



United States
CONSUMER PRODUCT SAFETY COMMISSION
Washington, D.C. 20207

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'95 OCT -6 P4:14

BALLOT VOTE SHEET

DATE: OCT -6 1995
SAFETY COMMISSION

TO : The Commission
Sadye E. Dunn, Secretary

FROM : Eric A. Rubel, General Counsel *ER*
Stephen Lemberg, Assistant General Counsel *SL*
Patricia M. Pollitzer, Attorney, OGC *PMP*

SUBJECT: Safety Guidelines for Drawstrings on Children's Clothing

Ballot Vote Due OCT 17 1995

Attached is a briefing package in which the staff recommends that the Commission issue safety guidelines for drawstrings on children's clothing. The staff provides draft guidelines at Tab H of the package. The staff may make changes to the layout and precise wording of the draft guidelines. The staff will obtain Commissioners' approval of final guidelines.

Please indicate your vote on the following options.

I. Approve issuing safety guidelines for drawstrings on children's clothing.

Signature

Date

II. Approve issuing safety guidelines for drawstrings on children's clothing, with the following changes (please specify): _____

Signature

Date

NOTE: This document has not been reviewed or accepted by the Commission.

Page 1 of 2

Initial rh Date 10/6/95

CPSA 6 (b)(1) Cleared

☒ No Ints./Priv. Lbls. or
Products Identified

Excepted by

Firms Notified

Comments Processed.

III. Do not approve issuing safety guidelines for drawstrings on children's clothing.

Signature

Date

IV. Take other action (please specify): _____

Signature

Date

Attachments



BRIEFING PACKAGE

Safety Guidelines for Drawstrings on Children's Clothing

For Further Information Contact:

Deborah K. Tinsworth
Project Manager
Division of Hazard Analysis
Directorate for Epidemiology & Health Sciences
(301) 504-0470 ext. 1276

NOTE: This document has not been
reviewed or accepted by the Commission.

Initial rlh Date 10/6/95

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Attachments

Tab A	CPSC News Release, "CPSC Works with Industry to Remove Drawstring Hazard," July 7, 1994
Tab B	Memorandum from Suzanne P. Cassidy, EHHA, to Deborah K. Tinsworth, EHHA, entitled, "Children's Clothing Drawstrings," September 27, 1995
Tab C	Memorandum from Celestine M. Trainor, ESHF, to Deborah K. Tinsworth, EHHA, entitled, "Human Factors' Analysis of Drawstrings on Children's Garments," September 28, 1995
Tab D	Memorandum from Kimberly Long, EHHA, to Ronald Medford, Assistant Executive Director, Office of Hazard Identification and Reduction, entitled, "Results of Retail Store Survey on Children's Outerwear with Drawstrings," September 8, 1995
Tab E	Memorandum from Jean Kennedy, CCA, to Deborah Tinsworth, EHHA, entitled "Chronology of Compliance Actions to Address Hazards of Drawstrings on Children's Clothing," September 28, 1995

- Tab F Letter from Deborah Tinsworth, Directorate for Epidemiology and Health Sciences, to John A. Blair, Du Pont Polymers, regarding Drawstrings on Children's Clothing (ASTM F15.37), August 22, 1995.
- Tab G Children's Clothing (Hood Cords) Regulations, 1976 (United Kingdom)
- Tab H Draft CPSC Safety Guidelines for Drawstrings on Children's Clothing

EXECUTIVE SUMMARY

This briefing package presents safety guidelines proposed for use in addressing drawstring hazards associated with children's clothing, and provides information on related Consumer Product Safety Commission (CPSC) staff activities.

Since 1985, CPSC has received reports of 17 deaths and 42 non-fatal incidents involving the entanglement of children's clothing drawstrings. The victims ranged in age from 14 months through 14 years. The majority of incidents involved drawstrings on jackets, coats, and sweatshirts. Most frequently, drawstrings were reported to have been on the garment hood, although other locations, such as the neck/collar or waist/bottom of the garment, were also reported. In most cases, the drawstring became caught on another product, frequently a playground slide or a schoolbus handrail. Drawstrings at the hood or neck were usually involved in strangulation incidents. Waist/bottom strings were frequently involved in vehicular dragging incidents in which older children were injured.

In response to these types of incidents, CPSC Chairman Ann Brown held a press conference on July 7, 1994 to announce cooperative CPSC/industry efforts to remove drawstrings from the hoods and necks of children's garments. Twenty-eight manufacturers and four retailers agreed to cooperate in this effort. Specifically, it was agreed that garments without drawstrings would be available to consumers beginning with the Spring or Fall 1995 clothing lines.

Staff is currently participating in the development of an ASTM voluntary safety standard to address children's clothing drawstring hazards. However, staff believes that approaches now being considered for inclusion in the standard will not eliminate drawstring hazards, and that publication of an effective standard is not likely to occur in the near future. A CPSC survey of retail stores suggests that most children's upper outerwear garments are now being sold without drawstrings at the neck area. However, without a safety standard in effect, it is likely that some garments with drawstrings will continue to be produced.

Staff recommends issuing safety guidelines to inform consumers, retailers, and manufacturers about the potential entanglement hazards posed by drawstrings on children's clothing. Staff believes that the public is not aware of the hazards associated with drawstrings on children's garments, and that incidents will continue to occur unless some action is taken. Guidelines would provide consumers and others with information on addressing hazards with garments now in their possession and help them to make informed purchasing choices in the future.



United States
CONSUMER PRODUCT SAFETY COMMISSION
Washington, D.C. 20207

MEMORANDUM

DATE: OCT -6 1995

TO : The Commission
Sadye E. Dunn, Secretary

Through: Eric A. Rubel, General Counsel *EAR*
Bertram R. Cottine, Executive Director *BT*

FROM : Ronald L. Medford, Assistant Executive Director, *RLM*
Hazard Identification and Reduction
Deborah K. Tinsworth, Project Manager, *DKT*
Directorate for Epidemiology and Health Sciences

SUBJECT: Children's Clothing Drawstring Safety Guidelines

This memorandum presents safety guidelines proposed for use in addressing drawstring hazards associated with children's clothing, and provides information on related Consumer Product Safety Commission (CPSC) staff activities.

I. BACKGROUND

In response to reports of deaths and near-strangulations related to clothing drawstring entanglement, CPSC Chairman Ann Brown held a press conference on July 7, 1994, to announce cooperative CPSC/industry efforts to remove drawstrings from the hoods and necks of children's garments. Twenty-eight manufacturers and four retailers agreed to cooperate in this effort. Specifically, it was agreed that garments without hood and neck drawstrings would be available to consumers beginning with the Spring or Fall 1995 clothing lines (TAB A).

Following this agreement, Commission staff requested ASTM (formerly known as the American Society for Testing and Materials) to initiate a voluntary standard to address drawstring hazards on children's clothing. On September 12, 1994, ASTM held an organizational meeting in which participants agreed to proceed with the establishment of safety provisions. Staff is currently participating in the development of the ASTM standard. However, staff believes that approaches now being considered for inclusion in the standard will not eliminate drawstring hazards, and that publication of an effective standard is not likely to occur in the near future.

NOTE: This document has not been
reviewed or accepted by the Commission.
Initial *RLM* Date *10/6/95*

CPSA 6 (b)(1) Cleared
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Products Identified
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Notified.

A CPSC survey of retail stores suggests that most children's upper outerwear garments are now being sold without drawstrings at the neck area. However, staff believes that additional guidance on drawstring hazards should be provided to the public, particularly consumers who may have garments with drawstrings and may need information to make informed choices about garments they purchase in the future.

II. DISCUSSION

A. Incident Data

Since 1985, CPSC has received reports of 17 deaths and 42 non-fatal incidents involving the entanglement of drawstrings on children's clothing (TAB B).¹

The victims ranged in age from 14 months to 14 years. Almost all of the incidents involved drawstrings on jackets, coats, and sweatshirts. Most frequently, drawstrings were reported to have been on the garment hood, although other locations, such as the neck/collar or waist/bottom of the garment, were also reported. In a number of cases, a bead, toggle, or knot was reported to have been present on the drawstring.

For all of the deaths, and most of the non-fatal incidents, the drawstring became caught on another product. Playground slides were involved in over one-half of the incidents in which a second product was involved. Other products included schoolbuses (primarily the bus handrail), cribs, an escalator, a fence, a farm grinder, a turn signal lever, a ski chairlift, and a tricycle.

In general, two modes of injury were involved. The entanglement of hood or neck drawstrings on other products usually resulted in strangulation or near-strangulation. The entanglement of waist/bottom drawstrings on schoolbuses resulted in injuries related to being dragged or run over. The victims of vehicular dragging were generally older than those involved in strangulation incidents.

B. Human Factors' Evaluation of Hazards

The Division of Human Factors' (ESHF) evaluation of clothing drawstring hazards indicates that it is not possible to specify a "safe" length of string that could be used at the hood or neck of

¹The identified cases may not be the total number of incidents that have occurred, and were not a sample with known probability of selection. Nevertheless, they provide useful information about the involvement of clothing strings in entanglement incidents that have occurred in the United States in recent years.

children's garments.² Therefore they recommend that no drawstrings be used at the neck area of children's outerwear. However, the incident scenarios with drawstrings at the waist or bottom of outerwear garments principally involved handrails on school buses, and ESHF believes that short drawstrings may be acceptable at these areas (TAB C).

Drawstrings at the hood or neck area pose a strangulation hazard. The drawstring does not have to encircle the child's neck for injury or death to occur. Once a drawstring is caught, it is possible for a garment that is zippered or buttoned (partially or completely) to slide up and put sufficient pressure across the child's neck to cause injury or death.

The various ways in which hood or neck drawstrings could be exposed to potential catchpoints cannot be fully predicted, because children typically are very active and creative in their play. The potential for entanglement may increase when strings are pulled through the drawstring channel and the exposed portions become considerably longer. Even when bartacked, drawstrings may not retract to their original length when untied.

Without continuous adult supervision, rescue may not occur in sufficient time to avoid injury or death. In the strangulation-related incidents reported, the child frequently appeared to have been hanging too far from the catchpoint to free the drawstring or suspended in such a way that the child was unable to slip out of the garment unassisted.

ESHF staff believes that short drawstrings (no longer than 3 inches) may be acceptable at the waist or bottom of garments. Drawstrings in these areas of children's outerwear garments have been involved in vehicular dragging incidents. In these cases, long drawstrings became caught on schoolbus handrails or other components as the children disembarked. The children were off the bus and out of the driver's view before the entanglement was discovered.

Shortening waist or bottom drawstrings should lessen the chances of entanglement. Eliminating toggles and knots at the ends of drawstrings should further reduce the potential for entanglement. However, staff believes that it may be difficult

²In July 1994, CPSC issued a press release which recommended that consumers remove drawstrings completely or sew the string at the middle of the hood and cut the strings as short as needed to close the garment. This recommendation was made to provide consumers with a means of making garments currently in the home safer until new garments were available. Garments with alternative closures were generally not available to consumers at the time. Now that alternatives are more widely available, consumers are encouraged to use garments without hood/neck drawstrings.

to prevent consumers from deciding to add knots to waist strings.³ If a short drawstring becomes caught, the child would not be able to get completely off a bus before the entanglement is discovered. In these cases, adult supervision and assistance (the driver) would be available to correct the situation.

C. Retail Survey

In an effort to evaluate the extent to which the Fall 1995 line of children's outerwear is being sold without drawstrings at the hood or neck area, CPSC Field staff conducted a survey of retail outlets from July 17 through August 14, 1995 (TAB D).

Field staff visited 130 stores throughout the northern tier of the United States, where the fall line would most likely be available for sale during this time period. Of these, 43 percent were discount/mass merchants, 29 percent were department stores, and 28 percent were children's specialty stores.⁴ These stores were in 63 different cities and 19 different states, and were considered to be a representative sampling of the types of stores selling children's clothing in the U.S.

Specifically, the investigators were asked to report whether the retail store contained jackets and sweatshirts with drawstrings at the neck area in children's sizes 2 through 12 for each store visited.

Overall, about 70 percent of the stores visited did not contain children's outerwear garments with drawstrings at the hood or neck. Where stores were selling clothing with drawstrings, most were observed to have relatively few such garments. It was also reported that many stores having garments with drawstrings were discount merchants who sell discounted garments from department stores and specialty chains. Many of these garments were reported to have been on clearance racks and may have been last year's merchandise.

D. Directorate for Compliance Activities

In April 1994, the Directorate for Compliance (EXC) staff met with manufacturers and retailers of children's clothing to discuss possible ways to address drawstring hazards (TAB E). This activity culminated in the July 7, 1994, press conference previously discussed.

³Human Factors' staff indicates that warning labels and hang tags are not likely to be effective in changing consumer's behavior in regard to adding knots to clothing drawstrings.

⁴The types of stores Field staff was directed to visit were based on the market shares for these three categories of stores, as provided by CPSC's Directorate for Economics.

Since that time, 33 manufacturers and 4 retailers have committed to having their names published as using no drawstrings on hoods or necks of children's jackets and sweatshirts. However, information available to EXC's Division of Corrective Actions (CCA) indicates that many other retailers and manufacturers have joined the effort to voluntarily change designs and sell outerwear garments without drawstrings on hoods or necks. Additionally, some have voluntarily shortened and bartacked jacket waist and bottom drawstrings.

CCA has been told informally by a number of manufacturers that the cost of jackets with alternative closures, such as elastic, snaps, or velcro, was generally no different than with drawstrings and toggles.

E. Voluntary Standards

At the request of Commission staff, ASTM established Subcommittee F15.37, Drawstrings on Children's Clothing, in September 1994. The intent of this Subcommittee was to develop a voluntary safety standard to address entanglement and strangulation hazards to children from drawstrings on clothing. The Subcommittee approved the use of ASTM provisional standard-setting procedures to expedite publication of the standard.

In April 1995, the Subcommittee issued a ballot for a provisional standard that permitted 2-inch drawstrings at the neck area of children's upper outerwear. In May 1995, CPSC staff responded by letter to the ballot, stating that there was no technically supportable rationale for the proposed 2-inch requirement and that staff would recommend the removal of drawstrings at the neck area until information could be developed to indicate that any length of string was safe. Staff also recommended that the standard include requirements to address vehicular dragging hazards associated with drawstrings at the waist and bottom of upper outerwear garments.⁵ At a June 1995 Subcommittee meeting, the ballot was withdrawn so further technical work could be undertaken.

On August 18, 1995, a new ASTM ballot was issued that permitted the use of 4- and 5-inch drawstrings at the neck area, and included requirements to address hazards associated with

⁵The National Highway Traffic Safety Administration (NHTSA) is addressing this problem through a recall of schoolbus handrails. Information from investigations of entanglement incidents, however, suggests that compliance with the NHTSA recall has not been uniform nationwide. Also, certain replacement handrails installed by bus manufacturers may not eliminate all string entanglements. Therefore, staff continues to believe that requirements addressing the risk of entanglement with waist and bottom strings are necessary. NHTSA staff has been supportive of CPSC's position on this issue.

waist and bottom drawstrings.⁶ On August 22, 1995, CPSC staff responded to the August 18th ballot, indicating that 1) the staff continues to oppose the use of drawstrings at the neck area of children's upper outerwear, and that 2) staff was in agreement with the inclusion of requirements for waist and bottom drawstrings (TAB F).

At a September 22, 1995, meeting of the Subcommittee, it was determined that the proposed standard did not receive sufficient affirmative votes to qualify as a valid ballot, and the draft standard was withdrawn.⁷ A task group was formed to explore the possibility of having an independent testing laboratory develop safety requirements to address clothing string hazards. The next Subcommittee meeting is tentatively scheduled for November 30, 1995.

Based on the Subcommittee's progress so far, CPSC staff does not believe that an effective ASTM standard to address clothing string hazards will be published in the near future.

F. Other Standards

Staff is not aware of any published U.S. clothing standards dealing with the string entanglement hazard. However, the United Kingdom's 1976 mandatory requirements prohibit the sale of children's outer garments [i.e., raincoats, overcoats, anoraks (parkas), or other garments suitable for use as outerwear⁸] having a hood "designed to be secured by means of a cord drawn through the material." This standard only addresses potential hazards of strings on hoods, rather than around the neck or other locations. In addition, the sizes of the garments within the scope of the standard are defined by specific measurements that may be affected by changes in clothing styles (TAB G).

⁶It was proposed that waist and bottom drawstrings shall:
1) not exceed 3 inches in length outside the drawstring channel when the channel is fully extended; 2) have no toggles, knots or other attachments at the free ends; 3) have the free ends finished to not exceed the diameter of the drawstring; 4) be bartacked; and 5) not form a continuous loop.

⁷The August 18, 1995, ballot was sent to 101 members of the ASTM Subcommittee. A total of 81 ballots were returned; these included 22 negative votes, 34 affirmative votes, and 25 abstentions.

⁸Outer garments within the scope of this standard must have "a measurement not exceeding 44 cm across the chest when the finished garment is laid out as flat as possible without distorting its natural two-dimensional shape and buttoned or otherwise fastened as it is designed to be in normal wear."

G. Guidelines

The clothing items addressed by the proposed safety guidelines are children's upper outerwear, such as jackets and sweatshirts. Of concern are strings, cords, ribbons, fabric ties, or similar features that may pose strangulation and vehicular dragging hazards to the user (TAB H).

The draft guidelines recommend elimination of drawstrings at the hood and neck area of children's upper outerwear garments, sizes 2T through 12. The guidelines also recommend that drawstrings at the waist or bottom of upper outerwear garments (sizes 2T through 16) extend no longer than three inches outside the garment, that they are bartacked at the midpoint so the length of the drawstring cannot be pulled to one side, and that there are no knots or toggles on the ends of the drawstrings.

In the absence of mandatory or voluntary safety standards to address drawstring entanglement hazards, parents and other consumers need information to make educated choices about the safety of garments they may have or will purchase in the future. Safety guidelines would provide this information. While a number of manufacturers and retailers appear to be taking steps to address clothing drawstring hazards, there is no assurance that this trend will continue.

Distribution of the guidelines can be accomplished in a variety of ways. A news conference would be held to "kick off" media awareness to the issue of drawstring hazards and to announce the availability of the guidelines. A safety alert that provides highlights of the guidelines and information on how consumers, retailers, and others can obtain a copy could be developed. Such an alert would go to pediatrician offices, action line reporters, and others on CPSC's safety alert distribution list.

The guidelines and safety alert also can be shared with other health and safety and child advocacy groups for distribution to their networks. Copies can be sent to the U.S. Department of Health and Human Services (HHS) for distribution to consumers through their various child care programs. Each of the approaches would expand public knowledge of the guidelines and extend the channels of distribution.

The draft guidelines as they appear at TAB H do not contain any graphics, and the format may be revised to improve its presentation. At this time, the staff is requesting Commission approval to issue the guidelines containing the policy statements that have been drafted.

IV. OPTIONS

The following options are available to the Commission:

1. Issue the proposed safety guidelines for drawstrings on children's clothing as drafted.
2. Issue the proposed safety guidelines for drawstrings on children's clothing with changes as directed by the Commission.
3. Do not issue the proposed safety guidelines for drawstrings on children's clothing.

V. RECOMMENDATIONS

The Commission staff recommends issuing safety guidelines to inform consumers, retailers, and manufacturers about the potential entanglement hazards posed by drawstrings on children's clothing. Staff believes that consumers are not aware of the hazards associated with drawstrings on children's garments, and that incidents will likely continue unless some action is taken to modify garments.

Staff believes that approaches now being considered for inclusion in an ASTM voluntary standard will not eliminate drawstring hazards, and that completion of an acceptable voluntary standard is not likely to occur in the near future. While it appears that most children's upper outerwear garments are now being sold without drawstrings at the neck area, staff believes that some will continue to be available, particularly until existing inventories are depleted. Without a safety standard in effect, it is also likely that some garments with drawstrings will continue to be produced. Staff believes that consumers need guidance in addressing hazards associated with the multitude of older garments with drawstrings that may now be in their possession and information on the types of garments to purchase in the future.

Staff does not recommend a mandatory standard since industry appears to be substantially moving toward the removal of hood and neck drawstrings. Staff also believes that product recalls would not be practical or effective because of the great volume of garments with drawstrings produced in past years by numerous manufacturers.

TAB A

NEWS from CPSC

U.S. CONSUMER PRODUCT SAFETY COMMISSION

OFFICE OF INFORMATION AND PUBLIC AFFAIRS

WASHINGTON, D.C. 20207

FOR IMMEDIATE RELEASE

July 7, 1994

Release #94-103

CONTACT: Elaine Tyrrell

(301) 504-0580 ext. 1191

CPSC WORKS WITH INDUSTRY TO REMOVE DRAWSTRING HAZARD

Washington, D.C. - The U.S. Consumer Product Safety Commission (CPSC) announced today a major cooperative effort with manufacturers and retailers to protect America's children by removing drawstrings from the hoods and necks of children's clothing. Drawstrings on children's jackets, sweatshirts, a hooded T-shirt, and a cape, which caught on playground equipment, an escalator, a fence, cribs, and other products, were associated with at least 12 deaths and 27 near-strangulations since 1985.

CPSC Chairman Ann Brown said, "This collaborative effort between the commission and industry epitomizes government for the '90s. We asked industry to make the clothing safer, and they agreed to make the change, all in record time."

The deaths and injuries, which involved children between the ages of 15 months and 11 years, occurred all over the country in larger cities like Washington, Indianapolis, and Ann Arbor, Mich. and small communities like Guymon, Okla., Peters Creek, Alaska, and Elkhorn, Iowa.

The CPSC is working with industry to change children's clothing to prevent entanglement and deaths. The following manufacturers and retailers have agreed to modify or eliminate drawstrings from hoods and necks of children's clothing. Some will make changes this fall. Others are eliminating the hood and neck drawstrings from their spring or fall '95 lines:

- * Haddad Apparel Group, New York: Mighty Mac, Bugle Boy, Hush Puppies, Weebok, Winning Goal-NHL, Touchdown, Club-NFL, Billy the Kid, Barbie for Girls, Barney the Dinosaur, Mickey & Co., and others.
- * Nike, Inc., Beaverton, Ore.: Nike windwear, jackets, outerwear, sweatshirts, hooded T-shirts.
- * Oshkosh B'Gosh, Inc., Oshkosh, Wis.: Oshkosh B'Gosh, Baby B'Gosh, Genuine Kids.

-more-

- * M&L International, Chicago.: OshKosh B'Gosh children's outerwear, Weather Tamer.
- * Pyramid Handbags, New York: Hooded Raincoats with Walt Disney's The Lion King, Aladdin, Beauty and The Beast, The Little Mermaid, The NBA, Biker Mice from Mars, and others.
- * Baby Guess/ Guess Kids, Los Angeles: sportswear.
- * Angelique Imports, New York: Little Angels.
- * Columbia Sportswear Co., Portland, Ore.: manufacturer of skiwear, outerwear and sportswear.
- * Levi-Strauss & Co., San Francisco: infants, Little Levi's, girls, boys.
- * L.L. Bean, Freeport, Maine: L.L.Kid's.
- * Walter Jerome Inc., New York: Tidykins, Polara, Rocky Mountain Expedition.
- * Toma Outerwear Inc., Seattle: Toma, Field & Stream.
- * S. Rothschild & Co., New York: Below Zero, Pro Score, Kute Kiddie, Fieldston, Izzi's Kids, Rothschild.
- * Bassett-Walker, Martinsville, Va.: Lee, Riders activewear.
- * Imp Originals Inc., New Rochelle, N.Y.: children's coats.
- * Hampton Industries, Inc., Kinston, N.C.: J.G. Hook, Campus, Kaynee, Le Tigre boys clothing.
- * Cherry Tree, Providence, R.I.: Cherry Tree outerwear, skiwear, and sportswear.
- * Hanna Andersson, Portland, Ore.: children's cotton clothing through direct mail order.
- * Mercantile Stores Company Inc., Fairfield, Ohio: retail stores in the south and midwest.
- * Lands' End Inc., Dodgeville, Wis.: children's clothing through direct mail order.

Great Britain passed a regulation banning strings on hoods in 1976, following three strangulation deaths of children from drawstrings.

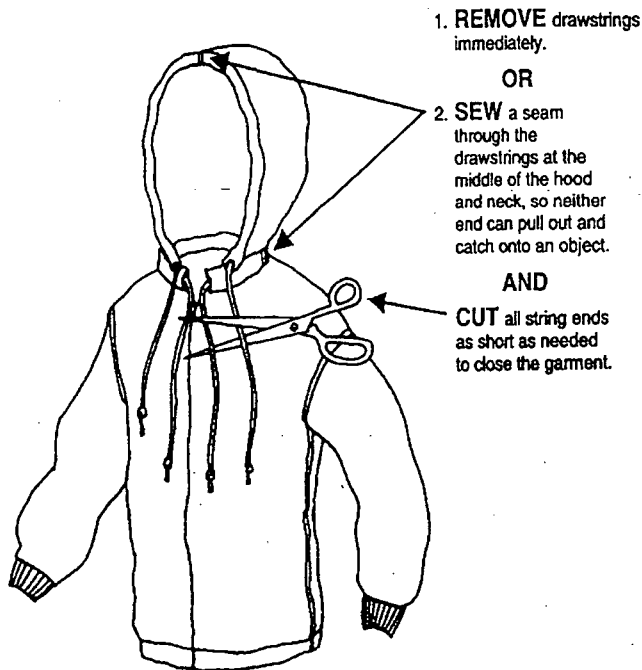
Today's actions will eliminate the strings from more than 20 million garments annually in the future. However, for garments recently purchased or currently in homes, the CPSC urges that parents and caregivers immediately:

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* **Remove** hood and neck drawstrings from children's jackets, sweatshirt and similar types of clothing; **or**

* **Sew** a seam through the drawstring at the middle of the hood and neck so neither end can pull out and catch onto an object.

And cut all string ends as short as needed to close the garment.



Thelma Sibley, the mother of five-year-old Nancy Sibley who was strangled by her hood drawstring on her elementary school slide in January, joined Chairman Brown today to emphasize the danger. Sibley would like parents to know that this is not a freak accident; it could happen to any child and can and should be prevented.

Other manufacturers and retailers are developing plans for changing all their designs so that the Commission can add these companies to the list. Manufacturers and retailers should call the Commission's Compliance staff at 301-504-0608 x1485 to join this voluntary safety effort.

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NOTE: To report an incident involving a drawstring on children's clothing, an unsafe consumer product, or a product-related injury, please call the U.S. Consumer Product Safety Commissions toll-free hotline at 1-800-638-2772. A teletypewriter for the hearing and speech impaired is available at 1-800-638-8270.

TAB B



United States
CONSUMER PRODUCT SAFETY COMMISSION
Washington, D.C. 20207

MEMORANDUM

DATE: SEP 27 1995

TO : Deborah K. Tinsworth
Project Manager, EHHA

Through: Robert E. Frye, Director, Hazard Analysis Division, EHHA *RF*

FROM : Suzanne P. Cassidy, EHHA *SKT for SPC*

SUBJECT: Children's Clothing Drawstrings

This memorandum provides data on deaths and non-fatal incidents involving the entanglement of children's clothing drawstrings. Information was obtained from a review of the Consumer Product Safety Commission's (CPSC) files of in-depth investigations, death certificates, medical examiner and coroner reports, newspaper clippings, consumer complaints, and other reports. Data was also obtained from the National Highway Traffic Safety Administration (NHTSA).

From 1985 through September 1995, the Commission received reports of 17 deaths and 42 non-fatal drawstring entanglement incidents involving children under age 15.¹ The victims ranged in age from 14 months through 14 years.

The majority of garments were described as upper outerwear types of clothing such as jackets, coats, and sweatshirts.² In most cases, the strings were reported to be in the hood of the clothing. In other cases, the strings were reported to be located at the neck of the garment, around the waist, or at the bottom of the garment. Where reported, the strings frequently had toggles, beads, or knots at the ends. These components were often described as the part of the string that became entangled.

¹These cases do not represent the total number of incidents that may have occurred, nor are they based on a sample with known probability. They do, however, provide information about the types of clothing string incidents that have occurred in the United States during the past 10 years.

²Two T-shirts, two pairs of pants, a nightgown and a cape were also involved.

In most cases, the clothing strings caught on another product.³ Sliding boards were reported as the other product in 33 incidents, including 5 that resulted in death. School buses (usually the handrail on the bus) were involved in 12 incidents, including 4 deaths. Other products involved in fatalities were cribs (3 deaths), an escalator, a turn signal lever on a truck, a fence, a farm grinding machine, and a stair railing. Other products involved in non-fatal incidents included a tricycle, a ski chair lift, and an unidentified item of playground equipment.

Strings at the neck or hood of garments were involved primarily in strangulation types of incidents. Strings at the waist or bottom of garments were most often involved in vehicular dragging incidents. In general, victims involved in dragging types of incidents were older than those involved in strangulation incidents. For example, victims who were dragged by school buses ranged in age from 6 through 14 years, as compared to 21 months through 8 years for victims injured on sliding boards.

³In three non-fatal incidents it was reported that young victims (ages 16-, 23-, and 24-months) became entangled in the garment strings, with the involvement of another product not reported.

Additional Comments

Many stores where garments had drawstrings were discount merchants, merchants that sell discounted garments from department stores and specialty chains. These garments were reported to have been on clearance racks and may have been last year's merchandise. In stores where outerwear garments with drawstrings were found, the drawstrings were on relatively few garments.

Several sweatshirts were reported to have "mock" drawstrings at the collar that look like drawstrings, but were not threaded through the garments. The strings were attached superficially to the collar of the garment, giving the appearance of a drawstring but when pulled, did not function as a drawstring. These items were not included in the percentage of garments containing drawstrings. Velcro, snaps, and elastic were some alternatives to drawstrings that were observed.

TAB C



United States
CONSUMER PRODUCT SAFETY COMMISSION
Washington, D.C. 20207

MEMORANDUM

DATE: SEP 28 1995

TO : Deborah K. Tinsworth, EHHA
Project Manager

Through: Andrew Stadnik, AED, Directorate for Engineering Sciences *AS*

FROM : Celestine M. Trainor, ^{crit} ESHF, 504-0468 ext. 1284

SUBJECT: Human Factors' Analysis of Drawstrings on Children's Garments

The purpose of the memo is to provide the Human Factors' analysis of the hazards associated with clothing strings at the neck and waist of children's outerwear garments.

Neck Strings

Any length of string at the neck of children's garments is a hazard because of the strangulation potential. Drawstrings close to the neck present a unique hazard because strangulation can occur if the string or garment apply pressure against the neck. Once a string is caught, it is possible for a jacket that is zippered or buttoned (partially or completely) to slip up and put pressure across the child's neck causing ligature strangulation.

Children are very active and explore their environment in a variety of ways. Climbing play is one way they are able to test and develop their skills. Through peer play, children play follow-the-leader and challenge each other to test their limits. For this reason, it is not possible to account for every way a child will play, much less every possible way strings on garments will get "caught" during play.

Simply shortening the drawstrings does not eliminate the hazard for several reasons. From a manufacturers' stand point, the wide variety of garment sizes makes it nearly impossible to consistently have drawstrings with only a few inches of exposed string. Also, once the string is pulled for tying, it becomes longer. While bartacking will prevent the string from all pulling to one side, it does not cause the string to retract to its original length when untied. From the parent's point of view, a shorter string is more likely to retract into the

channel. To avoid this inconvenience, tying a knot on the end prevents this from happening and also prevents the string from unraveling. From the child's standpoint, the drawstring is still accessible to potential entanglement hazards because of play behavior. For example, children go down slides on their belly, either head first or feet first. This puts the neck strings right against the slide platform and next to the handles -- the most widely reported location of entanglement.

Toggles and knots on the ends of strings play a major part in the entanglement issue. They act as weights on the strings and as catchpoints. Removing toggles and knots from the drawstrings is highly recommended, however, this does not completely eliminate the hazard. Providing safety instruction labels and hang tags to warn of the hazard also does not eliminate the hazard. Nor is it likely these measures will adequately warn or prepare consumers to address the hazard. Most consumers are familiar with jackets and other outer garments and therefore, are not likely to be looking for use instructions. Second, while a hang tag may be read at point of purchase, once the garment is in use, a hang tag will be discarded and the information will no longer be available. Consumers who have washed garments with tie strings, and had the strings "lost" inside the string channel are likely to tie knots on the ends of the strings to prevent this from happening again. Finally, labels and hang tags generally are no substitute for reasonable design changes in helping prevent a risk of injury or death.

Another component of the strangulation hazard associated with neck strings is unsupervised play. Typically, children playing in the back yard or with neighborhood friends are not under continuous adult supervision. When a string catches the child may be in a situation in which he/she is too far away from the entanglement point to free the string. The child could also be suspended in such a way that he/she cannot slip out of the garment. Without assistance, the child is helpless.

Children play in numerous ways; therefore, there are numerous ways in which drawstrings at the neck can become entangled. It is not possible to specify a "safe" length of drawstrings that can be used at the neck of children's outerwear garments.

In July 1994, CPSC issued a press release which recommended consumers remove the drawstrings completely or sew the string at the middle of the hood and then cut the string ends as short as needed to close the garment. This recommendation was made to provide consumers with a means of making garments currently in the home safer until new garments were available. Garments with alternative closures were generally not available to consumers at the time. Now that alternatives are more widely available, consumers are encouraged to use garments without hood/neck drawstrings.

Waist/Bottom Strings

The hazard associated with strings at the waist or bottom of children's outerwear garments is vehicular dragging. Waist strings on older children's garments caught on hand rails of school buses when children disembarked. Due to excessively long strings, children were off the bus and out of the driver's view before the entanglement was discovered.

Human Factors' staff judges shorter strings (i.e., three inches of exposed string) at the waist to be acceptable because there is less chance of the string catching. Also, adult supervision and assistance is available to correct the situation, if it does occur. For example, with shorter strings children will not be able to pull the string long enough to get off the bus. Therefore, the child is in the driver's view when the entanglement is discovered. Finally, if shorter strings catch, children are capable of correcting the situation or asking for help before an injury or death occurs. A waist string entanglement does not restrict the child's arm from fixing the situation.

Again, toggles and knots play a major part in this entanglement situation and therefore should not be allowed on the garment. Recognizing, as stated above, that consumers are likely to tie knots in the ends of the strings at least the shorter string will somewhat reduce the chances of entanglement.

Conclusions

Human Factors' staff judges that strings at the neck of children's outerwear garments are a strangulation hazard and that no "safe" length of string can be recommended.

Shortening the length of strings at the waist or bottom of garments will lessen the chance of entanglement. Not allowing toggles and knots will lessen the chances even more. While entanglement can still occur, as long as there are strings on the garments, shorter strings provide the opportunity to disengage the entanglement before an injury or death.

TAB D



United States

CONSUMER PRODUCT SAFETY COMMISSION

Washington, D.C. 20207

SEP 8 1995

MEMORANDUM

TO: Ron Medford, Assistant Executive Director
Office of Hazard Identification and Reduction

Through: Mary Ann Danello, Associate Executive Director *m. Danello*
Directorate for Epidemiology and Health Sciences

Robert Frye, Director *RF*
Division of Hazard Analysis

From: Kimberly Long, EHHA *K.L.*

Subject: Results of Retail Store Survey on Children's Outerwear with Drawstrings

Background

The CPSC Field staff was directed to survey retail outlets to examine the Fall 1995 ("Back to School") line of children's clothing to find out if manufacturers are still using drawstrings in the neck or hood area of children's outerwear jackets and sweatshirts. The investigators were asked to report whether the retail store contained hooded jackets and sweatshirts with drawstrings around the neck area in children sizes 2 to 12 for each store visited. The investigators indicated the amount of jackets and sweatshirts found in each store's stock, such as no garments, few garments, about half of the garments, most of the garments, or all of the garments. The survey was conducted between July 17 and August 14, 1995.

The three categories of stores used in this survey were discount/mass merchants, department stores, and children's specialty stores. Some examples of discount/mass merchants are Sears, Montgomery Wards, Walmart, and Kmart. Department stores vary throughout the U.S.; examples include JC Penny, Macy's, and Belk. Children's specialty stores include Kids 'R' Us, Gap Kids, and Gymboree. The sample was selected based on the proportion of the market share for these three categories. Each of the three CPSC regional offices and the Mid-Atlantic Service Center were given a specific number of discount/mass merchandisers, department stores, and children's specialty stores to visit. Field offices in the southern portion of the U.S. were excluded from this survey because these areas were thought to carry fewer outerwear jackets and sweatshirts at the time of the survey.

The CPSC Field staff visited 130 stores throughout the U.S.. Forty-three percent of the stores visited were discount/mass merchants, 29 percent of the stores were department stores, and 28 percent of the stores were children specialty stores. These stores were in 63 different cities and 19 different states, thus giving a representative sampling of the types of stores selling children's clothing in the U.S..

Results

Children's outerwear jackets were examined in sizes 2-6 and sizes 7-12 for both girls and boys. Sweatshirts were examined in sizes 2-6 and sizes 7-12 only. Table 1 shows the distribution of the stores not selling children's outerwear with drawstrings at the hood or neck area by sizes and types. Approximately 70 percent of the stores did not contain outerwear garments with drawstrings around the neck or hood area.

Table 1
Percentage of Stores Not Selling Garments with Drawstrings at the Hood or Neck Area
by Children's Outerwear Types and Sizes

Children's Outerwear by Type and Size	Percentage of Stores Not Selling Garments With Drawstrings
Girls' Jackets Sizes 2-6	71
Girls' Jackets Sizes 7-12	72
Boys' Jackets Sizes 2-6	65
Boys' Jackets Sizes 7-12	59
Sweatshirts Sizes 2-6	75
Sweatshirts Sizes 7-12	68

Source: U.S. Consumer Product Safety Commission / EHHA, July-August 1995.

The percentages listed in Tables 1A - 1F provide more detail by type and size of children's outerwear garments. The tables show the percentage of stores that contained no garments in the store with drawstrings (None), few garments in the store with drawstrings (Few), about half of the garments in the store with drawstrings (About Half), most of the garments in the store with drawstrings (Most), and all of the garments in the store containing drawstrings (All) by the type and size of children's garments.

Table 1-A
Girl's Jackets in Sizes 2 to 6

Amount of Garments in Store Containing Drawstrings	Percent
None	71
Few	17
About Half	6
Most	3
All	3
Total	100

Table 1-D
Girl's Jackets in Sizes 7 to 12

Amount of Garments in Store Containing Drawstrings	Percent
None	72
Few	16
About Half	5
Most	4
All	3
Total	100

Table 1-B
Boy's Jackets in Sizes 2 to 6

Amount of Garments in Store Containing Drawstrings	Percent
None	65
Few	20
About Half	8
Most	4
All	3
Total	100

Table 1-E
Boy's Jackets in Sizes 7 to 12

Amount of Garments in Store Containing Drawstrings	Percent
None	59
Few	25
About Half	6
Most	8
All	2
Total	100

Table 1-C
Sweatshirts in Sizes 2 to 6

Amount of Garments in Store Containing Drawstrings	Percent
None	75
Few	15
About Half	3
Most	3
All	4
Total	10

Table 1-F
Sweatshirts in Sizes 7 to 12

Amount of Garments in Store Containing Drawstrings	Percent
None	68
Few	16
About Half	6
Most	6
All	4
Total	100

Source: U.S. Consumer Product Safety Commission / EHHA, July - August 1995.

TAB E.



United States
CONSUMER PRODUCT SAFETY COMMISSION
Washington, D.C. 20207

MEMORANDUM

DATE: September 28, 1995

TO : Deborah Tinsworth
Project Manager on Children's Drawstrings
Directorate for Epidemiology

Through: David Schmeltzer, AEDC *C & P mg for DS*
Marc J. Schoem, Director, CCA *cc for*

FROM : Jean Kennedy *JK*
Compliance Officer
Division of Corrective Actions

SUBJECT: Chronology of Compliance Actions to Address Drawstring
Hazards on Children's Clothing.

In April 1994 Compliance staff contacted and met with manufacturers and retailers to report CPSC data of 12 deaths and 27 incidents involving children's clothing drawstrings. The drawstrings caught in unsuspected locations during children's everyday activities, namely cribs, slides, escalators, and fences. We informed the manufacturers and retailers that England had banned hoodstrings in 1976 after only three deaths. The staff requested that they voluntarily begin to eliminate drawstrings around the necks/hoods of children's garments during the following year to prevent incidents from this unsuspected hazard. The staff believed that these types of incidents would continue and they have, as we now know of a total of 17 deaths and 42 incidents.

Staff urged that industry voluntarily eliminate drawstrings on hoods/necks; that alternative means were readily available; that the cost would be about the same; and that a year to change designs was reasonable so as not to cause hardship to the industry. The manufacturers and retailers attending the meetings indicated that if they voluntarily changed their designs, they would want the same level playing field established for all manufacturers in the future.

Chairman Ann Brown held a press conference July 7, 1994 to announce the cooperative agreement of 28 manufacturers and four retailers to design children's jacket and sweatshirt hoods without drawstrings by Spring or Fall 1995. Since then, 33

manufacturers and four retailers have committed to publishing their names as using no drawstrings on hoods or necks of children's jackets and sweatshirts. Many other major and small retailers and manufacturers have joined the safety effort. They voluntarily changed designs and are selling jackets without drawstrings on hoods or necks. Several major retailers have requested that their suppliers incorporate designs on jackets that eliminate hoodstrings or neckstrings.

Manufacturers who have been in contact with staff indicated they have not received complaints from consumers, except from one who asked why the drawstrings were gone, but was satisfied when told of the hazard. One major sweatshirt manufacturer stated that the firm received hundreds of letters and postcards from parents not to put strings back on the sweatshirts/jackets. The consumers who work with farm machinery explained how dangerous strings are as they can easily be caught or pulled into farm machinery.

Additionally, some manufacturers have also informed staff that the cost of jackets with the alternative closures of elastic, snaps, or velcro was no different than with strings and toggles. Except for redesign costs, which manufacturers do most years anyway, some said costs may even be a little less.

Staff this year made an effort to inform manufacturers about the newer hazard with bottom drawstrings caught in vehicles. Many have already voluntarily shortened strings on the bottom or waist of jackets and eliminated toggles. They also bartacked the midpoint of the drawstring to prevent all the string length moving to one side, to catch in schoolbus doors, ski lifts, farm machinery, elevators, bicycles or other vehicles. CPSC contacted the National Highway Traffic Safety Administration (NHTSA) to share information verifying that 12 children in the last five years were dragged and hurt when bottom drawstrings caught in bus handrails, kickplate or door; four of those children died from being run over by the bus. Two deaths and two injuries from drawstrings caught in bus doors have occurred in 1995.

Compliance staff continues to answer industry calls about the data, the voluntary effort that addresses the hazards involved, and to conduct investigations of drawstring incidents.

TAB F



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207

AUG 22 1995

John A. Blair
DuPont Polymers
P.O. Box 80713
Wilmington, DE 19880-0713

Re: Drawstrings on Children's Clothing (ASTM F15.37)

Dear Mr. Blair:

This letter provides CPSC staff views on the August 1995 ASTM F15.37 ballot on drawstrings for children's clothing.

Since 1985, CPSC has received reports of 17 deaths and 40 non-fatal incidents resulting from drawstrings on children's clothing becoming caught on such products as playground slides and schoolbus handrails. We believe that these deaths and injuries are preventable, and urge you to consider our comments in the development of the ASTM safety standard.

Drawstrings on the Hood or Neck

The CPSC staff continues to oppose the use of drawstrings of any length at the neck area of children's upper outerwear. One year ago, 28 manufacturers and 4 retailers of children's garments agreed to remove strings from the hoods of children's clothing. The proposed ASTM standard, however, allows 4- and 5-inch string lengths for sizes 2T-4T and 4-12, respectively. The proposed standard is a retreat from the current level of product safety afforded by garments without strings. The enclosed article from the Wall Street Journal describes the impressive efforts of Mrs. Thelma Sibley in addressing clothing string hazards after the tragic death of her daughter. It illustrates the national attention this problem has received and is likely to receive in the future.

Several factors contribute to the CPSC staff position. The proposed ASTM requirements are based on the rationale that for most of the at-risk population, the drawstring, when hanging at centerline, would not extend horizontally beyond the shoulder and would therefore be less likely to drop in a potential catch point beside or behind a child. However, exposed portions of 4- and 5-inch drawstrings could become considerably longer when pulled through the drawstring channel (even when bartacked), and strings may not necessarily retract to their original length when untied. The risk of entanglement would also be influenced by

the location of the drawstring exit point, the degree to which the garment is zipped or buttoned, the activity of the child, and other factors that may be difficult to control. Staff is aware of an incident in which the 5-inch hood drawstring of a 5-year-old child became entangled on a playground slide.

In addition, the proposed safety instructions label and the hang tag are likely to have limited effectiveness for several reasons. First, neither state the hazard. While the hang tag does refer to "serious injury" it is not clear what type of injury. The permanent label, which will actually stay with the garment, completely fails to state the hazard. Second, the hang tag, which may be read at the time of purchase, will be discarded, thus making it useless to subsequent users of the garment. Third, the standard does not indicate where the label should be applied to the garment and requires the same minimum type sizes required for care instructions. This makes it possible for manufacturers to put care and "safety" instructions on one label, thus reducing the likelihood that consumers will see the message. Finally, labels generally are no substitute for reasonable design changes in helping prevent a risk of injury or death.

Thus, staff continues to recommend removal of all strings from the neck area of children's garments.

Bottom/Waist String Requirements

Staff is pleased with the inclusion of requirements to address vehicular dragging hazards associated with waist and bottom drawstrings of upper outerwear, in that national efforts to retrofit schoolbus handrails have not been completely effective in eliminating entanglement hazards.

Thank you for this opportunity to express our views. These recommendations are based on the suggestions of the CPSC staff, and do not necessarily reflect the official policy or position of the Consumer Product Safety Commission. If you have any questions, please feel free to contact Jean Kennedy at (301)504-0608, extension 1360, or me at (301)504-0470, extension 1276.

Sincerely,



Deborah Tinsworth
Project Manager,
Directorate for Epidemiology and Health Sciences

Enclosure

cc: ASTM F15.37 Subcommittee Members

THE WALL STREET JOURNAL.

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MONDAY, AUGUST 14, 1995

A Little Girl's Death Inspires Her Mother In a Safety Crusade

* * *

Nancy Sibley Was Strangled
By a Drawstring on a Coat;
Clothiers Switch Fasteners

By JON BIGNESS

Staff Reporter of THE WALL STREET JOURNAL
ANN ARBOR, Mich. — "How do you replace a hug?"

That was Thelma Sibley's response when people asked whether she was going to sue over the death of her five-year-old daughter, Nancy. On Jan. 4, 1994, the drawstring on Nancy's winter coat snagged in a narrow gap at the top of a spiral slide at her elementary-school playground. She was choked, went into a coma and died.

Lots of Americans would have sued the clothing maker or the playground-equipment manufacturer. Despite unsolicited calls from several personal-injury lawyers, Mrs. Sibley declined to go that route. Anger and grief would have turned some mothers in Mrs. Sibley's position into placard-waving activists, leading boycotts or demanding a government crackdown. But Mrs. Sibley, a devout Baptist, found her own firm way to make a difference.

Her persistent letter-writing campaign to 128 clothing manufacturers as well as to several government agencies, news organizations and prominent individuals — including Hillary Rodham Clinton and Tipper Gore — galvanized the Consumer Product Safety Commission and its chief, Ann Brown. The federal agency ultimately persuaded 32 clothing manufacturers to voluntarily remove drawstrings from children's clothes.



Thelma Sibley

A year and a half after Nancy's death, drawstring garments for youngsters have disappeared from many department-store racks and mail-order catalogs across the U.S. Twenty-eight manufacturers and four retailers — including Levi Strauss & Co., Oshkosh B'Gosh Inc., Nike Inc. and Lands' End — have promised to remove all drawstrings by fall, replacing them with Velcro, snaps, buttons or elastic.

Michael G. Donabauer, vice president of corporate marketing and planning for

Oshkosh B'Gosh, in Oshkosh, Wis., met Mrs. Sibley at a July 7, 1994, news conference in Washington, where the drawstring agreement was announced. "She's a remarkable woman," Mr. Donabauer says. "She did a good job of getting Ann Brown's attention. Without Mrs. Sib-

ley's active involvement, this probably wouldn't have happened. Many people in the apparel industry were not aware of the problem."

Now, Mrs. Sibley has set her sights on improving safety on America's playgrounds, where between 170,000 and 225,000 children are injured each year — and about 17 die. She recently sent a letter asking 10 major playground-equipment manufacturers to bolster safety standards and to meet with parents, pediatricians and teachers to talk safety. The response so far has disappointed her. Just one

Please Turn to Page A7, Column 5.



Nancy Sibley

Nancy Sibley's Accidental Death Puts Mother on a Safety Crusade

Continued From First Page

company — Kompan Inc., of Ringe, Denmark—said it would distribute her letter to its people. Three others said they already are doing all they can to address safety issues.

Will industry silence be the end of it? Probably not. Mrs. Sibley may not be into litigating, but she also doesn't give up. "I can't protect every kid in this world," says the 46-year-old Mrs. Sibley. "But if I can do one little thing to save another child's life, I'm going to do it."

Mrs. Sibley has recruited one powerful, like-minded ally: Mrs. Brown of the Consumer Product Safety Commission. In the fall, Mrs. Sibley will appear in a video on playground safety for the commission. The video will be sent to TV stations, schools and day-care centers, urging the adoption of playground safety guidelines.

For 18 years, Mrs. Sibley had been a career woman, managing the color and trim studio of American Motors Corp., then for Jeep and Dodge trucks at Chrysler Corp., which had bought out American Motors. Then, Thelma and Bob Sibley adopted Nancy as an infant on June 20, 1988.

At Home With Nancy

Once the baby arrived, Mrs. Sibley decided to stay home with Nancy and be a full-time mom. Mrs. Sibley recalls doing the housework with tiny Nancy in a baby pack on her back.

At the time of her death, Nancy was in kindergarten at Pittsfield Elementary School here. A lively child, "she was always going 100 miles per hour," Mrs. Sibley says. The child's big brown eyes lighted up whenever her dad took her to the school playground, something they had been doing together since she was three years old.

After Nancy died, the spiral slide at Pittsfield Elementary School playground was dismantled, and Mrs. Sibley got to smack it several times with a baseball bat. But with the help of a counselor, she decided to do something constructive, rather than just be angry. Deeply religious, she went back to teaching Sunday school. And she began her drawstring campaign. The Sibleys moved to a 10-acre farm to heal and escape. It is called Youf Farm, after Nancy's mispronunciation of

the word youth. Mrs. Sibley went back to work, at Johnson Controls, an automotive-seat maker.

She doesn't want to see regulation come down from "Big Brother," she says. She prefers a low-key, cooperative approach that gives manufacturers the freedom to police themselves.

Coming to Grips

Mrs. Brown of the product-safety commission says that once children's clothing makers heard what happened to Nancy Sibley and grasped the extent of the problem, "it wasn't difficult to accomplish. They understand there is always the threat of regulation. But it's better to get it done in four months rather than the four years it might take to go through the courts."

It might still take awhile to see results from Mrs. Sibley's most recent letter-writing campaign and the video she is making. Playgrounds can be hazardous obstacle courses for children. Most lack soft ground covering, such as wood chips, to soften youngsters' falls. Many have poorly maintained equipment, and some of it is too high off the ground. A nationwide survey of 443 playgrounds by the Consumer Federation of America and the U.S. Public Interest Research Group concluded that more than 90% of all playgrounds pose serious health and safety risks.

Eric Strickland, who owns Grounds for Play in Arlington, Texas, says, "You can't eliminate all injuries. I've heard it said that the only playground that's 100% safe is one with no kids on it." Children need to take on certain challenges, he says. Equipment manufacturers need to think about "risk management."

California and Texas are the only states that have translated federal voluntary playground guidelines into state law; Arkansas and Oklahoma are deliberating legislation. At a time when European governments have come up with some of the toughest safety standards in the world, there are no national safety standards in the U.S. for playground equipment.

Why does Mrs. Sibley push on?

"It's something I can do in memory of Nancy," she says.

TAB G

STATUTORY INSTRUMENTS

1976 No. 2

CONSUMER PROTECTION

The Children's Clothing (Hood Cords) Regulations 1976

Made - - - - - 2nd January 1976*Laid before Parliament* - - - 9th January 1976*Coming into operation in accordance with Regulation 1(2)* -

The Secretary of State, after consulting in accordance with the provisions of section 1(5) of the Consumer Protection Act 1961(a) with such persons and bodies of persons as appear to her to be requisite, in exercise of her powers under sections 1 and 2 of that Act and of all other powers enabling her in that behalf, hereby makes the following Regulations:—

1.—(1) These Regulations may be cited as the Children's Clothing (Hood Cords) Regulations 1976.

(2) These Regulations shall come into operation on 1st February 1976 in relation to goods sold, or in the possession of any person for the purpose of being sold, by the manufacturer or importer into Great Britain of those goods and, in any other case, shall come into operation on 1st July 1976.

2.—(1) In these Regulations—

"the Act" means the Consumer Protection Act 1961;

"outer garment" means a raincoat, overcoat, anorak or other garment suitable for use as outer wear;

"child's outer garment" means an outer garment having a measurement not exceeding 44 cm across the chest when the finished garment is laid out as flat as possible without distorting its natural two-dimensional shape and buttoned or otherwise fastened as it is designed to be in normal wear.

(2) Any reference in these Regulations to an enactment shall be construed as a reference to that enactment as amended or extended by or under any other enactment.

(3) The Interpretation Act 1889(b) applies for the interpretation of these Regulations as it applies for the interpretation of an Act of Parliament.

3. The hood of a child's outer garment shall not be designed to be secured by means of a cord drawn through the material.

4. As respects the requirements of these Regulations, subsections (1) and (2) of section 2 of the Act (which prohibits sales and possession for sale of goods and component parts not complying with regulations) shall apply in relation to goods and component parts manufactured before the imposition of these requirements notwithstanding anything in subsection (4) of that section (which exempts such goods and parts unless regulations otherwise provide).

(a) 1961 c. 40.

(b) 1889 c. 63.

5. Section 2(1) to (3) of the Act (other than subsection (3)(d) and (e)) (sale and possession for sale of goods and component parts not complying with regulations) shall, except as provided by the proviso to section 2(6), apply in relation to goods to which these Regulations apply as if references to selling or to a sale included references to letting under a hire-purchase agreement or on hire, and the reference to a sale under a credit-sale agreement were a reference to a letting under a hire-purchase agreement.

6. The Schedule to the Act (which relates to enforcement by local authorities) shall have effect in relation to goods to which these Regulations apply.

Alan Williams,
Minister of State,

Department of Prices and Consumer Protection.

2nd January 1976.

EXPLANATORY NOTE

(This Note is not part of the Regulations.)

These Regulations provide that the hood of a child's outer garment shall not be designed to be secured by means of a cord drawn through the material.

TAB H

Guidelines for Drawstrings on Children's Clothing¹

Introduction

The U.S. Consumer Product Safety Commission (CPSC) is issuing these guidelines to help prevent children from strangling or getting entangled in the neck and waist drawstrings of upper outerwear garments, such as jackets and sweatshirts. Drawstrings on children's clothing are a hidden hazard that can lead to tragedy when they catch on such items as playground equipment, buses, or cribs. From January 1985 through September 1995, CPSC received reports of 17 deaths and 42 non-fatal incidents involving the entanglement of children's clothing drawstrings.

These guidelines are intended to provide consumers with information to help them address hazards with garments now in their possession and make informed purchasing choices in the future. Manufacturers and retailers should also be aware of these hazards, and are encouraged to consider this information in the production and sale of children's garments.

CPSC's drawstring guidelines do not represent a standard or mandatory requirement set by the agency. And, while CPSC does not sanction them as the only method of minimizing drawstring injuries, CPSC believes that these guidelines will help prevent children from strangling by their clothing drawstrings.

Deaths and Injuries

Hood/Neck Drawstrings

Over two-thirds of the deaths and non-fatal incidents involved hood/neck drawstrings. The majority of these cases involved playground slides. Typically, as the child descended the slide, the toggle or knot on the drawstring got caught in a small space or gap at the top of the slide. Examples of catch points include a protruding bolt or a tiny space between the guardrail and the slide platform. As the child hung by the drawstring, suspended part way down the slide, the drawstring pulled the garment up taut to the neck, strangling the child. Victims of these cases ranged in age from 2 through 8 years old.

Waist/Bottom Drawstrings

Almost one-third of the deaths and non-fatal incidents involved drawstrings at the waist/bottom of children's garments. Most of these involved children whose waist or bottom strings of their jackets got caught on school bus handrails or in school bus doors. In most cases, the jacket waist string snagged a small space in the hand rail as the child descended the bus. Without the child or bus driver realizing that the drawstring was caught on the

¹ These guidelines are presented in draft form. While some refinements in language may occur as this document is revised for publication, the basic issues and recommendations should not change. Graphics and formatting will be provided by EXPA at a later date.

handrail, the bus doors closed and the bus drove away, dragging the child. Deaths have occurred when children were run over by the bus. Victims of these school bus cases ranged in age from 7 through 14 years old.

Guidelines for Hood/Neck Drawstrings

Recommendation

CPSC recommends that parents or caregivers completely remove the hood/neck strings from all children's outerwear, including jackets and sweatshirts, sized 2T to 12. CPSC technical staff has concluded that strings at the neck that are shortened still present a strangulation hazard. Therefore, CPSC recommends that consumers purchase children's outerwear that has alternative closures, such as snaps, buttons, velcro, and elastic. CPSC also recommends that manufacturers and retailers provide garments with these alternative closures, rather than drawstrings at the head/neck area.

Guidelines for Waist/Bottom Drawstrings

Recommendation

For garments sized 2T to 16, CPSC recommends to consumers, manufacturers, and retailers that the ends of waist/bottom drawstrings measure no more than 3 inches from where the strings extend out of the garment when it is expanded to its fullest width. Also, the string should be sewn to the garment at its midpoint so the string can not be pulled out through one side, making it long enough to catch on something. CPSC also recommends eliminating toggles or knots at the ends of all drawstrings. Shortening the length of drawstrings at the waist and bottom of children's outerwear reduces the risk that the strings will become entangled in objects such as school buses.



United States
CONSUMER PRODUCT SAFETY COMMISSION
Washington, D.C. 20207

RECEIVED-OFFICE
OF THE SECRETARY
OCT -6 1995

Tm-1

BALLOT VOTE SHEET

DATE: OCT -6 1995

TO : The Commission
Sadye E. Dunn, Secretary

FROM : Eric A. Rubel, General Counsel *AR*
Stephen Lemberg, Assistant General Counsel *AR*
Patricia M. Pollitzer, Attorney, OGC *PMP*

SUBJECT: Safety Guidelines for Drawstrings on Children's Clothing

Ballot Vote Due OCT 17 1995

Attached is a briefing package in which the staff recommends that the Commission issue safety guidelines for drawstrings on children's clothing. The staff provides draft guidelines at Tab H of the package. The staff may make changes to the layout and precise wording of the draft guidelines. The staff will obtain Commissioners' approval of final guidelines.

Please indicate your vote on the following options.

I. Approve issuing safety guidelines for drawstrings on children's clothing.

[Signature]
Signature

10-12-95
Date

II. Approve issuing safety guidelines for drawstrings on children's clothing, with the following changes (please specify):

Signature

Date

NOTE: This document has not been reviewed or accepted by the Commission.

Page 1 of 2

Initial rh Date 10/6/95

CPSA 6 (b)(1) Cleared

☒ No Firms/Privileged or Products Identified

Excepted by _____

Firms Notified _____

III. Do not approve issuing safety guidelines for drawstrings on children's clothing.

Signature

Date

IV. Take other action (please specify): _____

Signature

Date

Attachments



United States
CONSUMER PRODUCT SAFETY COMMISSION
Washington, D.C. 20207

BALLOT VOTE SHEET

DATE: OCT -6 1995

TO : The Commission
Sadye E. Dunn, Secretary

FROM : Eric A. Rubel, General Counsel *ER*
Stephen Lemberg, Assistant General Counsel *SL*
Patricia M. Pollitzer, Attorney, OGC *PM*

SUBJECT: Safety Guidelines for Drawstrings on Children's Clothing

Ballot Vote Due _____

Attached is a briefing package in which the staff recommends that the Commission issue safety guidelines for drawstrings on children's clothing. The staff provides draft guidelines at Tab H of the package. The staff may make changes to the layout and precise wording of the draft guidelines. The staff will obtain Commissioners' approval of final guidelines.

Please indicate your vote on the following options.

I. Approve issuing safety guidelines for drawstrings on children's clothing.

Ann Brown
Signature

OCT 13, 1995
Date

II. Approve issuing safety guidelines for drawstrings on children's clothing, with the following changes (please specify): _____

Signature

Date

NOTE: This document has not been
reviewed or accepted by the Commission.

Page 1 of 2

Initial *rh* Date *10/6/95*

CPSA 6 (b)(1) Cleared
☒ No Firms/Privileged or
Products Identified

Excepted by

Firms Notified.

III. Do not approve issuing safety guidelines for drawstrings on children's clothing.

Signature

Date

IV. Take other action (please specify): _____

Signature

Date

Attachments



United States
CONSUMER PRODUCT SAFETY COMMISSION
Washington, D.C. 20207

Signed
RECEIVED-OFFICE
OF THE SECRETARY
'95 OCT -6 P4:15

MSG-1

BALLOT VOTE SHEET

DATE: OCT -6 1995

TO : The Commission
Sadye E. Dunn, Secretary

FROM : Eric A. Rubel, General Counsel *AR*
Stephen Lemberg, Assistant General Counsel *AR*
Patricia M. Pollitzer, Attorney, OGC *FMP*

SUBJECT: Safety Guidelines for Drawstrings on Children's Clothing

Ballot Vote Due OCT 17 1995

Attached is a briefing package in which the staff recommends that the Commission issue safety guidelines for drawstrings on children's clothing. The staff provides draft guidelines at Tab H of the package. The staff may make changes to the layout and precise wording of the draft guidelines. The staff will obtain Commissioners' approval of final guidelines.

Please indicate your vote on the following options.

I. Approve issuing safety guidelines for drawstrings on children's clothing.

Darryl Galt
Signature

10/12/95
Date

II. Approve issuing safety guidelines for drawstrings on children's clothing, with the following changes (please specify): _____

Signature

Date

NOTE: This document has not been reviewed or accepted by the Commission.

Page 1 of 2

Initial rh Date 10/6/95

CPSA 6 (b)(1) Cleared
10/6/95
No Firms/Private Labels or
Products Identified
Excepted by _____
Firms Notified. _____

III. Do not approve issuing safety guidelines for drawstrings on children's clothing.

Signature

Date

IV. Take other action (please specify): _____

Signature

Date

Attachments