

## Drawstrings in Children's Upper Outerwear Must Conform to ASTM F 1816

### Upper Outerwear

- Is defined by CPSC as clothing such as jackets, ski vests, anoraks, and sweatshirts that generally are intended to be worn over other garments.
- Includes lightweight outerwear that is appropriate for use in warmer climates.
- Excludes underwear, inner clothing layers, pants, shorts, swimwear, dresses and skirts.

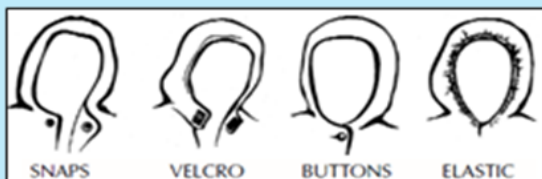
### Head/Neck Drawstrings

- Drawstrings are **not allowed** at the hood and neck area on children's upper outerwear in sizes 2T through 12.
- Children's upper outerwear should use alternative closures such as snaps, buttons, and Velcro.
- Fully retractable drawstrings are permitted and are exempt from the drawstring requirements. They must completely and automatically retract into the garment after being adjusted and released.

### 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.
- Cord locks, knots, toggles, or other attachments that could pose a catch hazard at the free ends of drawstrings are prohibited.
- Drawstrings that are one continuous string must be bar tacked or stitched through to prevent the drawstring from being pulled through its channel.

Notify suppliers of these requirements and do not manufacture upper outerwear with drawstrings for shipment to the United States.



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

- Check garment prototypes *before manufacture* against all appropriate standards, even designs requested by U.S. importers and retailers. Make modifications for incorrectly designed products to meet U.S. standards.
  - ⇒ **Third Party Testing**
  - ⇒ **Children's Product Certification**
  - ⇒ **Flammability Requirements for General Wearing Apparel**
  - ⇒ **Flammability Requirements for Children's Sleepwear**
  - ⇒ **Lead Content Requirements**
  - ⇒ **Lead in Paint Surface Coating Requirements**
  - ⇒ **Phthalates Requirements**
  - ⇒ **Drawstring Requirements in Children's Upper Outerwear**
- Tracking information is required on all children's clothing. The information must be permanent. Hangtags and adhesive labels are not considered permanent.
- Know your supply chain and keep your suppliers informed of technical requirements and your expectations.
- ALL products that have a defect and may 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.

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](http://www.cpsc.gov). This summary has not been reviewed or approved by the Commission.

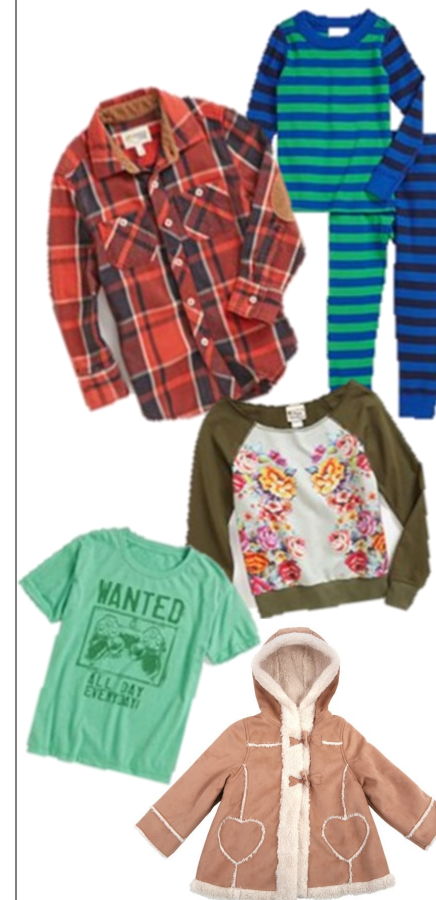


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U.S. Consumer  
Product Safety  
Commission

## Children's Clothing Requirements in the United States



[www.CPSC.gov](http://www.CPSC.gov)

## General Requirements for Children's Clothing in the United States

### Testing and Certification

- Testing and certification by a CPSC-recognized third-party laboratory is required for all applicable requirements including flammability, lead and phthalates.
- Children's product manufacturers and importers must certify in a Children's Product Certificate (CPC) that their products comply with all applicable requirements.

### Small Items On Children's Clothing



- Fabrics and buttons are exempted from small parts testing requirements.
- Buttons should be affixed securely.
- Buttons that fall off due to poor attachment and quality control may pose a choking hazard or be a defect. Report this immediately as a possible hazard to the CPSC.
- The Federal Trade Commission (FTC) has labeling laws for apparel. Contact the FTC at [www.ftc.gov](http://www.ftc.gov).

## Flammability Requirements for Clothing Under the Flammable Fabrics Act (FFA)

All wearing apparel and clothing textiles must comply with **16 C.F.R. Part 1610**.

### Exceptions include:

- Some hats, some gloves and mittens, and some footwear.
- Certain fabrics, due to their construction, fabric weight, or fiber content. The exemptions are for plain surface fabrics regardless of fiber content which weigh at least 2.6 ounces per square yard AND fabrics with plain or raised fiber surfaces regardless of weight which are made entirely or in combination of specific types of fibers, e.g., polyester, nylon, see § 1610.1(d).

### Prohibited textile fabrics include:

- Class 3 fabrics that exhibit rapid and intense burning are prohibited and must not be used for clothing. Certain sheer rayon or silk, rayon chenille, and some raised surface fabrics may be prohibited. See 16 C.F.R. Part 1610 for complete details.



- **Children's sleepwear must comply with the stringent requirements in 16 C.F.R. Parts 1615/1616.** These requirements are **strictly enforced** and cover nightgowns, pajamas, robes, and loungewear sizes above 9 months to size 14.
- The CPSC will enforce the law based upon the intended or likely use of the garment. Labeling a product as "not intended for sleepwear" will NOT automatically exempt it from the sleepwear requirements.

## Lead and Phthalate Requirements for Children's Clothing

### Lead Limit Requirements

- Total lead content on accessible parts of children's clothing (e.g., buttons, zippers, and snaps, and other fasteners) must not exceed 100 ppm.
- Paint and other surface coatings, including screen printing and paint and coatings on snaps and zippers are subject to ban on lead in paint and surface coatings must not exceed 90 ppm.
- Must be tested for conformity by a CPSC-recognized third party accredited laboratory.

### Exemptions for lead content testing:

- Dyed or undyed textiles and nonmetallic thread have been determined to not exceed lead limits and are not required to be third party tested.
- Exceptions do **not** apply to other parts of the clothing such as metallic thread and decorations and fasteners (snaps and zippers) made of metal, plastic, vinyl, crystal, and coated leather that might contain lead. These must be tested by a third party laboratory accepted by the CPSC, if used in children's clothing.

### Phthalates Requirements

- Sleepwear for children under 3 with plasticized parts or certain prints/thermal transfers are subject to phthalate requirements.

For more information on children's requirements: [www.cpsc.gov/clothing](http://www.cpsc.gov/clothing)