

E-ssentials

Choose certainty.
Add value.

Consumer Products | Technical updates essential to your operations

Softlines

An overview of the EU and US requirements of drawstrings and cords on children's clothing

Drawstrings and cords on children's clothing have raised safety concerns in both the European Union (EU) and the United States (US). In 2011, the [EU Rapid Alert System for Non-Food Products \(RAPEX\)](#) has reported nearly 300 cases related to drawstrings and cords on children's garments¹. In the US, the Consumer Product Safety Commission (CPSC) has also recalled several products related to safety concerns posed by drawstrings in 2011.

The entrapment of hood drawstrings and cords in playground equipment can lead to strangulation for young children, while non-compliant drawstrings on the waist and lower hems of garments can be caught in moving vehicles, dragging older children and young persons along with them. Incidents of severe injuries and death have been reported.

The EU's General Product Safety Directive (GPSD) provides guidelines on the safety requirements regarding drawstrings and cords on children's garments with the standard EN 14682:2007, which was harmonised in March 2011². In July 2011, the CPSC approved a [new safety rule](#)³ to include children's upper outerwear into the [Substantial Product Hazard List](#)⁴. A manufacturer who fails to report a substantial product hazard to the Commission is subject to civil penalties.

THE EU REPORTED CASES OF DRAWSTRINGS AND CORDS ON CHILDREN'S CLOTHING

Various kinds of clothing such as swimming suits, shorts and jackets have been reported in RAPEX and many of the non-compliant products were ordered by the authorities to be withdrawn from the market. Manufacturers, therefore, need to pay attention to the applicable requirements before placing children's garments on the EU market. The following are some suggestions that can help minimise the chances of non-compliance:

- Avoid having drawstrings, functional or decorative cords in the hood or neck areas for the garments intended for young children



- The drawstrings and cords at the waist and low hem of the pants should not hang below the lower edge of the garments
- Halter neck-style garments for young children such as bikini should have no free ends in the hood and neck areas
- Avoid having knots or three-dimensional embellishments at the free ends of drawstrings and cords

THE US SUBSTANTIAL PRODUCT HAZARD LIST INCLUDES DRAWSTRINGS ON CHILDREN'S UPPER OUTERWEAR

Compared with the EU, the US requirement on drawstrings is only applicable to children's upper outerwear. On 18 August 2011, the final rule issued by the CPSC on children's upper outerwear garments which have neck or hood drawstrings (in sizes 2T to 12), and those which have waist or bottom drawstrings (in sizes 2T to 16) present a substantial product hazard came into effect.

According to the rule, children's upper outerwear need to comply with ASTM F1816-97 as stated in the Substantial Product Hazard List (16 CFR Part 1120). Garments that fail to comply with the standard are considered to be Substantial Product Hazards. The CPSC can order the manufacturer, distributor, or retailer of the product to offer replacement, repair or refund to the customers. Non-compliant products cannot be imported into the US.

Table A (next page) provides a comparison between the EU and US standards for drawstrings and cords on children's clothing.

[Continued on next page >>](#)

¹ Visit the EU Rapid Alert System for Non-Food Products (RAPEX) at http://ec.europa.eu/consumers/dyna/rapex/rapex_archives_en.cfm

² See Retail Essentials Vol. 26 for details at https://www.tuv-sud.in/APMKT/pdf/retail/E-essentials_v26_06-2011.pdf

³ See the CPSC's press release on the drawstring safety rule for children's outerwear at <http://www.cpsc.gov/CPSCPUB/PREREL/prhtml11/11268.html>

⁴ See the final rule published in the Federal Register at <http://www.gpo.gov/fdsys/pkg/FR-2011-07-19/pdf/2011-17961.pdf>

>> Continued from previous page

Table A: Comparison between the EU and US standards for drawstrings and cords on children's clothing

	EU	US
Standard	EN 14682:2007	ASTM 1816-97
Age grade	<ul style="list-style-type: none"> Young children are defined as 0 to 6 year and 11 month Older children and young persons are defined as 7 to 14 year old 	Estimated age ranged from 18 month to 14 year old
Scope	Drawstrings and cords on children's clothing including disguise costumes and skiwear	Drawstrings on children's upper outerwear such as jackets and sweatshirts for the below size ranges: <ul style="list-style-type: none"> Sizes 2T to 12 with neck and hood drawstrings Sizes 2T to 16 with certain waist or bottom drawstrings
Exemption	Drawstrings and cords on the below articles: <ul style="list-style-type: none"> Child use and care articles Shoes, boots and similar footwear Gloves, hats, bonnets and scarves Neckties designed to be worn with a shirt or blouse Belts and braces Religious clothing that may be worn all the time, and celebratory clothing Specialist sportswear and activity wear generally worn for limited periods and under supervision, for example rugby shorts, wet suits, and dancewear, except where those garments are commonly worn as day wear or night wear Theatrical costumes used for theatrical performances Aprons intended to be worn over day wear, for limited periods and under supervision, to protect clothing from soiling during activities such as painting, cooking, or during meal times. 	Upper outerwear with fully retractable drawstrings and drawstrings on pants, shorts, skirts

Softlines, Hardlines, Electricals & Electronics, Toys & Children's Products, and Food, Health & Beauty

Third recommendation submitted by the ECHA for REACH Annex XIV (Authorisation List)

On 21 December 2011, the European Chemicals Agency (ECHA) submitted to the European Commission its [third recommendation](#) for 13 Substances of Very High Concern (SVHC) to be included in the Annex XIV (the "Authorisation List") of the REACH regulation¹.

The recommendation contains all 13 substances proposed in the middle of last year in June 2010², all of which have carcinogenic, mutagenic and/or reprotoxic (CMR) properties. No use or PPORD (product and process orientated research and development) categories are recommended for exemption³.

It is now up to the European Commission to decide which substances will be officially included in [Annex XIV](#)⁴. Once included, businesses in the EU will have between 18 to 24 months to submit [authorisation applications](#) for specific use(s) of these SVHCs. The "sunset dates" are 18 months after the respective application deadlines, and after that

date, substances listed on Annex XIV can only be used within the EU if an authorisation has already been granted.

Authorisation does not apply to imported articles. ■



¹ Read the official ECHA Press Release at http://echa.europa.eu/web/guest/view-article/-/journal_content/84f13bf9-d6fd-41ee-aeeb-cdf7e9cdee

² Refer to E-ssentials Vol. 28 (June 2010) at https://www.tuv-sud.in/APMKT/pdf/Retail_E-ssentials_v28_06-2011.pdf

³ See details and related documents on this third recommendation at <http://echa.europa.eu/web/guest/addressing-chemicals-of-concern/authorisation/recommendation-for-inclusion-in-the-authorisation-list/previous-recommendations/3rd-recommendation>

⁴ View the current Authorisation List at <http://echa.europa.eu/web/guest/addressing-chemicals-of-concern/authorisation/recommendation-for-inclusion-in-the-authorisation-list/authorisation-list>

Softlines

CPSC publishes Position Letter on children's sleepwear



On 20 December 2011, the CPSC issued a [letter](#)¹ to manufacturers, distributors, retailers and importers, reminding them the compliance of children's sleepwear in the US. This letter emphasizes the definition of "children's sleepwear" to include any product of wearing apparel (in sizes 0 – 14), such as nightgowns, pajamas, or similar or related items,

¹ Download the Position Letter in full from <https://www.cpsc.gov/businfo/sleepwearpolicy.pdf>

such as robes, intended to be worn primarily for sleeping or activities related to sleeping.

The CPSC staff regards "loungewear" (or other similar garments marketed as comfort wear) as children's sleepwear because it is worn primarily for sleep-related activities. Therefore, such garments also need to comply with the flammability requirements in 16 CFR Part 1615 or 16 CFR Part 1616 under the Flammable Fabrics Act.

In addition, the CPSC also considers the following factors when determining whether a piece of garment is considered as sleepwear:

- The nature of the garment and its suitability for sleeping or activities related to sleeping
- The type of fabric, decorative features, and print pattern
- How the garment is promoted and distributed
- The likelihood that the garment will be purchased for and used by children primarily for sleeping or activities related to sleeping.

Besides the flammability requirement, the letter also reminds businesses to comply with the other mandatory requirements for children's products, including sleepwear, as stated by the CPSIA. These requirements include: tracking labels, lead content in substrates and surface coatings, and phthalates (sleepwear is considered to be a childcare article). Any company who fails to meet these requirements is subject to penalties. ■

Your regional Consumer Products contacts worldwide

Asia Pacific

TÜV SÜD Asia Pacific
3 Science Park Drive
#04-01, The Franklin
Singapore 118223
+65 6427 4751
info@tuv-sud.sg

Americas

TÜV SÜD America
10 Centennial Drive
Peabody, MA 01960
USA
+1 800 888 0123
info@tuvam.com

Western Europe

TÜV SÜD Product Service GmbH
Ridlerstr. 65
80339 Munich
Germany
+49 180 332 42 42
productservice@tuev-sued.de

Central & Eastern Europe

TÜV SÜD Central Eastern Europe s.r.o.
Novodvorská 994/138
142 21 Praha 4
Czech Republic
+420 239 046 800
info@tuv-sud.cz

DISCLAIMER

All reasonable measures have been taken to ensure the quality, reliability, and accuracy of the information in this newsletter. However, TÜV SÜD is not responsible for the third party content contained in this newsletter. TÜV SÜD makes no warranties or representations, expressed or implied, as to the accuracy or completeness of information contained in this newsletter.

This newsletter is intended to provide general information on a particular subject or subjects and is not an exhaustive treatment of such subject (s). Accordingly, the information in this newsletter is not intended to constitute consulting or professional advice or services. If you are seeking advice on any matters relating to information in this newsletter, you should – where appropriate – contact us directly with your specific query or seek advice from qualified professional people.

The information contained in this newsletter may not be copied, quoted or referred to in any other publication or materials without the prior written consent of TÜV SÜD. All rights reserved © 2012 TÜV SÜD Asia Pacific Pte Ltd.