

U.S. Consumer Product Safety Commission
European Commission

Key Takeaways- Overview of U.S. and European Textile/Apparel Requirements

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The slides in this presentation are intended to be used in a training event with verbal elaboration by a knowledgeable presenter. The slides highlight key U.S. and EU product safety requirements for this discussion. The text is not a comprehensive statement of legal requirements or policy and should not be relied upon for that purpose. You should consult official versions of U.S. and EU statutes and regulations, as well as published CPSC and EU guidance when making decisions that could affect the safety and compliance of products entering U.S. and Europe commerce. Note that references are provided at the end of the presentation.

Key Takeaways –Apparel Requirements

U.S. requirements¹

- Textiles used in wearing apparel must meet minimum flammability requirements.
- Certain apparel items are not included in the scope of the wearing apparel standard.
- Certain fabric constructions, fiber content, and fabric weight are exempted from testing.

EU requirements

- All apparel must be safe according to the General Product Safety Directive (normal use).
- Businesses may use voluntary standards to ensure safety of their products.
- There are specific requirements on flammability for apparel covered by the Personal Protective Equipment (eg: gloves, footwear, firefight jackets, etc.).

Key Takeaways –Apparel Requirements

U.S. requirements²

- Children’s sleepwear must meet more rigorous flammability requirements.
- Certain sleepwear is exempt from the sleepwear flammability test but must meet the clothing textile standard, including:
 - Children’s tight-fitting sleepwear
 - Children’s infant sleepwear

EU requirements

- No specific regulatory requirements on children’s apparel flammability.
- Some requirements on flammability in some EU Member States (eg. UK and NL) related to sleepwear.

Key Takeaways –Apparel Requirements

U.S. requirements

- Children's apparel (including sleepwear) requires a CPC.³
- Children's apparel is subject to requirements in addition to flammability (chemical content,^{4,5,6} tracking labels,⁷ small parts,⁸ drawstrings,⁹ etc.).

EU requirements

- Standards and legislation prescribing certain characteristics for apparel.
- Children's apparels are subject to standards forbidding cords and drawstrings in certain part of the body and/or prescribing certain characteristics for others parts.
- Specific chemical restrictions of hazardous substances for apparel.

Key Takeaways –Apparel Requirements

U.S. requirements	EU requirements
<ul style="list-style-type: none">• Testing must be conducted by an accredited, CPSC-accepted third party laboratory for children's products subject to a federal consumer product safety requirement.¹⁰	

Key Takeaways –Apparel Requirements

U.S. requirements	E.C. requirements
<ul style="list-style-type: none">• Adult apparel requires a GCC, unless it meets an exemption.¹¹• Adult apparel does not require third party testing.	<ul style="list-style-type: none">• Adult apparel does not require third party testing (except for high risk products under PPE).
<ul style="list-style-type: none">• There may be other federal or state apparel requirements beyond CPSC requirements, such as fiber content and care labeling.	<ul style="list-style-type: none">• No requirements on care labelling at EU level (national regulations follow ISO/EN standard).• Labelling requirements on fiber composition at EU level.

U.S. References –Textiles/Apparel

- (1) Clothing Apparel Flammability- 16 CFR part 1610
- (2) Children's Sleepwear Flammability- 16 CFR parts 1615 and 1616
- (3) Testing and Certification-16 CFR part 1107
- (4) Lead Paint-16 CFR part 1303
- (5) Lead Content-16 CFR part 1500
- (6) Phthalates- 16 CFR part 1308
- (7) Product certification and labeling- 15 U.S.C. 2063
- (8) Small Parts-16 CFR part 1501
- (9) Substantial Product Hazard List-16 CFR part 1120
- (10) Third Party Testing Laboratories-16 CFR part 1112
- (11) Certificates of Compliance -16 CFR part 1110

EU References – Textiles/Apparel

EN 14682:2014 – Cords and drawstrings on children's clothing

Regulation (EC) No 1907/2006 - Chemicals