



BSI Standards Publication

# Textiles — Safety of children's clothing — Guidance on the use of EN 14682:2007 Cords and drawstrings on children's clothing — Specifications

### **National foreword**

This Published Document is the UK implementation of CEN/TR 16446:2012.

The UK participation in its preparation was entrusted to Technical Committee TCI/66, Apparel and interior textiles.

A list of organizations represented on this committee can be obtained on request to its secretary.

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TECHNICAL REPORT  
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**CEN/TR 16446**

December 2012

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English Version

**Textiles - Safety of children's clothing - Guidance on the use of  
EN 14682:2007 Cords and drawstrings on children's clothing -  
Specifications**

Textiles - Sécurité des vêtements d'enfants - Guide sur  
l'utilisation de l'EN 14682:2007 Cordons et cordons  
coulissants sur les vêtements d'enfants - Spécifications

Textilien - Sicherheit von Kinderbekleidung - Anleitung zur  
Anwendung von EN 14682:2007 Kordeln und Zugbänder  
an Kinderbekleidung - Anforderungen

This Technical Report was approved by CEN on 8 October 2012. It has been drawn up by the Technical Committee CEN/TC 248.

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## Contents

Page

Foreword.....	3
1 <b>Scope</b> .....	4
2 <b>Requests for further clarification</b> .....	4
3 <b>Common questions and answers in relation to the clarification of EN 14682:2007</b> .....	4

## Foreword

This document (CEN/TR 16446:2012) has been prepared by Technical Committee CEN/TC 248 "Textiles and textile products", the secretariat of which is held by BSI.

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EN 14682:2004 *Safety of Children's Clothing – Cords and drawstrings on Children's Clothing – Specification* was developed in response to European Commission Mandate M 309, and harmonized under the General Product Safety Directive in July 2007. However, noting industry comments on EN 14682:2004, a revision was commenced in 2005, published in 2007, and harmonized in March 2011.

An EU Commission report on the adoption of EN 14682 was commissioned in 2008. The report highlighted the need for additional guidance for industry and market surveillance authorities to explain the technical aspect of garment design and manufacture. Children's clothing, like adult clothing, is highly fashionable, resulting in changing garment styles. The aim of this Technical Report is to assist all stakeholders in this fast changing and inventive industry.

At the time of development, a revision of EN 14682:2007 is in progress, and once this is published this Technical Report may be withdrawn.

## **1 Scope**

This Technical Report has been written to help all users of EN 14682:2007 with the understanding of garment styling and the harmonized standard.

The Technical Report is in 'Question and Answer' format. All the garments mentioned are examples of frequently asked questions raised by the clothing industry or market surveillance authorities. The responses have been reviewed and agreed upon by CEN/TC 248/WG 20.

## **2 Requests for further clarification**

A request for further clarification via a guidance document may be submitted by a CEN member body through its national committee. The requests are channelled to WG 20 which deals with the request.

A request for help may lead to:

- a) a clarification of the standard;
- b) a no-action required; that is no clarification or amendment to the standard currently required
- c) a proposal for an amendment of the standard. (In the short-term pending publication of the revised EN 14682:2007, it may be necessary to provide additional information.)

## **3 Common questions and answers in relation to the clarification of EN 14682:2007**

### **3.1 Questions concerning the scope**

#### **3.1.1 Why are hoods on garments not considered by this standard?**

The mandate M 309 provided by the EU Commission for the development of EN 14682 was in relation to entrapment of children by cords and drawstrings on garments. A hood is neither a drawstring nor a cord. Hoods are therefore outside the scope of the standard.

Nevertheless, the working group actively requested the assistance of CEN/TC 248 members and authorities for information concerning entrapment of children caused by hoods attached to garments, with the intention of developing a standard if necessary. Over a 5-year period, no data was identified where the hood had resulted in the entrapment. There were accidents involving garments with hoods, however the hood had not been the cause of the entrapment. CEN/TC 248 concluded that there was no evidence to support the need for a safety standard dealing with hazards associated with entrapment of children by hoods on garments.

**Action:** No action required.

#### **3.1.2 Why are disguise costumes listed in scope of EN 14682?**

Disguise costumes, dressing up and carnival clothes worn by children for play should meet the Toys Safety Directive and the requirements described in EN 71, *Safety of Toys*. In addition, garments should meet the requirements of EN 14682 and EN 71. Garments worn for party wear are subject to the same safety requirements as normal clothing, because children are likely to be unsupervised.

**Action:** Annex C "Rationale" in revised EN 14682 to be improved.

### **3.1.3 Why are boots and shoes with long laces, and child use articles such as bibs not in the scope?**

These items are not within the scope of products of CEN/TC 248 Textiles and Textile Products. It is for the respective technical experts of footwear and child-use and care articles to assess.

**Action:** Explanation of rationale for exclusions to be included in revision of EN 14682.

### **3.1.4 Are gloves joined by a cord such as those worn by young children to prevent loss of gloves a hazard?**

Gloves are not in the scope of the standard. The General Product Safety Directive applies and a risk assessment should be carried out to assess if the cord is a hazard.

**Action:** No action required.

### **3.1.5 Why are braces (suspenders) outside the scope of EN 14682?**

Braces (suspenders) are used to hold a garment up, for example trousers or a skirt, and are therefore close-fitting to the wearer, so there is no hazard of strangulation, or entrapment in a moving vehicle.

**NOTE** Between 2007 and 2010 there was a fashion to wear braces off the shoulder, and hanging from the waist area. This fashion was not and could not have been anticipated during the development of EN 14682:2007. This style of wearing is not acceptable for children's clothing, as the long loops created by the braces present a risk of entrapment in a moving vehicle.

**Action:** No action required.

### **3.1.6 Why are religious clothes not in the scope?**

Certain religious groups wear under garments of religious significance. These garments are worn all the time and have been worn for many years. The long cords on these undergarments are usually worn concealed, so there is very limited probability of an entrapment hazard. Published accident data has not attributed entrapment accidents to these types of garments, so these garments are therefore outside the scope.

**Action:** Annex C "Rationale" in revised EN 14682 to be improved.

### **3.1.7 Are swim suits, bikinis and board shorts considered to be specialist sportswear?**

No. These garments are worn for play, often for long periods and when children are relatively unsupervised. The kinds of activities might include use of climbing frames, slides, etc. and so swimsuits, bikinis and board shorts are covered by the provisions of the standard.

Specialist sportswear is the kind of garment worn for limited periods for participation in training or competition sport activities.

**Action:** Improved explanation for rationale for exclusions to be included in the revision of EN 14682.

### **3.1.8 Are bags sold with the garment excluded from the scope?**

Yes, co-ordinating bags are considered to be accessories not part of the garment. To meet the requirements of the General Product Safety Directive, bags should have a safety risk assessment.

**Action:** No action required.

## 3.2 Questions concerning terms and definitions

### What is a three dimensional (3D) embellishment?

A three dimensional embellishment is any decorative item attached to a cord that is thicker than the cord itself.

NOTE Thin materials such as plastic sleeving (bootlace ends) which are not thicker than the cord itself are not considered three dimensional embellishments.

Generally, thin textile materials which are not thicker than the cord itself will not create a hazard.

**Action:** To be clarified in the revision of EN 14682.

## 3.3 Questions concerning requirements

### 3.3.1 How should decorations near the end of the decorative cords or functional cord be considered?

The three-dimensional embellishment at any point of the cord may present a hazard of entrapment and therefore a full risk assessment should be carried out

**Action:** No action required.

### 3.3.2 Elastic cords with free ends are not permitted in hood and neck area. What is the rationale?

Elastic cords with free ends or protruding loops may snap back into the face if pulled, resulting in eye, facial or neck injury especially if a toggle is present.

**Action:** Annex C "Rationale" in revised EN 14682 to be improved.

### 3.3.3 Are hood extensions used to fasten a hood considered as adjusting tabs and therefore subject to requirements of subclauses 3.2.2 and 3.4.2?

No, the hood extension as illustrated in Figure 1 is integral to the hood and does not present any more risk than the hood itself.

**Action:** No action required.



Figure 1 — Example of a hood extension



**3.3.4 Shoulder straps and halter neck styles are kinds of functional cords. May these be made of elastic materials?**

Yes. Shoulder straps which have no free ends will never have ends which can "snap" back on the wearer's face. Those straps with free ends will not be long enough to present a hazard.

**Action:** No action required.

**3.3.5 Is it acceptable for bikinis with no free ends to use a halter neck clasp?**

Yes. The closing mechanism at the end of the cord (halter neck garment) should not be considered as an entrapment hazard because the cord sits close to the body.

**Action:** No action required.

**3.3.6 Is it acceptable to have shoulder straps or halter neck straps which may be adjusted by means of a ring and slider mechanism**

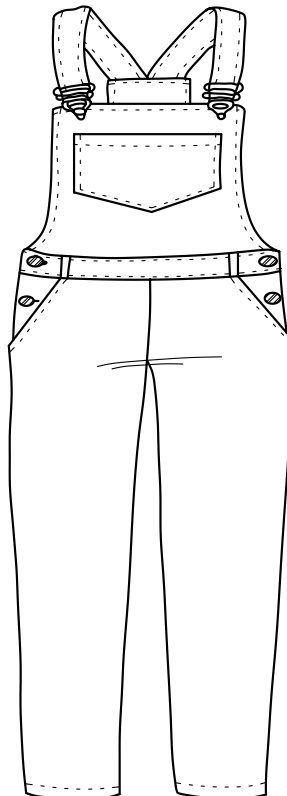
Yes, provided the loop is flat and close to the body. As the loop is adjustable it will be of variable length.

**Action:** To be addressed in the revision of EN 14682.

**3.3.7 Dungarees have shoulder straps. Is it acceptable for these to be detachable and adjustable?**

Yes, provided the free ends of the straps are inside the garment

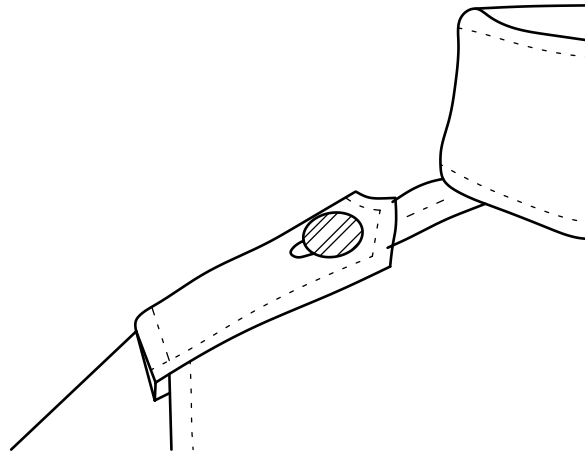
Figure 2 is an example of dungarees with shoulder straps.



**Figure 2 — Example of dungarees with shoulder straps**

**Action:** No action required.

**3.3.8 How should tabs on the shoulder of a garment be considered?**



**Figure 3 — Example of tabs on the shoulder of a garment**

Tabs on the shoulder, even if decorative, should meet the same requirements as adjusting tabs

**Action:** No action required.

**3.3.9 Are adjusting tabs on backs and tops of hoods acceptable? These do not appear to be mentioned in EN 14682:2007.**

Yes, adjusting tabs are permissible provided that the length is no more than 75 mm.

**Action:** To be addressed in the revision of EN 14682.

**3.3.10 Are loops for fastening garments such as a duffel coat acceptable?**

Yes, provided the protruding fixed loops are a maximum of 75 mm in circumference.

**Action:** No action required.

**3.3.11 Is the cord to which a toggle button is attached on a duffel coat a functional cord?**



**Figure 4 — Example of a toggle button**

No it is a fixed loop.

**Action:** No action required.

### 3.3.12 When assessing a sash or tied belt, what is the correct method for assessing the length?

With the belt or sash in place, lay the garment flat on the table with opening closed

Cross the sash or tied belt as if to tie in a knot.

Straighten the free ends of the sash or tied belt, and measure the length of the free ends.

If the sash or tied belt is not permanently attached to the garment, adjust the lengths of the free ends to be uniform, then measure.

If the sash or tied belt is permanently attached and the free ends are not equal in length, the longest end shall be measured.

**Action:** Improved measurement method to be added to the revision of EN 14682, Annex D.

### 3.3.13 Is a scarf tied around the waist of a garment acceptable?

If the width of the scarf is greater than 30 mm, it should be considered as a sash or tied belt. If the width of the scarf is less than 30 mm, it should be considered as a cord or, if threaded through belt loops, as a drawstring and meet the relevant requirements.

**Action:** No action required.

### 3.3.14 Is it acceptable for free ends of a sash to be shaped?

Yes, provided the ends do not present additional bulk which might lead to an entrapment hazard. When assessing the length of the sash, the measurement should be taken to the longest point of the shaped sash end.

**Action:** No action required.

**3.3.15 Are the cords on the sides of a pinafore dress to be considered as sashes or functional cords? There are two cords on both sides of the dress to tie the front and back of the dress together at the waist. The cords are more than 30 mm wide.**



Figure 5 — Example of waist cords on a pinafore dress

As the cords are wider than 30 mm and are tied at the waist they are considered as a sash. The requirements of sashes and tied belts to be tied at the front apply to those tied at the side.

**Action:** To be clarified in the revision of EN 14682.

**3.3.16 Are sashes or tied belts sewn to the garment from the side seam acceptable?**



**Figure 6 — Example of sash or tied belt**

Yes, provided the sashes meet the requirements for sashes and tied belts.

**Action:** No action required.

**3.3.17 How should cords designed to be tied on the side of the body, such as on bikini pants, to be considered?**

The functional cords (or tied belts) should be evaluated in the same way as a functional cord or tied belts on the front of the garment.

Cords which emerge from the side, but are designed to be tied at the back should meet the requirements of EN 14682:2007, subclause 3.6.

**Action:** No action required.

**3.3.18 Where a garment has a cord at the waist, how is the acceptable length measured?**

The cord should be measured from the last exit point on the garment, or the last loop, to the end of the cord

**Action:** To be clarified in the revision of EN 14682.

**3.3.19 For board shorts with four eyelets, is the exit point measured from the exit point of the eyelet or from the garment?**

From a risk point of view, the hazard is when the garment is on the body, it is therefore recommended that the measurement is taken from the last exit point.

**Action:** No action required.

**3.3.20 Is it acceptable to have a fringe on the garment?**

Fringes are not considered in EN 14682:2007 and a separate risk assessment is required.

**Action:** To be addressed in the revision of EN 14682.

**3.3.21 Where cords are at lower hems of garment, and it is not obvious if this is below the crotch, how should these be assessed. It is not clear from subclause 3.5**

Where it is not obvious if the garment will hang below the crotch, the more stringent requirements of subclause 4.5 should apply

**Action:** To be addressed in the revision of EN 14682.

**3.3.22 Are strings at the hems of capri (3/4 length) trousers acceptable?**

Yes if the strings do not hang below the lower hem of the trouser, see EN 14682:2007 subclauses 3.5.1, 3.5.2 and 3.1

**Action:** No action required.

**3.3.23 EN 14682 subclause 3.7 describes how to assess cords on long sleeve garments and on short sleeve garments. How are cords on 3/4 length sleeves to be assessed?**

The garment sleeves are not the hazard, the cords hanging from the sleeve are the hazard. The hazard will depend on the length of the cords and the location on the sleeve. EN 14682 provides specifications for short sleeves and long sleeved garments. If the cords are below the elbow, these should be considered as for long sleeved garments: if the cords are above the elbow, consider as short sleeve garments

**Action:** To be included in an informative annex in the revision of EN 14682.

**3.3.24 Are hanging loops (for display purposes in store) acceptable?**

Where hanging loops do not meet the requirements of fixed loops EN 14682, a risk assessment should be done. Hanging loops on the inside of the garment are satisfactory provided they present no protrusion or additional hazard in wear. It may be necessary to make them removable or easily detachable. Other functional loops internal to the garment should be considered similarly.

**Action:** No action required.

### **3.4 Questions concerning annexes**

**3.4.1 Please provide more information on Annex C "Rationale".**

**3.4.1.1 Rationale for garments outside of scope**

In excluding garments from the scope of EN 14682:2007 consideration was given to detailed available data.

Garments and other articles which are outside of the scope should be subject to a safety risk assessment as required by the General Product Safety Directive.

- a) **Child use and care articles for example bibs, nappies and soother holders.** These are outside the scope of CEN/TC 248 "Textiles and Textile Products". These items fall within the scope of CEN/TC 252 "Child use and care articles".
- b) **Shoes, boots and similar footwear.** These items fall outside the scope of CEN/TC 248 "Textile and Textile Products". These items are within the scope of CEN TC 309 "Footwear".
- c) **Gloves, hats, bonnets and scarves:**

- 1) **Gloves.** Gloves do not have long strings and no hazard was identified. If, however, a string is provided to join the pair of gloves, such that the cord passes through the sleeves of an outer garment, it is possible that a hazard may be introduced. A full risk assessment will be necessary by the producer.
  - 2) **Hats and bonnets.** The only information available involving cords and drawstrings in relation to hats, bonnets, caps etc appears to be relating to the strength of an elastic cord which can recoil on the face resulting in discomfort. No information was available at the time of drafting this standard to suggest cords and strings on hats and bonnets presented a hazard of entrapment.
  - 3) **Scarves.** These are by nature long and designed to be worn round the neck. For young children, scarves are usually worn under adult supervision and may be designed in shorter lengths to reduce any potential tripping or entrapment hazard. Scarves should be fully risk assessed for hazards.
- d) **Neckties designed to be worn with a shirt or blouse.** In the majority of occasions, neckties are worn for formal events occasions where adult supervision is normal e.g. school, religious ceremonies. Studies of data indicate that neckties have been linked to fatalities; however, these have been reported as suicides, that is intended acts by the wearer and not accidental entrapment. The scope of this standard is accidental entrapment.
- e) **Belts and braces.** Belts and braces that are used to hold a garment up, for examples trousers and skirts, are close fitting to the wearer and therefore not a hazard of strangulation or entrapment in moving vehicles. All garment accessories should be subjected to a full risk assessment to ensure that a hazard is not introduced during wear.
- f) **Religious clothing.** In certain religions, e.g. Judaism, under garments exist with long strings. These are worn all the time.
- g) **Celebratory clothing such as that worn at traditional civil or religious ceremonies or regional or national festivals provided this is worn for limited periods and under supervision.** Generally this clothing is worn under supervision and not for travel on vehicles or while playing on climbing equipment. If, however, the garments are foreseen as having "normal" wear, e.g. bridesmaid dress for party wear, it shall be included in the scope and meet the relevant specifications.
- h) **Specialist sportswear and activity wear generally worn for limited periods and under supervision, for example rugby shorts, wet suits, and dancewear, except where those garments are commonly worn as daywear or nightwear.** The key to the risk assessment is foreseeable use. If the garment can only be worn for a specialist sports activity because it provides certain features, e.g:
- 1) judogi, which is worn for the sport and not for everyday sports wear;
  - 2) wetsuit with long zip puller at the back to enable the wearer to get the garment on and off;
  - 3) rugby shorts worn for matches. Without the tie the shorts will not stay on during rugby scrums;
  - 4) swimsuits, bikinis, swimming trunks, board shorts worn on the beach and in the summer for unsupervised play are in scope. Similarly, replica football kits are usually worn by children for unsupervised play, and are in the scope.
- i) **Theatrical costumes used for theatrical performances;** these are worn for supervised activity, usually rehearsals or performances
- j) **Aprons intended to be worn over daywear, for limited periods and under supervision, to protect clothing from soiling during activities such as painting, cooking, or during meal times.** Overalls and aprons worn at school for lessons are by definition worn during a supervised activity. Young children in the home are also supervised. Consequently, the risk of entrapment is extremely low.

### 3.4.1.2 Requirements and acceptable lengths of drawstrings and cords

Before this standard was developed, some countries published voluntary requirements for limits on length of drawstrings, functional cords or decorative cords. However, the requirements were all different. During the development of EN 14682:2004, the experts of the working group reviewed the different types of garments with strings and the functionality of the strings and assessed the minimum length to facilitate a functional garment. This was compared with the accident data, and the *normal* classic style garments available.

The experiences of the UK and Ireland where legislation has been in place since 1976 demonstrated that elimination of drawstrings in hoods was key to safer garments for young children. This was extended to include all draw strings in the hood and neck area for young children , and decorative and functional cords which tie across the throat.

The lengths of 140 mm for a relaxed, i.e. unworn garment and 280 mm for a garment on the body, were set as a compromise between setting the maximum length of cord and ensuring the garment was functional. (The length of cord in the unworn garment needs to be long enough to enable the wearer to open the garment and slide over hips, this is especially important where the fabric of the garment is stretchy . In other garments, especially where the fabric is not stretchable, the drawstrings close the garment to the body to enable wear.)

**Action:** Annex C "Rationale" in revised EN 14682 to be improved.







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