

CHILDREN'S CLOTHING: REQUIREMENTS FOR THE UNITED STATES

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COMMISSION

U.S. Consumer Product Safety Commission

Target for Extinction: Drawstrings



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CHILDREN'S UPPER OUTERWEAR TO
BE SOLD IN THE UNITED STATES
MUST MEET U.S. REQUIREMENTS...

Target for Extinction: Drawstrings



- NO drawstrings EVER in the hood and neck area for sizes 2T to 12;
- NO drawstrings at the waist and bottom that exceed 75mm when garment is expanded to full width for sizes 2T to 16; and
- NO toggles, knots, or other attachments at free ends of waist or bottom drawstrings.

Target for Extinction: Drawstrings



- Drawstrings at the waist must be sewn or bartacked when a single cord runs through the channel.
- **Must meet standard ASTM F 1816**

Children's Clothing Sizes



Know correct dimensions for garment sizes defined in standard ASTM F 1816.

This standard does not cover ages, unlike requirements in other countries.

Approximate ages corresponding to sizes are referenced in the standard's Appendix.



Upper Outerwear with Hood/Neck Drawstrings
for Sale, May 2011

Will they make their way to the U.S. market?

2011 Adjustments for Inspections



2011年《出入境检验检疫机构实施
检验检疫的进出境商品目录》调整表

Drawstring Recalls in the U.S.

More than 524,000 units of children's upper outerwear garments manufactured in China were recalled from 2009 through 2011.



Drawstring Civil Penalties

**Since 2007,
41 companies have been fined
\$3,350,000.00 for drawstring
violations**

U.S. Apparel Imports from China

- In 2010, 41% of U.S. apparel imports came from China
- Increase of Chinese apparel imports from 2006 to 2010: 23%

Smith, CL "Imports of Consumer Products from China and Other Leading Trading Partners." CPSC May 24, 2011

Every Regulated Children's Product Sold in the United States **MUST**



- (1) be third party tested by a CPSC-approved laboratory;
- (2) have a “certificate of compliance;” and
- (3) have a permanent tracking label attached to the product.

Permanent Tracking Labels



Must contain marks that will enable the purchaser to determine:

- ❑ manufacturer or private labeler,
- ❑ production location,
- ❑ date of production, and
- ❑ cohort information (batch number, run number, etc).

Permanent Tracking Labels



All apparel must have permanent tracking labels that comply with the 90 ppm lead limit.

Small Parts = Choking Hazards



Buttons, pompoms, charms, and other decorations must be attached firmly and securely.

Lead Limits—Not Just for Toys!



- Total lead content on accessible parts of children's clothing not to exceed 100 ppm on August 14, 2011 unless the Commission finds that this is not technologically feasible.
- Exemptions are allowed for lead testing in certain fabrics (cotton, polyester, acrylic) only.

Lead Limits—Not just for Toys!

- Exemptions do not apply to other parts of the clothing such as decorations and fasteners (snaps and zippers) made of metal, plastic, vinyl, crystal, and coated leather that might contain lead. These must be third party tested before use in children's clothing.
- Lead in paint and other surface coatings, including screen printing, coated zippers, and all labels, must not exceed 90 ppm.

Lead Limits—Not just for Toys!



Testing for lead in paint and surface coatings (90 ppm) is *in force*.

Testing and certification is required by a CPSC approved laboratory.

Flammability Requirements: General Wearing Apparel



Certain flammability requirements exist for all wearing apparel.

(16 CFR Part 1610)

Certain classes of fabric cannot be used at all in clothing due to rapid, intense burning.

Flammability Requirements for Children's Sleepwear

Sleepwear

Includes pajamas, robes, nightgowns, and loungewear!

Special flammability requirements for children's sleepwear :

See 16 CFR Parts 1615 and 1616

Sizes above 9 months to size 14

Flammability Requirements

Because there are mandatory testing and record keeping requirements in the standards, **all fabrics must be tested.**

- ❑ Polyester USUALLY passes the sleepwear standards, but we are seeing more failures.
- ❑ Cotton and polyester blend fabrics will NOT pass the standard unless treated with a flame retardant chemical.

Tight fitting Sleepwear

Even if exempt from sleepwear standard, must still meet the general wearing apparel standard .

16 CFR Part
1610

Tight fitting garments, as defined by the standards, are exempt from testing requirements.

Permanent neck label that reads:

“Wear snug-fitting, Not Flame resistant”

Drawstring “Target for Extinction” Card



ELIMINATE DRAWSTRINGS FROM CHILDREN’S UPPER OUTERWEAR FOR EXPORT TO THE UNITED STATES

*Do not design or
manufacture children’s upper
outerwear with drawstrings
at the neck, hood or waist.*



U.S. CONSUMER PRODUCT SAFETY COMMISSION

See our Chinese language webpage at:
[http://www.cpsc.gov/businfo/intl/
newsreq_ch.html](http://www.cpsc.gov/businfo/intl/newsreq_ch.html)

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Warning Flier for Distribution to Manufacturers

WARNING!

**DRAWSTRINGS CAN CATCH ON
OBJECTS AND STRANGLE A CHILD!**

**CHILDREN'S OUTERWEAR
MUST ONLY BE
MANUFACTURED FOR AND
EXPORTED TO THE UNITED
STATES IF THERE ARE ...**

- NO drawstrings EVER in the hood and neck area for sizes 2T to 12
- NO drawstrings at the waist and bottom that exceed 75mm when garment is expanded to full width size 2T to 16
- NO toggles, knots, or other attachments at free ends of waist or bottom drawstrings
- Drawstrings at the waist sewn or bartacked when a single cord
- **Must meet ASTM F1816**



Brochure: Highlights of U.S. Children's Clothing Requirements

Drawstrings in Upper Outerwear Must Conform to ASTM F 1816-97.

Always determine sizes using body dimensions specified by ASTM Standard D5219.

Head/Neck Drawstrings

- Do not use drawstrings in hood or at neck for sizes 2T to 12.
- Alternative closures include snaps, buttons, and Velcro.
- Notify customers of these alternatives and do not manufacture upper outerwear with drawstrings for shipment to the United States.

Waist/Bottom Drawstrings

- Drawstrings at the waist or bottom of upper outerwear in sizes 2T to 16 cannot exceed 75mm (3 inches) in length outside drawstring channel.
- No toggles, knots, or attachments on drawstrings.
- Drawstring must be bartacked or sewn to garment if it is one continuous string.



Preserve the integrity and reputation of your factory and the *Made in China* label.

Avoid manufacturing children's clothing that will be refused entry or recalled in the United States:

- Check designs *before manufacture* against all appropriate standards, even designs requested by U.S. importers and retailers. Make modifications for incorrectly designed products to meet standards.
- No drawstrings!
- Buttons, pompoms, charms, and other decorations must be attached firmly and securely.
- Know your supply chain and keep your suppliers informed of technical requirements and your expectations.
- Children's sleepwear (sizes above 9 months up to size 14) have very special requirements—pay close attention to requirements for nightgowns, pajamas, robes, and loungewear.
- Tracking labels are required on all children's clothing. These must be permanent. Hangtags and adhesive labels are not considered permanent.
- Know the proper sizes by fit and dimension and the intended customer for your products. Compare to the appropriate standard.
- Children's clothing **MUST** be third party tested by a CPSC approved laboratory by the manufacturer or importer.
- ALL injuries caused by a product and any product defects that might pose a hazard to consumers or create an unreasonable risk of injury or death must be reported to the CPSC **immediately** by the importer or retailer under U.S. law. Help your customer—alert them to problems and have them alert the CPSC.

This is a simple summary that highlights some children's clothing requirements and standards and does not replace the requirements found in applicable U.S. laws and regulations. It does not include all of the details in those requirements. Please refer to the regulations and requirements on the CPSC website www.cpsc.gov



U.S. Consumer
Product Safety
Commission.

Children's Clothing Requirements in the United States



www.CPSC.gov



**U.S. Consumer Product
Safety Commission**

www.cpsc.gov

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on our website**





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www.cpssc.gov