well as recordkeeping and reporting requirements. 16 CFR part 1210, subpart B.

In addition, section 14(a) of the Consumer Product Safety Act (CPSA) requires manufacturers, importers, and private labelers of a consumer product subject to a consumer product safety standard to issue a certificate stating that the product complies with all applicable consumer product safety standards. 15 U.S.C. 2063(a). Section 14(a) of the CPSA also requires that the certificate of compliance must be based on a test of each product or upon a reasonable testing program. Some of these activities may constitute a collection of information, as defined by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (PRA). 44 U.S.C. 3501-3520.

2. *Use and sharing of collected information*

The reasonable testing program embodied in the standard requires manufacturers to create “surrogate lighters,” which do not make a flame but provide a signal to indicate when a flame would have been made in a real lighter containing fuel. The surrogate lighters are required to be identical in every way that can affect child resistance to production lighters intended for consumers. Child panels to establish that the lighters meet the standard’s child-resistance criterion (85 percent) test these surrogate lighters. Specifications for the lighters must be established so that production lighters may be tested regularly to ensure that they do not differ from the surrogate lighters in any way that would adversely affect child resistance.

Records must be kept of the initial testing of the surrogates (qualification testing), of the lighter specifications, and of the ongoing production testing. The surrogate lighters that were tested, and the qualification test records, must be kept in the U.S. and be available for inspection by the Commission’s staff within 48 hours of request. Production test records may be maintained outside the U.S. provided they can be made available for inspection in the U.S. within 1 week of request. Inspections of the surrogate lighters, specifications, and test records by the Commission’s staff help to determine if production lighters are sufficiently similar to the tested surrogate lighters and that adequate controls have been placed on the manufacturing process.

The manufacturer or importer is required to submit certain information about its product, and to submit a prototype or production unit of the lighter model at least one month before the initial importation or distribution in commerce. Commission staff uses this information to determine that the lighter complies with the standard.

3. *Use of information technology (IT) in information collection*

Consideration has been given to the use of improved information technology. The records that will be permanent for as long as the model is produced, and for 3 years thereafter, may be kept electronically as long as they can be directly examined. Production records, also, may be kept electronically. Information can be submitted electronically to RegulatoryEnforcement@cpsc.gov.

4. *Efforts to identify duplication*

These records are generated by a firm in the normal conduct of its business. There are no other sources of this information, or duplication.

5. *Impact on small businesses*

The Standard covers manufacturers and importers of disposable and novelty lighters intended for sale to consumers. Small manufacturers and importers are subject to all of the labeling, reporting, and certification provisions of the Standard. Accordingly, CPSC provides a variety of resources to help both new and experienced small businesses learn about safety requirements that apply to consumer products, including the CPSC Regulatory Robot and small business education videos. CPSC provides lighter business guidance at <https://www.cpsc.gov/Business--Manufacturing/Business-Education/Business-Guidance/Lighters>, as well as a link to the Small Business Ombudsman (SBO) contact form, <https://www.cpsc.gov/About-CPSC/Contact-Information/Contact-Specific-Offices-and-Public-Information/Small-Business-Ombudsman>.

6. *Consequences to Federal program or policy activities if collection is not conducted or is conducted less frequently*

The collection of information and reporting requirements apply only to specific occasions relating to each individual lighter model. Therefore, collecting information less frequently would either omit certain models or supply insufficient information concerning particular models.

7. *Special circumstances requiring respondents to report information more often than quarterly or to prepare responses in fewer than 30 days.*

Except as necessary to comply with 15 U.S.C. § 2063, the reporting is not required more often than quarterly. Records are kept for 3 years after the events to which they relate. Thus, qualification test records and surrogate lighter specifications need to be kept until 3 years after the production of the model has ceased.

8. *Agency's Federal Register Notice and related information*

A notice soliciting comments on the Commission's intent to request an extension of a previously approved collection of data was published in the Federal Register (FR) on September 22, 2025, 90 FR 45377. The Commission received two, out of scope, public comments.

9. *Decision to provide payment or gift*

No payments or gifts are made to any respondents.

10. *Assurance of confidentiality*

Any information required to be submitted that the manufacturer or importer claims to be confidential is subject to procedures for withholding confidential information from public disclosure set forth at 16 C.F.R. Part 1015, subpart B. See 16 C.F.R. § 1210.17(c).

11. *Questions of a sensitive nature*

Not applicable.

12. *Estimate of hour burden to respondents*

Firms subject to Commission rules may incur costs associated with various kinds of activities, depending on the requirements of each rule. Firms may conduct tests, maintain and retrieve records, provide written reports or certificates, prepare correspondence in response to Commission inquiries, or perform other tasks in order to establish and/or demonstrate compliance. Varying proportions of professional and clerical time may be spent in the performance of these tasks. Costs attributable specifically to activities related only to Commission rules are difficult to identify, since many of the relevant activities, such as testing and recordkeeping, occur during firms' normal course of business. However, an average cost range can be applied to the estimated numbers of hours needed to complete the necessary tasks. This yields a very rough approximation of the dollar costs to industry (excluding such factors as destructive product testing and potential product-line diversion).

Based on averaging available data from fiscal years 2021 (used in the last PRA renewal) and 2024, CPSC estimates approximately 30 firms will respond to the collection annually. CPSC expects four new models to be subject to initial qualification testing annually and approximately 139 lighters comparable to previously tested models, comparison lighters, to be subject to ongoing testing annually.

a. PRA Testing Burden

The PRA testing burden is the time and cost associated with the testing requirement of the rule, which includes reviewing instructions, compiling materials necessary for the collection, maintaining necessary technology and systems, and

training personnel. PRA testing burden can be completed either by the firm or by outside contractors. If the firm elects to use an outside contractor, no PRA testing hours are incurred, however we estimate the cost per model to be about \$25,000 on average.¹ If all 4 new lighter models are tested annually by outside contractors, the PRA testing cost would be about \$100,000.

If tests are conducted in-house, the burden of testing a new model is expected to be about 90 hours per model. The total testing time for the 4 models, if conducted in-house, would be 360 hours. We estimate that hourly compensation for the time required for testing is \$77.19 per hour (U.S. Bureau of Labor Statistics, "Employer Costs for Employee total compensation for management, professional, and related workers in goods-producing industries: https://www.bls.gov/news.release/archives/ecec_06132025.pdf). This results in a total in-house new lighter testing cost of \$27,788.40 (\$77.19 per hour × 360 hours). The total testing cost to industry for this regulation would then be in the range of \$27,788 to \$100,000 per year, depending on whether the testing is performed in-house or outsourced.

There are no testing costs associated with the comparison lighters. Under §1210.14, if a manufacturer has tested one lighter model, and then wishes to distribute another lighter model that differs from the first model only in features that would not have an adverse effect on child resistance, the second model need not be tested in accordance with §1210.4.

b. Recordkeeping Burden

The cost of the recordkeeping requirement has two separate components: recordkeeping for new models and recordkeeping for comparable models. The time consumed in recordkeeping for new models has been estimated at 20 hours per model. Thus, the total time consumed for recordkeeping of new models would be 80 hours (20 hours × 4 models). We estimate the hourly compensation for the time required for record keeping is \$41.59 (U.S. Bureau of Labor Statistics, "Employer Costs for Employee Compensation," March 2025, Table 4, total compensation for all sales and office workers in goods-producing, private industries: https://www.bls.gov/news.release/archives/ecec_06132025.pdf). The estimated annual cost of recordkeeping for new models rounded to the nearest dollar is \$3,327.20 (80 hours × \$41.59).

The regulation allows firms to submit comparison lighter records. These are records associated to lighters that feature similar child resistance characteristics, and can be used by CPSC in substitution of records from original testing. Using FY21 and FY24 data we estimate 139 comparison lighters will be submitted to the CPSC. While firms would bear no testing costs for comparison lighters, the time consumed in recordkeeping has been estimated at 3 hours per model. Thus, we estimate burden of 417 hours (139 models × 3 hours). We estimate the hourly compensation for the time required for record keeping is \$41.59 (U.S. Bureau of Labor Statistics, "Employer Costs for Employee Compensation," March 2025, Table 4, total compensation for all sales and

¹ This estimate is based on an estimated cost of \$22,000 per test panel, but for a few models a second test panel will be required.

office workers in goods-producing, private industries:

https://www.bls.gov/news.release/archives/ecec_06132025.pdf). The estimated annual cost of recordkeeping for comparison lighters rounded to the nearest dollar is \$17,343 (417 hours × \$41.59).

In total, the estimated total recordkeeping burden for new lighter models and comparison lighters is 497 hours (80 hours + 417 hours). The estimated total recordkeeping costs for new lighter models and comparison lighters is \$20,670 (\$3,327 + \$17,343).

c. Reporting Burden

CPSC staff estimates that approximately one hour per product will be required for manufacturers to submit information to CPSC, or 143 total hours for reporting (4 new lighter models + 139 comparisons). We estimate the hourly compensation for the time required for submitting the information is \$41.59 (U.S. Bureau of Labor Statistics, “Employer Costs for Employee Compensation,” March 2025, Table 4, total compensation for all sales and office workers in goods-producing, private industries: https://www.bls.gov/news.release/archives/ecec_06132025.pdf). Therefore, rounded to the nearest whole dollar, the estimated cost of reporting is \$5,947.

d. Total Burden

The annual total number of hours could be as high as 1,000 hours (360 testing hours + 497 record keeping hours + 143 reporting hours) per year. If some firms elect to outsource testing of new models, the burden could be reduced.

CPSC staff estimates that the total PRA burden cost for firms to test lighters, and prepare, maintain, and submit testing records to the CPSC in order to comply with the lighter regulation is in the range of \$54,406 to \$126,618, depending upon whether the firms choose to conduct testing in-house or through outsourcing.

13. Estimates of other total annual cost burden to respondents or recordkeepers

There are no costs to respondents beyond those presented in Section A.12. CPSC staff does not expect any significant additional operating, maintenance, or capital costs associated with the collection.

14. Estimate of annualized costs to the federal government

The estimated cost of this collection to the federal government is \$170,004. This represents one FTE annually. The annual cost of the rule to the federal government is comprised chiefly of the Commission’s resources for compliance activities. This estimated cost to the federal government is based on an annual salary of \$114,923 (the equivalent of a GS-12 Step 5 employee, based on January 2025 salary rates for the Washington, DC area). Salary comprises about 67.6 percent of total compensation and benefits account for about 32.4 percent (U.S. Bureau of Labor Statistics, Employer Costs

for Employee Compensation (ECEC) for civilian management, professional, and related workers, March 2025 (https://www.bls.gov/news.release/archives/ecec_06132025.pdf). Therefore, total estimated annual compensation per FTE is \$170,004 (\$114,923 in salary + \$55,081 in benefits).

15. *Program changes or adjustments*

There are no changes to this information collection. Estimates are adjusted using the latest compensation data and the latest FY compliance data.

16. *Plans for tabulation and publication*

Not applicable.

17. *Rationale for not displaying the expiration date for OMB approval*

Not applicable.

18. *Exception to the certification statement*

Not applicable

B. *Collection of Information Employing Statistical Methods*

Not applicable.