Softlines Regulatory Handbook 2023

Your guide to the latest regulatory requirements for apparel, accessories and footwear

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01 Introduction

TÜV SÜD presents the 2023 edition of the “Softlines Regulatory Handbook” for apparel, accessories, home textiles and footwear industries. At TÜV SÜD, we are constantly researching for up-to-date regulatory information related to consumer products, in order to support our clients’ success in different markets. This handbook therefore consolidates the latest regulatory requirements related to Softlines products for different markets across the world. It also serves as a reference guideline for entire supply chains for softlines industries including manufacturers, suppliers, retailers and brands, enabling them to get a comprehensive understanding of product safety requirements globally.

This handbook contains information about the regulatory landscape of different countries, the driving force for the enforcement of new requirements such as activities of non-governmental organisations (NGOs), hazardous substances including their applications, as well as the hazards about which textile and footwear brands and retailers should be aware of. This handbook also summarises regulatory requirements related to textile and leather products for different countries across the world such as US (CPSIA), EU (REACH), Canada (CCPSA), China (GB), etc.

To understand the areas of concern, recent recall cases for different markets are also included. Apart from chemical requirements, other safety requirements such as flammability and mechanical safety are one of the concerns for softlines products. Flammability regulation for textile products differs from country to country, and understanding flammability requirements for a single product sold in different countries can be a complicated process. This handbook therefore includes a quick and comprehensive guideline on flammability requirements for textile products in various countries. Moreover, it has been observed that most of the garments are being recalled due to risk of injury or strangulation hazards associated with drawstrings or cords. With regards to addressing this particular hazard, we provide a comprehensive guideline for drawstring regulations for different countries.

This “Softlines Regulatory Handbook” is a user-friendly guide for manufacturers, brands and retailers to:

- Acquire technical knowledge
- Minimise business risks
- Reduce costs
- Overview of worldwide safety and legal standards
- Achieve high quality in material safety
- Maintain and build a positive brand reputation

TÜV SÜD recognises the dynamic and evolving nature of product safety regulations. As businesses face new challenges with various technical problems every day, product safety regulations need to be updated frequently. To keep you abreast of the latest changes, TÜV SÜD regularly publishes technical updates and market news to better prepare you for upcoming challenges. These updates are published in our Consumer Products & Retail E-ssentials and can be accessed **here**.

Consumer product safety and the global marketplace

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02 Consumer product safety and the global marketplace

Today's consumers are increasingly aware of how products may impact their health and the environment. To ensure that product safety is properly addressed, government authorities of different countries are formulating and enforcing regulations and restrictions on the sale of consumer products.

Moreover, in recent times, many campaigns are being run by non-government organisations (NGOs) to secure product safety against hazardous chemicals. Several leading international brands are committed to the public for zero-discharge of hazardous substances and they have already started implementing action plans in their manufacturing processes and supply chains.

In light of recent sweeping changes in the world's economy and the heightened attention of consumer's awareness on sustainable production, the textile and footwear supply chains are now facing an increasing number of different challenges. Challenges include product safety, quality, functionality and value for money as well as environmentally and socially sustainable production of textile and footwear products. The ways in which production facilities manage the environment as well as their workers' occupational health and safety are getting increasing attention. As a result of these stakeholder's demands, brands, retailers and their supply chains are now required to become more transparent, secure and efficient.

In order to adapt to evolving market conditions, manufacturers of consumer products, such as textiles, footwear, accessories, are continuously putting in efforts to find new ways to create more environmentally friendly products. Manufacturers are searching for ways to eliminate hazardous substances in consumer products by using more environment friendly chemicals in the manufacturing process and to offer more sustainable formulated products, as well as to reduce the carbon footprint.

As international trade is increasing significantly, the same products are being sold in the markets across the world. In such situations, complying with the regulatory requirements of different countries is becoming a major challenge for the manufacturer and retailer. It is important to observe various regulatory landscapes in order to prepare for compliance.

How can TÜV SÜD help?

TÜV SÜD enables manufacturers, retailers and brands to decipher the varying international regulations on hazardous substances, safety and labelling requirements. We enable you to tailor your use of such materials, so as to meet regulatory standards such as CPSIA, GB, REACH, California Proposition 65, etc. Our experts provide knowledge on issues you may face in aligning your use of hazardous substances to the Restricted Substance List, quality requirements and safety. We have the necessary laboratory facilities to offer testing solutions that determine your product's RSL and safety compliance. In addition, we keep you updated on upcoming changes in regulations and how your products will be affected by these changes.

TÜV SÜD's services for softlines products include:

- **Testing** – TÜV SÜD testing laboratories are accredited in accordance to ISO/IEC 17025 and also by regulatory bodies such as Consumer Product Safety Commission (CPSC).
- **Documentation** – We can review the content of your documentation and provide advice on any changes necessary to ensure compliance.
- **Regulations** – TÜV SÜD's technical experts keep up-to-date on applicable regulations, and participate in a number of key industry groups and trade organisations.
- **Other requirements** – We offer support for compliance with CPSIA-required testing in conjunction with other international regulations and standards.

Overview of major regulatory bodies and their roles

(in North America and EU)

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Keep consumers safe, keep markets growing

Products are increasingly put under the regulatory spotlight and evaluated based on criteria ranging from health and safety, to environmental and social sustainability. As manufacturers go global, they will increasingly have to think local; ensuring their products and processes comply with diverse regulatory landscapes.

03 Overview of major regulatory bodies and their roles (in North America and EU)

3.1 USA

1. **Consumer Product Safety Commission (CPSC)**
   http://www.cpsc.gov

The **U.S. Consumer Product Safety Commission** (CPSC) is an independent federal regulatory agency. The commission was first created to protect the safety of the American citizenry from unreasonable risks of injury or even death as a result of contact with or use of more than 15,000 types of consumer products. To this day, several decades later, the CPSC remains tasked with the responsibility of protecting the American public from unreasonable injury or death risks due to hazards associated with consumer products.

There are thousands of types of consumer products that are considered to fall under the jurisdiction and control of the CPSC. More specifically, the commission is focused on protecting consumers, individuals, and families from consumer products that threaten fire, electrical, chemical, mechanical, or other types of hazards. The CPSC is also dedicated to protecting the American public from consumer products that have the capacity or potential to injure children.

Over the last three decades, the commission's work in ensuring the safety of consumer products has contributed substantially to the 30 percent decline in death and injury rates associated with the use of consumer products. The CPSC takes seriously its mission to inform and protect the public from various consumer product hazards and risks.

One of the ways the commission meets with marked success and overall safety compliance improvement from manufacturers and retailers is the use of civil penalties against offending parties or entities. The CPSC also has more passive ways of accomplishing this same aim through the use of marketing, communication, and public education and advisory coverage afforded through both the local and national media in press releases, consumer product alerts, publication of booklets and pamphlets, telephone hotlines, website updates and information, and recall warnings in online, print, and other media.

CPSC Reform: The Consumer Product Safety Improvement Act of 2008 (CPSIA)

In August 2008, CPSC's responsibilities and abilities were enhanced considerably by the passage of the Consumer Product Safety Improvement Act of 2008 (CPSIA). The Act dramatically changed the testing and certification landscape for consumer products manufacturers, importers, and private labellers, as well as for CPSC.

The Act provided significant reforms of CPSC, including requiring CPSC to increase the number of its full-time personnel and assign employees to duty stations at US ports of entry or to inspect overseas manufacturing facilities, giving CPSC expanded authority to order recalls and notify the public of those recalls, and increasing the maximum civil and criminal penalties possible for non-compliance with CPSC's regulations.

The Act also expanded CPSC's ability to ensure children's product safety by amending several existing CPSC regulations, establishing new restrictions on hazardous substances in children's products, implementing a mandatory certificate for all types of children's products, and mandating third-party testing and documentation from an accredited laboratory.

2. **Federal Trade Commission (FTC)**
   http://www.ftc.gov

The Federal Trade Commission (FTC) is charged with ensuring consumer protection: stopping fraudulent, unfair,

03 Overview of major regulatory bodies and their roles (in North America and EU)

3.1 USA

or deceptive marketing and advertising practices, and enforcing consumer protection laws, rules, and guidelines.

The FTC has established regulations requiring that consumer commodities – other than cosmetics, drugs, food and therapeutic devices – be labelled to disclose identity of the commodity, the name and place of business of the product's manufacturer, packer, or distributor and net contents.

The agency has also established several regulations for specific products, including special labelling requirements for wearing apparel and textile products, as well as products made from particular materials such as fur and faux fur, leather and imitation leather, and wool.

3. **Customs and Border Protection (CBP)**
   http://www.cbp.gov

Customs and Border Protection (CBP) is a division of the US Department of Homeland Security. The division was formed in March of 2003, with the merger of the former Customs Service, Immigration and Naturalization Service, Border Patrol, and the Animal and Plant Health Inspection Service.

The agency works to ensure that the US is safe from acts of terrorism. In addition, CBP enforces US trade laws intended to protect the economy and the health and safety of the American people. CBP assures that goods arriving in the USA are legitimate and that appropriate duties and fees are paid. To accomplish this, the agency works closely with the trade community, other federal agencies, and foreign governments.

In particular, CBP works to ensure that consumer products entering the US have been properly marked with the correct country of origin and any other applicable product-specific marking requirements.

CBP and CPSC also works jointly to identify and examine imported shipments of consumer products at the port to stop dangerous and violative products from reaching consumer's hands.

4. **Environmental Protection Agency (EPA)**
   https://www.epa.gov/

The US EPA is an independent executive federal agency. Its mission is to protect human health and the environment.

The agency conducts environmental assessment, research, and education. It has the responsibility of maintaining and enforcing national standards under a variety of environmental laws, in consultation with state, tribal, and local governments. EPA enforcement powers include fines, sanctions, and other measures.

In particular, the Toxic Substances Control Act of 1976 (TSCA) is under EPA jurisdiction. EPA has the authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures.

03 Overview of major regulatory bodies and their roles (in North America and EU)

3.2 Canada

1. **Health Canada**
   http://www.hc-sc.gc.ca/index-eng.php

Health Canada is the federal department responsible for helping Canadians maintain and improve their health, while respecting individual choices and circumstances.

The Compliance and Enforcement Directorate supports Health Canada's mission to help Canadians maintain and improve their health by enforcing the laws and regulations related to the production, distribution, importation, sale and/or use of consumer products, tobacco, pest control products, drugs, biologics, medical devices and natural health products.

The Consumer Product Safety Directorate (CPSD) of the Healthy Environments and Consumer Safety Branch of Health Canada helps to protect the Canadian public by researching, assessing and collaborating in the management of health risks and safety hazards associated with consumer products that Canadians use every day. CPSD works in partnership with the industry (manufacturers, retailers and distributors) to ensure safer consumer products in the marketplace, and equip consumers with safety information that helps them make better decisions regarding the products they use.

CPSD conducts a wide range of activities to anticipate, mitigate and assist in reducing the health and safety risks associated with consumer products including consumer and workplace chemicals. CPSD's work includes:

- Conducting surveillance;
- Carrying out hazard and risk identification;
- Performing risk assessment and management;
- Carrying out investigations, inspections, seizures and prosecutions;
- Supporting to develop safety standards and guidelines;
- Testing and research on consumer products;
- Providing importers, manufacturers and distributors with hazard and technical information;
- Promoting safe and responsible use of products to consumers; and
- Publishing product advisories, warnings and recalls.

In 2011, Health Canada adopted the new Canada Consumer Product Safety Act (CCPSA) with modern tools and techniques that strengthen the safety of consumer products.

The CCPSA reflects years of extensive consultations with a broad range of stakeholders, including industry representatives, consumer groups, children's organisations, standards development organisations, other levels of government and the general public.

The law applies to a wide variety of consumer products including children's toys, household products and sporting goods.

2. **Competition Bureau**
   http://www.competitionbureau.gc.ca

The Competition Bureau is an independent law enforcement agency headed by the Commissioner of Competition. The Competition Bureau is responsible for the administration and enforcement of the various acts such as

- *Competition Act,*
- *Consumer Packaging and Labelling Act,*
- *TTextile Labelling Act* and
- *Precious Metals Marking Act.*

The basic operating assumption of the Competition Bureau is that competition is good for both business and consumers.

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3.3 European Union

1. **European Commission, Council and Parliament**
   Official website of European Union
   http://europa.eu/index_en.htm

The **European Commission (EC)** is the executive body of the European Union (EU). It consists of a team of 27 Commissioners. Each represents one EU Member State. The EC is responsible for proposing legislation, implementing European policies, setting up work plans and objectives for actions, managing budgets, as well as maintaining day-to-day running of the EU. The EC also represents the EU outside Europe to carry out activities such as trade agreements.

The **European Council** is the institution of the European Union (EU) that comprises the heads of Member States or governments of the Member States, along with the council's own president and the president of the Commission. The European Council has no formal legislative power and it is a strategic body that provides the union with general political directions and priorities.

The **European Parliament** is the directly elected parliamentary institution of the European Union (EU). Together with the Council of the European Union (the Council) and the European Commission, it exercises the legislative function of the EU. The European Parliament has legislative power.

Here are some examples for EU legislation,

Regulation: A "Regulation" is a binding legislation act for all EU Member States and it is directly applicable to the entire EU. For example, REACH and POPs are "Regulations" that applies to the EU Member States.

Directive: Directives bind Members States to certain goals which they must achieve, but the Member States must set up their own laws and it is up to individual Member States to decide on the details.

Decision: A Decision is an instrument which is focused at a particular person or group or countries and is directly applicable. Institutions may also issue recommendations and opinions which are merely non-binding declarations.

2. **The European Chemicals Agency (ECHA):**
   http://echa.europa.eu

The **European Chemicals Agency (ECHA)** is an agency of the European Union. It helps manage various chemical legislations, including the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), Classification, Labelling and Packaging (CLP), Biocidal Product Regulation, etc. The ECHA is the driving force among regulatory authorities in implementing the EU's groundbreaking chemicals legislation for the benefit of human health and the environment, as well as for innovation and competitiveness. It helps companies to comply with legislation, advances the safe use of chemicals, provides information on chemicals and addresses chemicals of concern.

Hazardous substances, their sources and hazards

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05 Hazardous substances, their sources and hazards

Manufacturing consumer products such as textiles, footwear, electrical goods and toys is a complicated process involving a wide range of chemicals and materials. It is important for manufacturers and retailers to remain compliant with the various prohibitions, limitations and other provisions of governments and industry associations. As different regions have their own laws and regulations affecting each product, ensuring compliance can be a challenge. In addition, many new prohibitions and changes to existing prohibitions are expected in the future, such as changes in standards and continuous updates in legislation such as REACH. Manufacturers and retailers need to quickly establish the applicability of these prohibitions to their products in order to meet legal requirements.

Many governments, industry associations and buyers create Restricted Substances Lists (RSL) in response to increasing public concern about product safety and environmental protection. These lists restrict the use or existence of certain carcinogenic, mutagenic, reproductive toxic, endocrine disruptive and persistent chemicals and substances in finished textiles, apparel, footwear products, toys, electrical goods as well as hardlines items.

TÜV SÜD provides testing services according to relevant international standards to determine the content of hazardous substances in materials. The following comprehensive list of restricted substances provides a general introduction to hazardous substances which can commonly be found in the supply chain.

1	Allergenic Disperse Dyes
2	Azo Dyes
3	Carcinogenic Dyes
4	Carcinogenic, Mutagenic and toxic to reproduction (CMR) substances
5	Chlorinated Organic Carriers (COC)
6	Chlorinated phenols
7	Diisocyanate
8	Dimethylfumarate (DMFu)
9	Flame Retardants
10	Formaldehyde
11	Heavy Metals
12	N-Nitrosamines
13	Nonylphenol and Nonylphenol Ethoxylates (NPs/NPEOs)
14	Organic Solvents
15	Organotin Compounds
16	Perfluoroalkyl and polyfluoroalkyl substances (PFAS)
17	Pesticides
18	Phthalates
19	Polycyclic Aromatic Hydrocarbons (PAHs)
20	Short Chain Chlorinated Paraffins (SCCPs)
21	Volatile Organic Compounds (VOCs)

05 Hazardous substances, their sources and hazards

5.1 Allergenic Disperse Dyes

Chemically a disperse dye molecule is based on an azobenzene or anthraquinone molecule with nitro, amine, hydroxyl, etc. groups attached to it. Disperse dyes have very good fastness to light.

Sources:
Disperse dyes are organic dyes, generally water-insoluble, and are suitable for dyeing textile fibres such as polyester, nylon, acrylic and cellulose acetate.

Hazards:
More than twenty disperse dyes have been identified as having allergenous (sensitising) potential to human skin and can be considered as a possible threat to health, especially if they exhibit poor perspiration fastness.

5.2 Azo Dyes

Azo dyes are substances which contain Azo bond (-N=N-) within the molecule.

Sources:
Azo dyes are a large class of very effective synthetic dyes used for colouring a variety of materials such as textiles, leather and apparel. A small proportion of azo dyes contains or can break down to form a class of chemical substances referred to as aromatic amines. Some of them are carcinogens. These azo dyes are therefore restricted.

Hazards:
These aromatic amines can migrate from clothing and leather articles dyed with particular azo dyes. Aromatic amines may be absorbed through the skin from dyed clothing and articles where there is direct and prolonged contact. The amount of aromatic amines released from dyed articles can increase with body heat, sweat or saliva. Those are carcinogenic and hazardous to human health.

5.3 Carcinogenic Dyes

There are thousands of textile dyes in various chemical classes in use and their carcinogenicity is often discussed.

Sources:
They can be found in dyed textiles.

Hazards:
Around 9 carcinogenic disperse dyes are identified which can lead to tumours or cause cancer when they are absorbed by the body beyond a certain limit.

5.4 Carcinogenic, Mutagenic and toxic to reproduction (CMR) substances

Chemical substances can be classified based on their toxicity to human health and the environment. Carcinogenic substances can cause or promote cancers. Mutagenic substances can cause genetic mutations while reprotoxic substances can have adverse impacts on sexual function or fertility for human, as well as developmental toxicity in the offspring.

Sources:
Certain CMR substances are present in clothing and related accessories, other textile articles and footwear, either as impurities from the production process or because they have been added intentionally for specific properties. e.g. 1-methyl-2-pyrrolidone (NMP), N,N-dimethylacetamide.

Global requirements on hazardous substances

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06 Global requirements on hazardous substances

The use of chemicals is regulated during production process around the world. Some legislations restrict the utilisation of chemicals and some are only applicable on the finished products. In addition to the legal requirements, NGOs and enforcement authorities are also concerned about chemicals that are potentially of high risk to human health and the environment. Consumers are increasingly more aware of the importance of product safety, and this gives a strong driving force for brands to control the use of chemicals during the manufacturing process.

This chapter provides an overview of various regulated chemicals based on legal requirements for softlines products e.g. EU REACH, EU POPs, CPSIA, CA Prop.65, China GB 18401, Japanese Law 112, CCPSA and Taiwan CNS 15290. The following information are summarised to the best of our knowledge, and can serve as an easy reference for manufacturers, suppliers, buyers and brand owners.

To observe the restricted substances requirements for different countries, it is necessary to pay special attention to the Member States of the European Union (EU). The restricted substances requirements of the European Union are applicable for all Member States. To have a complete picture of restricted substances for a European country, it is necessary to observe the European Union requirements as well as the national deviation of individual countries.

Twenty-seven Member States of European Union:

Austria	Estonia	Italy	Portugal
Belgium	Finland	Latvia	Romania
Bulgaria	France	Lithuania	Slovakia
Croatia	Germany	Luxembourg	Slovenia
Cyprus	Greece	Malta	Spain
Czech Republic	Hungary	Netherlands	Sweden
Denmark	Ireland	Poland	

06 Global requirements on hazardous substances

6.1 Test parameters & requirements (by country / region)

In this chapter, the restricted substances applicable to the fashion industry are summarised by countries / regions. It includes the legal requirements as well as the recommended requirements. This table is specific to textiles, footwear and accessories, for example fashion jewellery. It aims to give an overview of the various chemical requirements all over world.

Country / region	Test parameters	Regulations/reference	Requirements (permissible upper limit)	Relevant test methods
Australia	Azo dyes	• Voluntary	• Textiles and Leather: 30 mg/kg (sum)	• Textiles: ISO 14362-1, ISO 14362-3 • Leather: ISO 17234-1, ISO 17234-2
	Dimethylfumarate	• Voluntary	• 0.1 mg/kg	• ISO 16186, or EN 17130
	Formaldehyde	• Voluntary	• Clothing specifically marketed as suitable for people with sensitive skin: and infants' clothing (<24 months): 30 mg/kg; • Clothing and textiles in direct contact with skin: 100 mg/kg, • Clothing and textiles without direct contact with skin: 300 mg/kg	• ISO 14184-1, ISO 14184-3
	Phthalates	• Consumer Protection Notice No. 11 of 2011	• Toys and child care articles: DEHP: 1.0% by weight	• ISO 14389
	PFAS compounds – Perfluorooctanesulfonic acid (PFOS), including any of its branched isomers, its salts, perfluorooctanesulfonyl fluoride, and any substance containing a linear or branched perfluorooctanesulfonyl moiety and capable of degrading to PFOS (linear or branched)	• Industrial Chemicals Environmental Management (Registry) Instrument 2022 and its amendment, schedule 7	• PFOS and its salts: 0.025 mg/kg; • PFOS-related compounds: 1 mg/kg (each or sum) Effective 1 July 2025	• prEN 17681-1 (textiles) or ISO 23702-1 (leather)

06 Global requirements on hazardous substances

6.1 Test parameters & requirements (by country / region)

Country / region	Test parameters	Regulations/reference	Requirements (permissible upper limit)	Relevant test methods
Australia	PFAS compounds - Perfluorooctanoic acid (PFOA), including any of its branched isomers, its salts and any related compound that contains a linear or branched perfluoroheptyl (C7H15C) group and which can degrade to linear or branched PFOA	• Industrial Chemicals Environmental Management (Registry) Instrument 2022 and its amendment, schedule 7	• PFOS and its salts: 0.025 mg/kg; • PFOS-related compounds: 1 mg/kg (each or sum) Effective 1 July 2025	• prEN 17681-1 (textiles) or ISO 23702-1 (leather)
	PFAS compounds - Perfluorohexanesulfonic acid (PFHxS), including its linear and branched isomers, their salts and any substance containing a linear or branched perfluorohexylsulfonyl moiety that can degrade to PFHxS	• Industrial Chemicals Environmental Management (Registry) Instrument 2022 and its amendment, schedule 7	• PFOS and its salts: 0.025 mg/kg; • PFOS-related compounds: 1 mg/kg (each or sum) Effective 1 July 2025	• prEN 17681-1 (textiles) or ISO 23702-1 (leather)

06 Global requirements on hazardous substances

6.1 Test parameters & requirements (by country / region)

Country / region	Test parameters	Regulations/reference	Requirements (permissible upper limit)	Relevant test methods
Australia	Flame retardants – Tetrabromodiphenyl ether (tetraBDE); Pentabromodiphenyl ether (pentaBDE); hexabromodiphenyl ether (HexaBDE); heptabromodiphenyl (HeptaBDE); Octabromodiphenyl ether (OctaBDE); Decabromodiphenyl ether (DecaBDE); nonabromodiphenyl ether (all three congeners) (nonaBDE)	• Industrial Chemicals Environmental Management (Registry) Instrument 2022 and its amendment, schedule 7	• Articles of electrical and electronic equipment: sum of all mono- to decaBDE congeners: ≤ 1000 mg/kg (in homogenous materials) • Articles other than electrical and electronic equipment: sum of tetra-, penta-. hexa-, hepta-, octa-, nona- and decaBDE: ≤ 500 mg/kg Effective 1 July 2025	• ISO 17881-1
Austria	Chlorinated phenols - PCP	• Chemicals Prohibition Ordinance of 2003	• 5 mg/kg	• prEN 17134-2, or ISO 17070 modified with KOH extraction
	Formaldehyde	• Legislation of Formaldehyde BGBI Nr. 194/1990	• Textiles that normally come into contact with the skin and release more than 1500 mg/kg formaldehyde must bear the label “Enthält Formaldehyd. Es wird empfohlen, das Kleidungsstück zur besseren Hautverträglichkeit vor dem ersten Tragen zu waschen.” • *Note: This legislation has not been withdrawn but it is in conflict with REACH Annex XVII entry 72 and that the REACH requirement is mandatory and should be obeyed.	• ISO 14184-1, ISO 14184-3

06 Global requirements on hazardous substances

6.1 Test parameters & requirements (by country / region)

Country / region	Test parameters	Regulations/reference	Requirements (permissible upper limit)	Relevant test methods
Canada	Phthalates	• Canada Consumer Product Safety Act/ Phthalates Regulations (SOR/2016-188)	• DEHP, DBP, BBP: 0.1% by weight (each) for vinyl in toys and childcare articles for children under 4; • DINP, DIDP, DNOP: 0.1% by weight (each) for vinyl in toys or childcare articles that can be placed in the mouth of child under 4	• CPSC-CH-C1001-09.4
	Flame retardants	• Canada Consumer Product Safety Act, Schedule 2, item 10	• TRIS is prohibited in textile fabric used as wearing apparel	• ISO 17881-2
		• Canada Consumer Product Safety Act, Schedule 2, item 16	• TCEP is prohibited in the product made, in whole or in part, of polyurethane foam that is intended for a child under 3	• ISO 17881-2
		• Canada Consumer Product Safety Act / Children's Sleepwear Regulations (SOR/2016-169)	• Loose-fitting sleepwear that is treated with a flame retardant, any component that is extracted or broken down from such treated sleepwear and any flame retardant that is used to treat the sleepwear must meet specific requirements that protect against acute and chronic toxicity • The requirements are specified in subsection 3(2) of Children's Sleepwear Regulations	• In-house test method
	Heavy metals - cadmium	• Canada Consumer Product Safety Act / Children's Jewellery Regulation (SOR/2018-82)	• Jewellery for children under 15 years of age: • 130 mg/kg for the jewellery item that is small enough to be totally enclosed in the small parts cylinder illustrated in the schedule when a force of not more than 4.45 N is applied	• ASTM F2853-10 (Reapproved 2015) / CPSC-CH-E1003-09.1 / CPSC-CH-E1001-08.3 / CPSC-CH-E1002-08.3 / ASTM F963-17

06 Global requirements on hazardous substances

6.1 Test parameters & requirements (by country / region)

Country / region	Test parameters	Regulations/reference	Requirements (permissible upper limit)	Relevant test methods
Canada	Heavy metals - lead	• Canada Consumer Product Safety Act/ Surface Coating Materials Regulations (SOR/2016-193)	• Children's products (<14 years old) - Surface coating: 90 mg/kg	• ASTM F2853-10 (Reapproved 2015) / CPSC-CH-E1003-09.1
		• Canada Consumer Product Safety Act / Children's Jewellery Regulations (SOR/2018-82)	• Jewellery for children under 15 years of age: • Total lead: 90 mg/kg	• ASTM F2853-10 (Reapproved 2015) / CPSC-CH-E1003-09.1 / CPSC-CH-E1001-08.3 / CPSC-CH-E1002-08.3/ ASTM F963-17

		• Canada Consumer Product Safety Act / Consumer Products Containing Lead (Contact with Mouth) Regulations (SOR/2018-83)	• Total lead: 90 mg/kg for the following products:
			  • A product that is brought into contact with the user's mouth during normal use
			  • Clothing or clothing accessory that is intended for use by a child under 14 years of age;
			  • A product that is intended for use in learning or play by a child under 14 years of age;
			  • A book or similar printed product that is intended for a child under 14 years of age;
			  • A product whose primary purpose is to facilitate the relaxation, sleep, hygiene, carrying or transportation of a child under four years of age.
				• ASTM F963-17 / CPSC-CH-E1003-09.1 / CPSC-CH-E1001-08.3 / CPSC-CH-E1002-08.3

	Heavy metals - mercury	• Canada Consumer Product Safety Act/ Surface Coating Materials Regulations (SOR/2016-193)	• Surface coating: 10 mg/kg	• Determination of Total Mercury in Surface Coating Materials, Applied Coatings, and Cosmetic Samples by Direct Mercury Analyzer (DMA) (C07)

06 Global requirements on hazardous substances

6.1 Test parameters & requirements (by country / region)

Country / region	Test parameters	Regulations/reference	Requirements (permissible upper limit)	Relevant test methods
China	Azo dyes	• GB 18401-2010 (Textile Products)	• Textiles: 20 mg/kg (each amine)	• GB/T 17592, GB/T 23344
		• GB 20400-2006 (Leather and fur)	• Leather: 30 mg/kg (each amine)	• GB/T 19942
		• GB 25038-2010 (rubber Shoes)	• Textiles: Not used (Acceptable limit: 30 mg/kg)	• GB/T 17592, GB/T 23344
		• GB 30585-2014 (Safety technical specification for children's footwear)	• Textiles: 20 mg/kg (each amine); • Leather: 30 mg/kg (each amine)	• GB/T 17592 (textiles), GB/T 19942 (leather)
	Chlorinated phenols - PCP and 2,3,5,6-TeCP	• GB 25038-2010 (Rubber Shoes)	• Not detected (Detection limit:0.5 mg/kg (each))	• GB/T 18414.1-2006, GB/T 18414.2-2006
	Dimethylfumarate	• GB 30585-2014 (Safety technical specification for children's footwear)	• 0.1 mg/kg	• GB/T 26713
	Formaldehyde	• GB 18401-2010 (Textile Products)	• Infants' textile products (0-36months): 20 mg/kg; • Textile products with direct contact to skin: 75 mg/kg; • Textile products without direct contact to skin: 300 mg/kg	• GB/T 2912.1
		• GB 20400- 2006 (Leather and fur)	• Infants' products (0-36months): 20 mg/kg; • Products with direct contact to skin: 75 mg/kg; • Products without direct contact to skin: 300 mg/kg	• GB/T 19941
		• GB 25038-2010 (Rubber Shoes)	• Infants' canvas rubber or rubber shoes (0-36months): 75 mg/kg; • Other canvas rubber or rubber shoes: 150 mg/kg	• GB/T 2912.1

06 Global requirements on hazardous substances

6.1 Test parameters & requirements (by country / region)

Country / region	Test parameters	Regulations/reference	Requirements (permissible upper limit)	Relevant test methods
China	Formaldehyde	• GB 30585-2014 (Safety technical specification for children's footwear)	• Infants' footwear (0-36 months, footwear ≤170mm): 20 mg/kg • Materials with direct contact to skin: 75 mg/kg • Materials without direct contact to skin: 300 mg/kg	• GB/T 2912.1 (textiles), GB/T 19941 (leather)
	Heavy metals - arsenic	• GB 28480-2012 (Adornment-Provision for limit of baneful elements)	• Adult and children's adornments: 1000 mg/kg (Total)	• GB/T 28019, GB/T 28020, GB/T 28021
		• GB 30585-2014 (Safety technical specification for children's footwear)	• 100 mg/kg	• QB/T 4340
	Heavy metals - cadmium	• GB 28480-2012 (Adornment-Provision for limit of baneful elements)	• Adult and children's adornments: 100 mg/kg (Total)	• GB/T 28019, GB/T 28020, GB/T 28021
		• GB 30585-2014 (Safety technical specification for children's footwear)	• 100 mg/kg	• QB/T 4340
		• GB 31701-2015 (Safety Technical Code for Infants and Children Textile Products)	• 100 mg/kg	• GB/T 30157
	Heavy metals - Chromium VI	• GB 28480-2012 (Adornment-Provision for limit of baneful elements)	• Adult and children's adornments: 1000 mg/kg (Total)	• GB/T 28019, GB/T 28020, GB/T 28021
		• GB 30585-2014 (Safety technical specification for children's footwear)	• Leather:10 mg/kg	• GB/T 22807

06 Global requirements on hazardous substances

6.1 Test parameters & requirements (by country / region)

Country / region	Test parameters	Regulations/reference	Requirements (permissible upper limit)	Relevant test methods

China	Heavy metals - extractable	• GB 21550-2008 (Restriction of hazardous materials in polyvinyl chloride (PVC) artificial leather)	• PVC artificial leather:
			  • Pb: 90 mg/kg;
			  • Cd: 75 mg/kg
				• GB 21550-2008 section 5.4

		• GB 25038-2010 (Rubber Shoes)	• Pb: 1.0 mg/kg; • Cd: 0.1 mg/kg; • As: 1.0 mg/kg;	• GB/T 17593.1-2006, GB 17593.4-2006, GB/T 17593.2-2007
		• GB 28480-2012 (Adornment-Provision for limit of baneful elements)	• Children's adornments: • Sb: 60 mg/kg; • As: 25 mg/kg; • Ba: 1000 mg/kg; • Cd: 75 mg/kg; • Cr: 60 mg/kg; • Pb: 90 mg/kg; • Hg: 60 mg/kg; • Se: 500 mg/kg	• GB/T 28019, GB/T 28020, GB/T 28021
	Heavy metals - lead	• GB 28480-2012 (Adornment-Provision for limit of baneful elements)	• Children's adornments: 300 mg/kg (Total); • Adult adornments: 1000 mg/kg (Total)	• GB/T 28019, GB/T 28020, GB/T 28021
		• GB 30585-2014 (Safety technical specification for children's footwear)	• 100 mg/kg	• QB/T 4340
		• GB 31701 - 2015 (Safety Technical Code for Infants and Children Textile Products)	• Infants and children's textile products containg coating or paint dyeing: 90 mg/kg	• GB/T 30157

06 Global requirements on hazardous substances

6.1 Test parameters & requirements (by country / region)

Country / region	Test parameters	Regulations/reference	Requirements (permissible upper limit)	Relevant test methods
China	Heavy metals - mercury	• GB 28480-2012 (Adornment-Provision for limit of baneful elements)	• Adult and children's' adornments: 1000 mg/kg (Total)	• GB/T 28019, GB/T 28020, GB/T 28021
	Heavy metals - nickel	• GB 28480-2012 (Adornment-Provision for limit of baneful elements)	• Earrings and body-piercing products: 0.2 μg/cm2/week; • Adornments with direct skin contact 0.5 μg/cm2/week	• GB/T 19719 • GB/T 28485
	N-nitrosamines	• GB 25038-2010 (Rubber Shoes)	• Not detected	• GB/T 24153
		• GB 30585-2014 (Safety technical specification for children's footwear)	• Not detected (for rubber parts of infants' footwear (0-36 months, footwear≤170mm))	• GB/T 24153
	Odour	• GB 30585-2014 (Safety technical specification for children's footwear)	• Grade 2	• QB/T 4546-2013 Section 6.2
	pH value	• GB 18401-2010 (Textile Products)	• Infants' textile products (0-36months): 4.0-7.5; • Textile products with direct contact to skin: 4.0-8.5; • Textile products without direct contact to skin: 4.0-9.0;	• GB/T 7573
		• GB 25038-2010 (Rubber Shoes)	• 4.0-9.0	• GB/T 7573

06 Global requirements on hazardous substances

6.1 Test parameters & requirements (by country / region)

Country / region	Test parameters	Regulations/reference	Requirements (permissible upper limit)	Relevant test methods
China	Phthalates	• GB 30585-2014 (Safety technical specification for children's footwear)	**Accessible parts:** • Infants' footwear (0-36 months, footwear ≤170mm): DEHP, DBP, BBP, DINP, DIDP, DNOP: 0.1% by weight • Children's footwear (36 months - 14 years, footwear >170mm, but ≤250mm): DEHP, DBP, BBP: 0.1% by weight	• ISO 16181
		• GB 31701-2015 (Safety Technical Code for Infants and Children Textile Products)	• Infants and children's textile products textiles containing coating and print dyeing: DEHP, DBP, BBP: 0.1% by weight; DINP, DIDP, DNOP: 0.1% by weight	• GB/T 20388
	Vinyl chloride monomer content	• GB 21550-2008 (Restriction of hazardous materials in polyvinyl chloride (PVC) artificial leather)	• 5 mg/kg	• GB/T4615-1984
	Other Volatile Matter Content	• GB 21550-2008 (Restriction of hazardous materials in polyvinyl chloride (PVC) artificial leather)	• 20 g/m2	• GB 21550-2008 section 5.5 • GB/T 2918-1998
Denmark	Fluorinated greenhouse gases – HFCs, SF6 and PFCs	• Danish Statutory Order No. 1326 of 19 November 2018	• New products containing hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulfur hexafluoride (SF6) are prohibited.	• In-house test method
	Heavy metals - cadmium	• Danish Statutory Order No. 858 of 5 September 2009	• Surface treatment (cadmium plating), colour pigment, or plastics stabilise:75 mg/kg (excluded those area covered by REACH Anne XVII, entry 23)	• EN 16711-1

Quick guide

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09 Quick guide

9.1 Drawstrings guideline

One of the most common reasons for the recall of children's clothing in Europe and North America is presence of drawstrings or cords on the children's apparel. Drawstrings or cords on children's clothing may catch on items such as playground equipment, bus doors or cots and lead to death or injury.

In United States, total 99 incidents (including 26 death) associated with neck/hood drawstrings on children's outerwear27 between January 1985 and June 2019, involving children 18 months to 15 years of age.

To reduce the risk of the entanglement hazard due to presence of drawstrings or cords on children's clothing, several countries have implemented safety measures either by implementing regulatory standards or voluntary safety guidelines. The United States and Europe have very strict requirements for drawstrings and cords.

Challenges of Manufacturer and Retailers
Many retailers and manufacturers are selling clothing to multiple countries so that they can expand their market share. Understanding and complying with varied drawstring requirements among various countries are one of the challenges for retailers and manufacturers.

The purpose of this section is to compare various drawstring requirements to be met for the sale of children clothing in the United States, Canada, European Union and Australia.

Country-wise Drawstring Requirements:

1. **United States:**

- **1.1 Federal legislation**
  In February 1996, the U.S. Consumer Product Safety Commission (CPSC) issued guidelines to help prevent children from strangling or getting entangled on the neck and waist drawstrings of upper outerwear garments, such as jackets and sweatshirts. In June 1997, ASTM adopted a voluntary standard, ASTM F1816-97, Standard Safety Specification for Drawstrings on Children's Upper Outerwear that incorporated CPSC's guidelines.

  CPSC's drawstring guidelines did not represent a standard or mandatory requirement set by the agency. And, while CPSC did not sanction them as the only method of minimising drawstring injuries, CPSC believed that these guidelines would help prevent children from strangling by their clothing drawstrings. Although there was no mandatory requirements on drawstring after publishing the drawstring guidelines and given the cooperative effort by a number of manufacturers and retailers, CPSC noticed significant reduction in the annual average number of reported incidents associated with drawstring entanglement.

On 12 May 2006, the CPSC posted a letter on their website for the manufacturers, importers, and retailer for compliance with the industry standard, ASTM F 1816–97. The letter also explained that CPSC considered children's upper outerwear with drawstrings at the hood or neck area to be defective and to present a substantial risk of injury under section 15(c) of the Federal Hazardous Substances Act (FHSA), 15 U.S.C. 1274(c) and non-compliance will be assessed by civil penalties.

From 2006 through 2010, CPSC participated in 115 recalls of non-complying products with drawstrings.

The Consumer Product Safety Improvement Act of 2008 ("CPSIA"), authorises the U.S. Consumer Product Safety Commission (CPSC) to specify, by rule, for any consumer product or class of consumer products, characteristics whose existence or absence shall be deemed a substantial product hazard under certain circumstances. In August 2011, Director of the Federal Register has approved the final rule to determine that children's upper outerwear garments in sizes 2T to 12 or the equivalent, which have neck or hood drawstrings, and in sizes 2T to 16 or the equivalent, which have waist or bottom drawstrings that do not meet specified criteria, present substantial product hazards (16 CFR Part 1120). Those products should comply with ASTM F1816-97.

09 Quick guide

9.1 Drawstrings guideline

- **1.2 State legislations**
  Before CPSC's mandatory regulation came into effective, New York and Wisconsin have implemented mandatory laws for drawstrings.

  1.2.1 New York: New York State General Business Law, Section 391-b(2) which is stricter than the CPSC's guidelines, prohibits the sale of any children's clothing from size 2-T to 16 that includes a drawstring at the neck, at the bottom opening of an upper body garment or at the waist of a lower body garment.

  1.2.2 Wisconsin: Wisconsin State law ATCP 139, "Consumer Product Safety" has banned the selling of children's products, which present a serious and unreasonable hazard to child health and safety.

2. Canada

In December 2000, Health Canada published advisory notice Advisory 2000-111 ("Potential Strangulation from Drawstring's on Children's Outerwear") which mirrors the ASTM standard (ASTM F1816-97).

3. European Union

The General Product Safety Directive (Directive 2001/95/EC) requires that products placed on the market be safe. This also applies to children clothes. The Directive has been transposed as binding regulations in all the EU Member states.

The European Commission (EC) adopted an updated harmonised standard (EN 14682: 2014, "Safety of Children's Clothing – Cords and Drawstrings on Children's Clothing-Specifications") which limits the use of drawstrings in children's apparel. The purpose of this standard is to minimise the risk of accidental entanglement by cords and drawstrings on children's clothing.

This updated standard was published in the Official Journal of the European Union (OJEU) 2015/C335/01 of 09 Oct 2015. As a result, clothing in compliance with the safety requirements prescribed by this standard was presumed to be in compliance with the general safety requirement of the GPSD.

In Ireland, Hood Cords for Children's Clothing, SI 1976 No. 140 came into operation on 1 October 1976. Therefore, products distributed in the Ireland must comply with this requirement in addition to the requirements of EN 14682:2014.

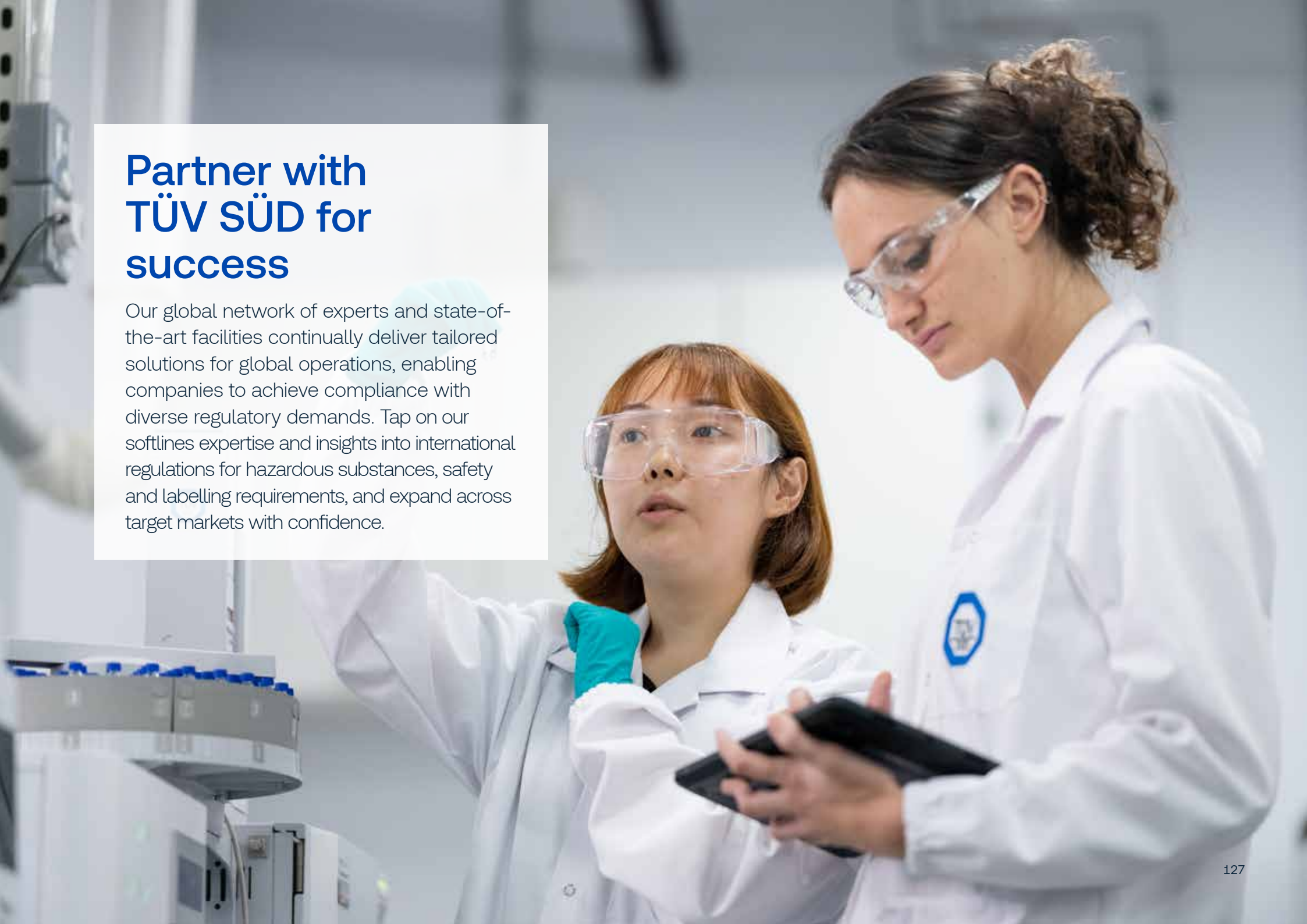
In the United Kingdom (UK), SI 1976 No. 2, The Children's Clothing (Hood Cords) Regulations was effective up till 30 September 2012 and it has been revoked by The Product Safety (Revocation) Regulations 2012. (SI 2012 No. 1815) has been effective since 1 October 2012.

4. Australia

According to the Australian Competition & Consumer Commission (ACCC), there have been no fatalities reported in Australia from accidents involving drawstrings. To ensure that drawstring hazards continue to be minimised, the ACCC urged cooperation from suppliers to follow a voluntary guideline. ACCC's voluntary guideline is based on US and European standards (ASTM F1816 and EN 14682).

5. China

According to the GB 31701-2015, textiles products for infants and children containing cords or drawstrings should comply with mandatory requirement as mentioned in the standard. More details will be elaborated in the later session.



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10 TÜV SÜD softlines services

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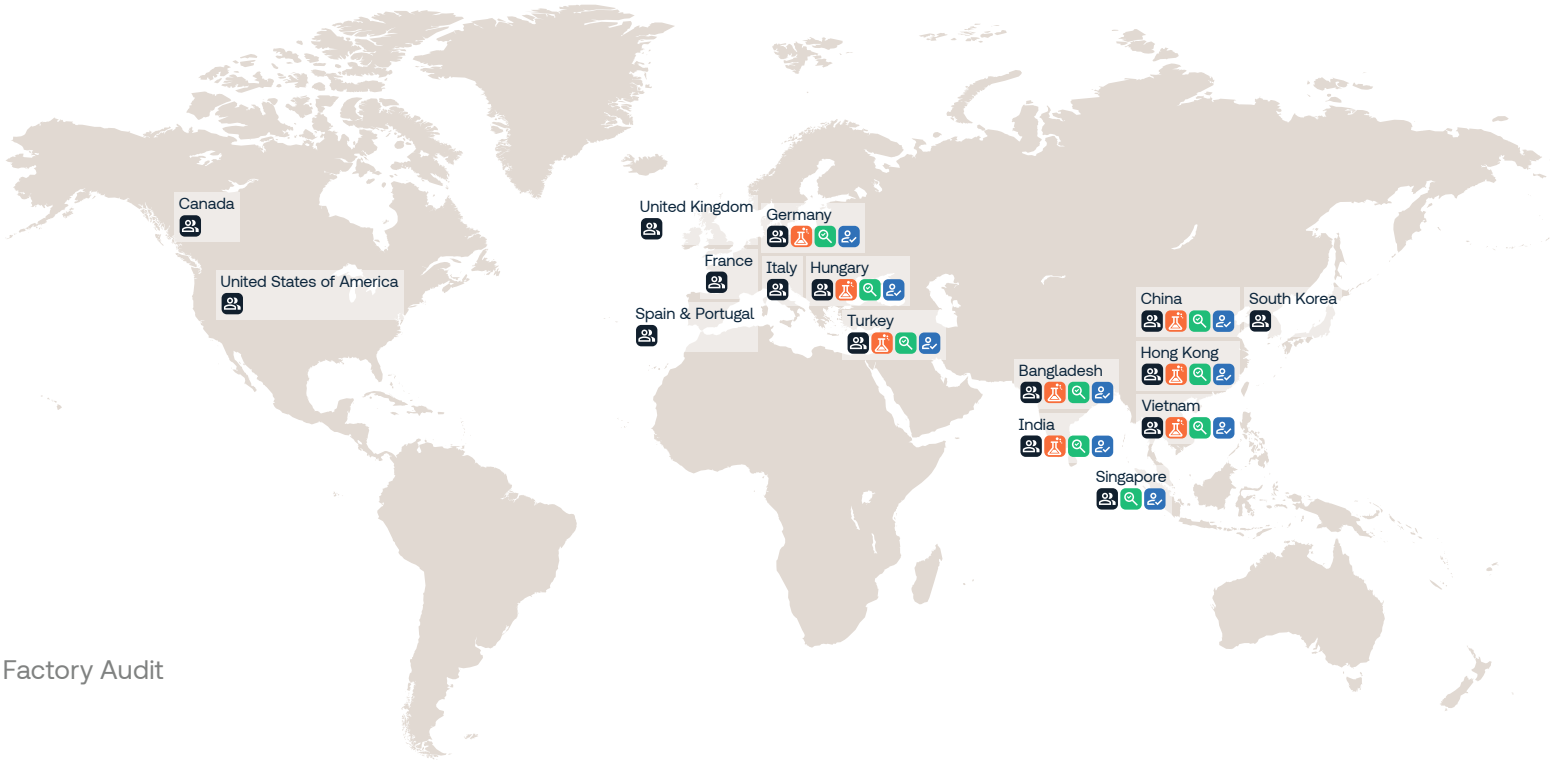

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