International Drawstring Requirements
A Bureau Veritas Guidance Document
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EXECUTIVE SUMMARY

Drawstrings on children’s apparel can be hazardous and have led to deaths and injuries. Therefore several countries have taken measures through standards or safety advisories to reduce the risk of marketing and sale of garments with drawstrings that can be hazardous or even fatal to children. However, many retailers and manufacturers sell apparel in multiple countries and variations in drawstring requirements among various countries can be confusing. One set of requirements that cover their needs for selling in the United States (US), Canada and European Union (EU) would be ideal. The intent of this document is to compare the various standards and guidelines and determine if a “harmonized” drawstring requirement is possible for selling apparel in the United States, Canada, and European Union.

BACKGROUND

Drawstrings on children’s apparel can be hazardous and have led to deaths and injuries. Drawstrings can catch on playground equipment, cribs, bus doors, etc. and potentially strangle a child. Therefore Canada, the United States and the European Union have all issued standards or guidelines to minimize the risk of accidental entrapment by drawstrings or cords.

DRAWSTRING REQUIREMENTS

Canada:
Canada’s advisory notice (“Potential Strangulation from Drawstring’s on Children’s Outerwear”) mirrors the ASTM standard (ASTM F1816-97).

European Union:
The European Commission instituted a standard (EN 14682: 2004, “Safety of Children’s Clothing — Cords and Drawstrings on Children’s Clothing—Specifications”) which limits the use of drawstrings in children’s apparel. This standard was adopted as a national standard by member states in June 2005. The purpose of this standard is to minimize the risk of accidental entanglement by cords and drawstrings on children’s clothing. Factors used to develop the standard include: children’s ages, normal children’s behavior when playing, accident statistics concerning drawstrings, the nature of playground equipment, and the entrapment potential of strings at the hem.

The standard was published in the Official Journal of the European Union (OJEU) 2006/C171/04 of 22 July 2006. As a result, clothing in compliance with the safety requirements prescribed by this standard are now presumed to be in compliance with the general safety requirement of the General Product Safety Directive (GPSD), 2001/95/EC of the European Parliament and of the Council of 3 December 2001 on general product safety. Publication in the OJEU, does not make it a legal requirement that clothing must comply. However, the General Product Safety Directive is a legal requirement implemented in European countries and having articles that comply with harmonized standards such as EN 14682 is a way of demonstrating that the product is safe for aspects covered by the standard. Therefore, if a product does not comply with EN 14682, the seller could be prosecuted for not complying with the requirements of GPSD as this would be considered to be a relevant standard. In other words, if a product does not comply with EN 14682, the seller cannot be prosecuted for noncompliance to EN 14682 per se but could be prosecuted for not complying with the requirements of GPSD as this would be considered to be a relevant standard and requirements of EN 14682 is a means to ensure a safe product.
In the United Kingdom (UK), SI 1976 No. 2, The Children’s Clothing (Hood Cords) Regulations is more stringent than EN 14682 for drawstrings and cords (ties) in the hood and neck areas for children’s outerwear. Hood Cords for Children’s Clothing, SI 1976 No. 40 of Ireland is very similar to UK regulations. Therefore, products distributed in the UK/Ireland must comply with this requirement in addition to the requirements of EN 14682. For all other countries in the EU, products must be in compliance with EN 14682 only.

**United States:**
The United States Consumer Product Safety Commission (CPSC) worked with ASTM to develop a standard for the use of drawstrings on children’s apparel. The CPSC issued a voluntary guideline (“US Consumer Product Safety Commission Guidelines for Drawstrings on Children’s Outerwear”) and ASTM issued a standard (ASTM F1816-97, “Standard Safety Specification for Drawstrings on Children’s Upper Outerwear”) in 1997. 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 help prevent children from strangling by their clothing drawstrings. Although the CPSC guideline is “voluntary,” the CPSC under the Federal Hazardous Substance Act statute has the authority to recall apparel found in retail which contains drawstrings that do not meet the guidelines. Therefore, in practice, it is necessary to guide all clients to meet the guidelines.

In addition to the CPSC/ASTM guidelines, the states of New York and Wisconsin have implemented mandatory laws. Please reference the comparison charts in this document which delineate the differences between the various requirements. The most noteworthy concerning the US is that Wisconsin’s standard applies to a broader range of sizes (0-16) than the CPSC/ASTM and New York (2T-12). Additionally, the New York requirements for waist and bottom drawstrings apply to all children’s clothing, as opposed to only children’s upper outerwear for CPSC/ASTM and Wisconsin.

**Recommendations to Clients Selling Children’s Apparel in Multiple States/Regions/Countries:**

**When selling throughout the US:**
Wisconsin’s drawstring requirements are more stringent than that of CPSC/ASTM and New York in most areas. Most notably, Wisconsin’s requirements apply to a wider size range (0-16). However, New York’s requirements for the waist or bottom apply to all children’s clothing (not just children’s upper outerwear as in the CPSC/ASTM and Wisconsin requirements). Therefore, we recommend that a combination to include the most stringent of requirements be followed, as below:

<table>
<thead>
<tr>
<th>Location</th>
<th>Hood and Neck</th>
<th>Waist or Bottom</th>
</tr>
</thead>
<tbody>
<tr>
<td>Types of Apparel:</td>
<td>All Children’s Clothing</td>
<td>All Children’s Clothing</td>
</tr>
<tr>
<td>Sizes:</td>
<td>Sizes 0—16</td>
<td>Sizes 0—16</td>
</tr>
<tr>
<td>Requirements:</td>
<td>No hood/neck drawstrings are allowed</td>
<td>• No more than 3 inches of the drawstring shall be outside of the drawstring channel when the garment is extended to its fullest width</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Toggles, knots or other attachments shall not be used at the ends of the drawstring</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• The drawstring shall be sewn at the midpoint of the channel so it cannot be completely pulled out of the channel</td>
</tr>
</tbody>
</table>
When selling apparel in throughout the US and Canada:
Canada has adopted ASTM F1816-97. However, Wisconsin’s drawstring requirements are more stringent than that of the CPSC/ASTM and New York in most areas. Most notably, Wisconsin’s requirements apply to a wider size range (0-16). However, New York’s requirements for the waist or bottom apply to all children’s clothing (not just children’s upper outerwear as in the CPSC/ASTM and Wisconsin requirements). Therefore, we recommend that a combination to include the most stringent of requirements be followed, as below:

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<td></td>
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</tr>
</tbody>
</table>

When selling in throughout the US, Canada and the EU:
Certain parts of the EU requirements are more stringent than the US/Wisconsin/NY requirements:

- All size ranges (ages up to 14) are regulated.
- Drawstrings hanging below the hip cannot hang below the lower edge of the garment.
- Drawstrings cannot protrude from the bottom hem of coats, trousers or skirts that are designed to finish at the ankle.
- The standard also specifies drawstring requirements for sleeves and other parts of the garment.
- For hood and neck areas, EU standard covers all ages up to 14 years whereas US requirements covers up to 12 years. (Note: Age is used as an approximation as the measurement guidelines represent a retailer’s average customer. In the smaller sizes (up to size 8), the size translates to approximate age. For US sizing, size 10/12 is generally for ages 9-10, 14/16 is generally ages 11-12 and size 18 is generally 13-14 years.)

However, certain portions of the US (including New York and Wisconsin) requirements are more stringent:

- Only 3 inches of the drawstring are allowed to extend outside the drawstring channel, as opposed to 5.5 inches (140 mm) for the EU in the waist area.
- For hood and neck areas, the EU allows loop drawstrings for ages 7-14 whereas US does not allow any drawstring for sizes 2T-12-CPSC/NY (approximate age 10) and 0-16-WI (approximate age 12). However, the UK national legislation does not allow drawstrings and cords (ties) for hood and neck areas in children’s outer wear with chest measurement not exceeding 44 cm (approximately up to 13 years of age).

Therefore, it is recommended to follow one separate specification for US/Canada and one for the EU. Drawstrings specification for children’s apparel are specified in the following two (2) charts.
### International Drawstring Requirements

**Client Guidance Document**

<table>
<thead>
<tr>
<th>Types of Apparel</th>
<th>Citation</th>
<th>Specifications</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Children’s Clothing -</strong></td>
<td></td>
<td><strong>HEAD AND NECK AREA:</strong></td>
</tr>
<tr>
<td><strong>Sizes 0 - 16</strong></td>
<td>Standard Measurement per ASTM F1816</td>
<td>1. There shall be no functional drawstrings in the hood and neck area of children’s clothing sizes 0-16 (Including Outerwear and Non-Outerwear).</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>WAIST AREA ON UPPER (tops, jackets, dresses) AND BOTTOM (pants, skirts) GARMENTS:</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td>1. No more than 3 inches (75mm) of the drawstring shall be outside of the drawstring channel when the garment is extended to its fullest width;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2. Not have toggles, knots, or other attachments at the free ends</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3. Be bartacked at center back if the drawstring is a continuous string.</td>
</tr>
</tbody>
</table>
## DRAWSTINGS AND CORDS (TIES) SPECIFICATION FOR THE EUROPEAN UNION

<table>
<thead>
<tr>
<th>Types of Apparel</th>
<th>Citation</th>
<th>Specifications</th>
</tr>
</thead>
</table>
- Ages 0-6 yrs. 11 mo.: None allowed
- Outerwear with chest measurement ≤ 44 cm for UK distribution only: None allowed
- Ages 7-14 years: drawstrings cannot have free ends. Loop drawstrings allowed. No protruding loop when garment is open at its largest & the garment is laid flat. Maximum protruding loop circumference of 150 mm (6 inch) when the garment is at the size intended to fit
- No toggles, knots or other attachments at the ends of drawstrings but allowed on drawstrings with no free ends
- Cannot emerge from the back of the garment
- Secured (e.g., bartack) at midpoint of channel.  
**HOOD AND NECK AREA TIES/CORDS:**
- Ages 0-6 yrs. 11 mo.: None allowed
- Outerwear with chest measurement ≤ 44 cm for UK distribution only: None allowed
- Ages 7-14 years: Functional and decorative cords/ties cannot be more than 75mm (3 inch) in length at either end and cannot be made of elastic cords. Halter neck style garments must not have any loose ends in the hood and neck area.  
**WAIST AREA DRAWSTRING:**
- Ages 0-14 years: Waist area drawstrings protrude 140 mm (5.5 inch) maximum at each end when the garment is flat and less than 280 mm (11 inch) when closed to the intended waist size.
- Drawstrings hanging below the hip, cannot hang below the lower edge of the garment.
- Drawstrings cannot protrude from the bottom hem of coats, trousers or skirts that are designed to finish at the ankle.
- No toggles, knots or other attachments at the ends of drawstrings but allowed on drawstrings with no free ends
- Cannot emerge from the back of the garment
- Secured (e.g., bartack) at midpoint of channel
- Sashes (in a channel) when tied cannot hang below the hem of the garment
- Sash length when measured untied from the point where it is to be tied must not be more than 360 mm (14 inch) |
### DRAWSTINGS AND CORDS (TIES) SPECIFICATION FOR THE EUROPEAN UNION—continued

<table>
<thead>
<tr>
<th>Types of Apparel</th>
<th>Citation</th>
<th>Specifications</th>
</tr>
</thead>
</table>
  - Maximum length of 140 mm (5.5 inch) for functional and decorative ties/cords including any embellishment  
  - Sashes when tied cannot hang below the hem of the garment.  
  - Sash length when measured untied from the point where it is to be tied must not be more than 360 mm (14 inch)  

**SLEEVES DRAWSTINGS AND TIES/CORDS:**  
Lower edge of long sleeves: Must be inside of the garment when fastened  
Short sleeves: Sleeve must finish above the elbow. Maximum protruding length of 140 mm (5.5 inch) laid flat  

**DRAWSTINGS AND TIES/CORDS IN ALL OTHER AREAS:**  
Not protrude more than 140 mm (5.5 inch) when the garment is open to its largest
INTERNATIONAL COMPARISON

In light of the new EU standards, which became effective in August 2006, clients who sell apparel in more than one country need guidance on how to ensure that their products meet the requirement of all countries in which they sell. There are three key differences between US/Canada and Europe:

1. The specifications in US/Canada are defined by garment sizes whereas the specifications in Europe are defined by age.

2. The scope of the standard for Europe is clearly defined to include children’s clothing including disguise and costumes and skiwear. It does not include child care articles (nappies/diapers and soother/pacifier holders), shoes, boots and similar footwear, gloves, hats, scarves, neckties designed to be worn with a shirt or blouse, belts and braces, religious clothing, specially sportswear and activity wear (rugby shorts, wet suits and dancewear) and theatrical costumes used for theatrical performances. “Child use and child care articles” is also interpreted to include bibs and therefore do not come under the scope of the standard.

The scope of CPSC guidelines includes only children’s upper outerwear whereas New York and Wisconsin laws include all children’s clothing. Children’s clothing is not clearly defined by New York or Wisconsin. Bureau Veritas interprets this to include only articles of clothing and exempts apparel accessories (hats, belts, scarves, gloves, neckties, socks) and footwear.

3. The European standard specifies requirements for drawstrings as well as ties (defined as functional and decorative)

The following page includes a chart which summarizes the requirements of each regulated location.
# International Drawstring Requirements

## Client Guidance Document

### SUMMARY CHART FOR DRAWSTRINGS

<table>
<thead>
<tr>
<th>Country/State/Region:</th>
<th>US: (CPSC/ASTM)</th>
<th>New York</th>
<th>Wisconsin</th>
<th>Canada</th>
<th>EU *</th>
<th>UK/Ireland</th>
</tr>
</thead>
</table>

### HOOD AND NECK DRAWSTRING REQUIREMENTS

<table>
<thead>
<tr>
<th>Types of Apparel Included:</th>
<th>Children’s Upper Outerwear</th>
<th>All Children’s Clothing</th>
<th>All Children’s Clothing</th>
<th>Upper Outerwear</th>
<th>All Children’s Clothing</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sizes/Ages:</td>
<td><em>Sizes 2T– 6T</em></td>
<td><em>Sizes 2T – 16</em></td>
<td><em>Sizes 0 – 16</em></td>
<td><em>Sizes 2T– 12</em></td>
<td><em>Ages 0-14 (as below)</em></td>
<td>N/A</td>
</tr>
</tbody>
</table>

| Requirements:              | Drawstrings should not be used in the head/neck area | No hood/neck drawstrings are allowed | No hood/neck drawstrings are allowed | Drawstrings should not be used in the head/neck area | • Ages 0– 6 yrs. 11 mo.: No drawstrings • Ages 7-14 years: Drawstrings cannot have free ends. No protruding loop when garment is open at its largest & the garment is laid flat. Maximum protruding loop circumference of 150 mm (6 inch) when the garment is at the size intended to fit. Cannot emerge from the back of the garment. Must be secured (bartack) at midpoint. Toggles allowed on drawstrings with no free ends | No hood drawstrings are allowed |

* The United Kingdom regulation SI 1976 No. 2, Children’s Clothing (Hood Cords), is not in conflict with EN 14682, and will remain as national legislation.
## International Drawstring Requirements

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<table>
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<tr>
<th>Country/State/Region:</th>
<th>US: (CPSC/ASTM)</th>
<th>New York</th>
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<tbody>
<tr>
<td><strong>Waist or Bottom Drawstring Requirements</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
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<table>
<thead>
<tr>
<th>Types of Apparel Included:</th>
<th>Children’s Upper Outerwear</th>
<th>All Children’s Clothing</th>
<th>All Children’s Clothing</th>
<th>Upper Outerwear</th>
<th>All Children’s Clothing</th>
<th>N/A</th>
</tr>
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<tbody>
<tr>
<td><strong>Sizes/Ages:</strong></td>
<td>Sizes 2T–6T</td>
<td>Sizes 2T–16</td>
<td>Sizes 0–16</td>
<td>Sizes 2T–12</td>
<td>Ages 0–14 (as below)</td>
<td>N/A</td>
</tr>
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<td>Requirements:</td>
<td>• No more than 3 inches of the drawstring shall be outside of the drawstring channel when the garment is extended to its fullest width</td>
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<td>• Waist area drawstrings protrude 140 mm (5.5 inch) maximum at each end when the garment is flat and less than 280 mm (11 inch) when closed to the intended waist size</td>
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<td>• Drawstrings hanging below the hip, cannot hang below the lower edge of the garment Drawstrings cannot protrude from the bottom hem of coats, trousers or skirts that are designed to finish at the ankle</td>
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* The United Kingdom regulation SI 1976 No. 2, Children’s Clothing (Hood Cords), is not in conflict with EN 14682, and will remain as national legislation.
DEFINITIONS

Child’s Outer Garment (UK only): An outer garment (raincoat, overcoat, anorak or other outer garment for use as outer wear) having a measurement not exceeding 44 cm (17.32 in.) 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.

Decorative Cord (referred to as decorative tie in the US): Cord, chain, ribbon, string or tape of any textile or non-textile material with or without embellishment, such as toggle, pom-pom, feather or bead, of fixed length and not intended to be used to adjust the size of the opening or to fasten the garment itself.

Drawstring: Cord, chain, ribbon, string or tape of any textile or non-textile material that passes through a channel, loop(s) or eyelets(s) or similar, to adjust the size of the opening, or part of the garment or to fasten the garment itself. The ASTM definition specifies that a drawstring is a non-retractable cord.

Functional Cord (referred to as functional tie in the US): Cord, chain, ribbon, string or tape of any textile or non-textile material with or without embellishment, such as toggle, pom-pom, feather or bead, of fixed length, which is used to adjust the size of the opening, or part of the garment or to fasten the garment itself.

Hood: A loose, pliable covering for the head, either detachable or permanently attached to upper outerwear.

Loop: Cord or narrow strip of fabric curved in shape, which may be fixed or adjustable in length, where both ends are attached to the garment.

Sash (EU only): Drawstring, decorative or functional cord of textile material of not less than 30 mm (~1¼ inch) in width worn around the waist of a garment and tied into a bow.

Toggle: Wooden, plastic, metal or otherwise composed piece attached to, or present on, a drawstring for decorative purposes or to prevent the drawstring from being drawn through its channel.

Bureau Veritas Consumer Products Service: Your Partner for Quality Assurance

We are a proactive partner that helps companies manage risk, assure regulatory compliance, and protect their brand. From apparel and toys to consumer electronics and hard goods, we assist clients around the world to meet these objectives through the effective monitoring of product performance and quality.

For your softline and textile needs, we can work with you to identify quality concerns prior to distribution, monitor private label brands, and meet regulatory requirements for all your textile, apparel, and home furnishing products. We offer fabric and garment testing; care labeling determination and verification; flammability testing; fiber identification; and more.

With locations in 40 countries supported by more than 6,000 employees and over 30 years of experience, we are a quality assurance partner of choice for manufacturers and retailers around the world.
CONTACT US

For more information, please contact: Jennifer Hargrave, Senior Global Regulatory Consulting Specialist, Softlines, at 973-901-0831 or via email: jennifer.hargrave@us.bureauveritas.com

RELATED WEBSITES

The following are some websites that contain drawstring information:


US:  http://www.cpsc.gov
     http://www.cpsc.gov/CPSCPUB/PREREL/PRHTML96/96023.html
     http://www.cpsc.gov/CPSCPUB/PUBS/SUCCESS/strings.html
     http://www.cpsc.gov/CPSCPUB/PREREL/PRHTML94/94103.html