

Safety of Children's Clothing Project

Background

The purpose of the project was to identify potential safety hazards with children's clothing on the market today. UK Accident statistics for 2000 to 2002 show a 65% increase in accidents involving children's clothing. This is likely to have increased as discount retailing in the UK has taken on a higher profile over recent years selling clothing at low prices which may be inferior quality compared to some of the premium brands.

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- **Entrapment of hood or neck cords** in playground equipment resulting in strangulation.
- **Entrapment of cords & strings from the waist** and lower edges of the garment being caught in moving vehicles such as bus doors and bicycles, resulting in severe injury or death from being dragged or run over by a vehicle.
- Young children often swallow buttons and other **decorative foreign bodies**, inhale them or push them into body cavities such as the nose and ear.

Legislation and Standards

The General Product Safety Regulations 2005 cover ALL products.

The Children's Clothing (Hood Cords) Regulations 1976
BS 7907:1997 – Code of practice for the design and manufacture of children's clothing to promote mechanical safety.

BSEN 14682:2004 – Cords & Drawstrings.

Method

Samples of children's clothing were purchased from a variety of retail outlets. Types of clothing targeted were those aimed at very young children with attachments such as decorative buttons, cords and trimmings that could be detached and present a choking hazard and clothing that may present entrapment /strangulation hazards for older children such as draw strings, cords and sashes.

The procured clothing samples were then sent for general and compliance testing.

Results from the laboratory

The majority of the clothing samples purchased were from retail outlets that specialise clothing in the lower end of the market which tends to be characterised by own brand discount clothing.

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Eight out of ten of the clothing samples failed to comply with relevant safety tests carried out in accordance with the safety standards. Five of these items failed to comply with the harmonized British Standard BS EN 14682:2004 Safety of children's clothing-cords and drawstrings on children's clothing specifications. The reason for failure was the drawstrings and clothing cords attached to the garments exceeded the maximum length specified in the standard which may pose entrapment hazards to the wearer.

Four of the samples failed to comply with the standard BS7907:1997 Code of practice for the design and manufacture of children's clothing to promote mechanical safety. One item of clothing consisted of a waist sash decorated with sequins. The sequins could easily be detached from the garment with a force of 50 Newtons and when detached may pose a choking hazard.

The second item consisted of infants trousers with a decorative cord with free ends. The cord had a plastic toggle attached to it which could be easily removed and was found to fit entirely within the small parts cylinder and therefore presented a potential choking hazard.

The third item consisted of a girls black top with buttons and decorative sequins. The sequins and buttons were detached at a force of less than 70 Newtons and when detached may present a potential choking hazard.

The final item of clothing consisted of a girls red dress with buttons and sequins at the front which became detached at a force of less than 70 Newtons. This item also had a decorative cord around the waist area which failed to comply with harmonized British Standard BS EN 14682:2004 Safety of children's clothing-cords and drawstrings on children's clothing specifications.

All four clothing samples were therefore considered unsafe products and in contravention of the General Product Safety Regulations 2005.

The remaining clothing samples failed to comply with the relevant safety tests carried out in accordance with the safety standard BS EN 14682:2004, safety of children's

clothing-cords and drawstrings on children's clothing specifications. The first item consisted of a pair of boys swimming shorts intended for a child of 4-5 years of age. The shorts had a functional drawstring around the waist which was not secured in the shorts and exceeded the length specified by the standards which may present a potential entrapment hazard.

The other samples consisted of skirts or dresses with tie sashes around the waist area that when untied hung below the hem of the garments which contravened the standards and as such may pose potential entrapment hazards. Again four clothing samples were therefore considered unsafe products and in contravention of the General Product Safety Regulations 2005.

Conclusion

In determining what action was to be taken in relation to the failed clothes samples a risk based approach was implemented taking into account the type of hazard, the level of risk and the vulnerability of the consumer exposed to the risk. Children under 3 years of age are classed as very vulnerable and the risk of choking is considered a serious hazard. The clothing that presented potential choking hazards, the trousers with plastic toggle for infants 9-12mths, the girls trousers with the sequinned sash for 18-24mths and the girls black sequinned top for 2-3 yrs were therefore all considered to be serious risk items and as such action needed to be taken to mitigate the continuing risk to which purchasers of the product were exposed to.

In response to notification from the Trading Standards Service of the potentially unsafe item of clothing one retailer instigated a public product recall of the trousers which was published in their stores and on their website. A RAPEX notification was then submitted to the DTI to inform Member States and the Commission of measures taken to prevent or restrict the marketing or use of products posing a serious risk to the health and safety of consumers.

A second retailer removed all the remaining stock from the shop floors and has updated their risk assessment of children's clothing.

The items of clothing that contravened the standard BS EN 14682:2004, safety of children's clothing-cords and drawstrings on children's clothing specifications although were considered to present a risk it is not one that required immediate intervention.

A third retailer confirmed that the company has taken precautionary action by removing all the sashes of the dresses remaining in their stores and ensuring product lines are risk assessed in future. A fourth have removed all the remaining boys swimming trunks in stores and will adjust next years stock to satisfy safety standards. A fifth, who make their own clothes have also made adjustments to the ties on the dresses to ensure the length of the tie conforms with safety standards.

Summary

Out of ten samples eight failed the safety tests applied and were therefore considered to be unsafe products contravening the General Product Safety Regulations 2005.

Four of the eight items of clothing failed due to the serious risk of a choking hazard.

One being a pair of trousers for a child aged 9-12mths with a decorative drawstring around the waist with a plastic toggle. The drawstring had free ends enabling the plastic toggle to be easily removed which may present a serious choking hazard.

The Trading Standards Service immediately notified the retailers of the test results and advised that they took action to mitigate the continuing risks to which purchasers of the product are exposed to. The company responded by instigating a public product recall of the item in all of their stores and on their website.

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Two further samples purchased from also failed safety assessments. One being a black sequinned top for a child aged 2-3 years old. The sequins measuring 10 and 13 mms in diameter detached with a force of less than 34 Newtons and therefore could easily become a serious choking hazard. The second item of clothing was a dress with buttons and a decorative cord around the waist. This item failed due to the buttons detaching and posing a choking hazard and the decorative cord being design as such it may present an entrapment hazard.

The second item was a pair of girls trousers with a sequinned tie sash around the waist which failed due to the sequins detaching and presenting a potential choking hazard. As a result the retailer has removed all remaining items from their stores and updated their risk assessment for children's clothing.

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The remaining five samples of clothing failed due to the risk of entrapment of long ties, sashes and cords in bikes or moving vehicle etc. The companies were informed of the results and have each taken action to mitigate the risk to which purchasers of the product are exposed to including having the item adjusted to conform with current safety standards or removing the items from the shelves and ensuring future product lines conform with safety requirements.