

Lead Review at the CPSC “An Apparel Point of View”

L. Tadd Schwab
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Biography

- ▶ **L. Tadd Schwab**
 - ▶ Former Vice President Little Me Childrenswear (Sales and Quality).
 - ▶ Former Vice President of Quality and Compliance Ralph Lauren Childrenswear.
 - ▶ Member AAFA Childrenswear Committee
 - ▶ Member AAFA Government Relations Committee
 - ▶ Member VICS Floor Ready Committee

Biography

- ▶ Former associate who manages quality and compliance in Asia.
 - ▶ Former associate who manages sourcing and quality in India.
 - ▶ Plant Manager for a respected trim company who produces metal parts for apparel.
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Why is lead used or found in children's and other consumer products? Is it necessary?

- ▶ Lead itself is a metal, however some colorants/dyes or additives may contain lead also as part of the chemistry (lead in the chemical compound).
 - ▶ Lead could be found in paints/ink, the color coating on metals, and also sometimes in metal accessories.
 - ▶ As lead is extremely toxic there is always a substitution for lead in the market, lead is not necessary.
 - ▶ Examples – snaps, grommets, zippers, metal buttons, fabric dyes, screen prints, trims
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What are potential substitute materials for lead? What is known about their toxicities and what kind of testing has been done?

- ▶ For colorants, contractors can easily find colorants in the market which are lead-free, or even, eco-colorants (environmental friendly colorants). They are commonly available in the market.
 - ▶ For metal accessories / parts, we just need to contact the metal suppliers to make sure the metal parts they provide are lead free. We also test the parts for lead.
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What are potential substitute materials for lead? What is known about their toxicities and what kind of testing has been done? CONTINUED

- ▶ **From a Trim Manufacturer**
 - ▶ Lead is a naturally occurring element that is present in many ores and recycled metals that go into brass, copper, steel and other common metals. From our perspective, it has no function and we require vendors to minimize the levels present in our brass.
 - ▶ Depending on the alloy, ASTM specifications allow varying amounts up to and exceeding 600 PPM of lead in brass. Our metal vendors can control their processes and input materials in order to guarantee a maximum of 100 to 200 ppm lead depending on the end use of the parts.
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What are potential substitute materials for lead? What is known about their toxicities and what kind of testing has been done? CONTINUED

▶ **From a Trim Manufacturer – continued**

- ▶ This company does not purchase any Chinese produced metals because of concerns over poor process controls. Though this may change in the future, at this time they have no plans to use any Chinese raw materials in there parts.
 - ▶ In the past, lead was a common component of pigments but of course was phased out years ago in the US and Europe. Lead is still commonly used in paints and pigments produced in China because it is a lower cost material. □
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What are potential substitute materials for lead? What is known about their toxicities and what kind of testing has been done? CONTINUED

▶ **From a Trim Manufacturer – continued**

- ▶ This company uses only US produced paints and pigments and controls all painting operations used on there parts due to concerns that Chinese suppliers would at some point substitute lead in order to reduce cost. Because of this, they will continue to use only US made paints and pigment's despite the increased purchase and freight costs. □
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What are potential substitute materials for lead? What is known about their toxicities and what kind of testing has been done? CONTINUED

▶ **From a Trim Manufacturer – continued**

- ▶ Plated parts - This varies by the type of plating, however for the clothing market white bronze is by far the most prevalent type of plating. The plating process requires "brighteners" in addition to the metals used in the plating.

 - ▶ There are two types of brighteners, one based on organic compounds and the other based on metals. □
 - ▶ The lower cost option is to use metallic based brighteners which normally contain significant amounts of lead. Many of the smaller fastener companies allow the use metallic brighteners in order to lower costs. □
 - ▶ This company, and I believe all the large fastener companies specify the use of only organic brighteners which do not contain lead.
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What are potential substitute materials for lead? What is known about their toxicities and what kind of testing has been done? CONTINUED

▶ **Conclusion by the Trim Company**

- ▶ I don't believe that lead can economically be totally eliminated from metals and coatings, however it can be reduced to or below the levels allowed by law and thought to be safe.
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What are some best practices that can be implemented by the industry to eliminate or reduce the use of lead in children's and other consumer products?

▶ **Best Practice #1**

- ▶ Source from chemical companies, mills, and factories who test for lead and supply your company with appropriate information.
 - ▶ Always ask for test report or certification for the materials sourced.
 - ▶ Test the finished products to see if there is any lead (the materials used maybe safe, but no one knows if there would be any contamination during production). Testing is the key here.
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What are some best practices that can be implemented by the industry to eliminate or reduce the use of lead in children's and other consumer products?

▶ **Best Practice #2**

- ▶ “Key to Compliance” is a training seminar to our US based merchandising and design team, our independent factories, and our overseas employees in sourcing, merchandising and quality.
 - ▶ Establishing company testing standards equal to or greater than retail and government requirements and standardizing them with our testing labs. Insuring that when a factory asked for a knit garment test package that any approved labs would perform the same ASTM tests at the same cost to the factory. Assuring that our company could review all results and approve.
 - ▶ Here is a small taste of the seminar.
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The Updated Key to Compliance



5/15/2008

S. Schwab Company
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A Seminar to Better Understand
the **Government**, **Retailer**, and **Company** Requirements for

Little Me Childrenswear



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Issue

- Children like to pull, yank, twist, bite, their clothing. We as Childrenswear Manufacturers must produce a product that is safe for the customer.
- Our stores need the merchandise on the floor immediately. We as Manufacturers must work with them to be compliant to the standard they set.

Why Should You Care?

If you work for Schwab:

It is part of our job to ensure all of our products meet government, retailer and our own compliance standards.

If you are a factory:

If you do not comply we cannot do business with you.

Types of Compliance

- **Government Compliance**
 - Issues like Flammability, Drawstring, and Care labeling
- **Retailer Compliance**
 - Meeting standards for “Floor Ready” and “DC easy”
- **Schwab Compliance**
 - Safety, Product Testing, and Quality

The Process



Schwab Compliance



As a childrenswear manufacturer we must be very conscious that our customer is a child. We must create a product with this young child in mind. Injury to the child must be prevented at all costs.

The quality of our product is very important to us. Our customers expect a level higher than the industry standard.

We will not accept product that does not meet SCHWAB COMPLIANCE STANDARDS

What are some best practices that can be implemented by the industry to eliminate or reduce the use of lead in children's and other consumer products?

▶ **Best Practice #3**

▶ CPSC Children's Sleepwear Regulation

- ▶ The regulation was established in 1972 – and took years of discussion and change to develop what we have today.
 - ▶ We had many growing pains over the years for example the TRIS recall.
 - ▶ Pros: Manufacturers pay close attention to the factories that are chosen to produce the product. Testing companies around the world are knowledgeable and work closely with factories. Product meets the standards.
 - ▶ Cons: It is hard to prevent new companies and companies not aware of the law from shipping product into the market. Each season product shows up in the market from companies unaware of the law. Better enforcement and education are essential.
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What are the differences, if any, between domestic manufacturing plants and their practices and those outside the U.S.?

- ▶ When we produced product in the USA the mills were more knowledgeable regarding the regulations for doing business in the USA. They were not perfect. Manufacturers created partnerships with the mills. Mills could be trusted.
 - ▶ Globally there should be no difference but there is.
 - ▶ Factories and mills do not understand the requirements of products produced in the USA. This includes CPSC/Safety requirements, FTC requirements, and Retail requirements.
 - ▶ Factories/Mills need to be educated on the ramifications of poor product integrity. These include everything from government recalls and fines to retail chargeback's due to late delivery not to mention the health of the consumer.
 - ▶ Factories sometimes use different materials for proto's then they use during mass production. They may use good/safe material for making the proto's, to pass the testing. Then they want to cut cost and substitute the good material with a cheap one which may not comply with the requirements. It is impossible to test every single lot of the same style. A better partnership is needed.
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Conclusion

- ▶ Standards may be needed for lead and other chemicals or safety issues that may harm the people who wear garments containing them. Proper testing prevents problems.
- ▶ Education both here in the United States and overseas in factories is required to better educate people on compliance requirements. Hopefully this will also provide a better working relationship between partners.
- ▶ Product Integrity can be defined as delivering a competitively priced product in a timely manner that is safe and meets a quality standard you set for your company, as well as government and retail compliance standards. ALL products must meet this criteria.
- ▶ Work by the AAFA Committee on the restricted substance list has helped the industry better understand these problems and work together to solve them.

