What you need to know to stay on the right side of regulations when decorating apparel.

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Panelists

- Sue DeRagon, UL
- Mary Poissant, Apple Imprints
Apparel Considerations

- Size
- Imprint
- Children’s Product Certificate (CPC)
- Secondary tracking labels
- Drawstrings
- **Focus for this session on decoration**
Level Set

• What are your obligations regarding apparel?
  • Suppliers / Distributors / Decorators
  • Orders for adults / youth / under 3
Size...
<table>
<thead>
<tr>
<th>ADULT SIZES</th>
<th>XS</th>
<th>S</th>
<th>M</th>
<th>L</th>
<th>XL</th>
<th>2XL</th>
<th>3XL</th>
<th>4XL</th>
</tr>
</thead>
<tbody>
<tr>
<td>REGULAR/TALL CHEST</td>
<td>32-34</td>
<td>35-37</td>
<td>38-40</td>
<td>41-43</td>
<td>44-46</td>
<td>47-49</td>
<td>50-53</td>
<td>54-57</td>
</tr>
<tr>
<td>REGULAR/TALL NECK</td>
<td>14 1/2-15</td>
<td>15-15 1/2</td>
<td>15 1/2-16</td>
<td>16-16 1/2</td>
<td>16 1/2-17</td>
<td>17-17 1/2</td>
<td>17 1/2-18</td>
<td>18-18 1/2</td>
</tr>
<tr>
<td>REGULAR LONG SLEEVE ARM LENGTH</td>
<td>30 1/2</td>
<td>32</td>
<td>34</td>
<td>35</td>
<td>36 1/2</td>
<td>37 1/2</td>
<td>38 1/2</td>
<td>39 1/2</td>
</tr>
<tr>
<td>TALL LONG SLEEVE ARM LENGTH</td>
<td></td>
<td></td>
<td></td>
<td>36 1/2</td>
<td>38</td>
<td>39</td>
<td>40</td>
<td>41</td>
</tr>
<tr>
<td>INSFAM</td>
<td>30</td>
<td>31</td>
<td>32</td>
<td>32 1/2</td>
<td>33</td>
<td>33 1/2</td>
<td>34</td>
<td>34</td>
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</table>

<table>
<thead>
<tr>
<th>YOUTH SIZES</th>
<th>XS</th>
<th>S</th>
<th>M</th>
<th>L</th>
<th>X</th>
</tr>
</thead>
<tbody>
<tr>
<td>SIZE</td>
<td>4</td>
<td>6/8</td>
<td>10/12</td>
<td>14/16</td>
<td>18/20</td>
</tr>
<tr>
<td>CHEST</td>
<td>25-26</td>
<td>26-28</td>
<td>28-30</td>
<td>30-32</td>
<td>32-34</td>
</tr>
<tr>
<td>WAIST</td>
<td>24-25</td>
<td>25-26</td>
<td>26-27</td>
<td>27-28</td>
<td>28-31</td>
</tr>
</tbody>
</table>
For the garment...

In general, exercise due care.

- Flammability of Wearing Apparel, 16 CFR 1610
- Fiber Identification Act
- Care Labeling Act
- Country of origin
- RN number
CPSIA focus

• Defines a child as 12 and younger
• Applies to:
  • Children’s products
  • Childcare articles
  • Children’s toys
CPSIA requirements

• Third party testing mandatory:
  • Lead in substrate
  • Lead in paint and surface coatings
  • Some phthalates

• Children’s Product Certificate mandatory

• Tracking labels mandatory

• Makes previously voluntary standards mandatory
Lead in substrate

Substrate is the material of which something is made, and to which surface coating (i.e. paint) may be applied

• 100 ppm lead as of August 14, 2011
Lead Paint Rule

Decorated or scrapable surface coatings

• 16 CFR 1303 in effect since 1978 at 600 ppm
• As of August 14, 2009, sets limit at 90 ppm
Phthalates

• **Applies only to children’s toys and child care products**
• For all such products, DEHP, DBP, BBP – limit of 0.1%
• For all such products or any part of the product that can be placed in a child’s mouth: DINP, DIDP, DnOP – limit of 0.1% (interim prohibition)
• Applies to accessible materials only (before and after use and abuse testing)
Children’s Product Certificate (CPC)

- **Importer or Domestic manufacturer** is responsible for testing and certification

- **All testing must be reflected** in Children’s Product Certificate (CPC) or General Conformity Certificate (GCC)

- Must be produced and made available for **every youth order**

- Sample certificates on the CPSC website
Children’s Product Certificate (CPC)

Sample Children’s Product Certificate (CPC) Format From CPSC
This is the information required by the CPSC. There is no standard format for providing this information.

CHILDREN’S PRODUCT CERTIFICATE

1. Identification of the product covered by this certificate
2. Citation to each CPSC product safety regulation to which this product is being certified
3. Identification of the U.S. importer or domestic manufacturer certifying compliance of the product
4. Contact information for the individual maintaining records of test results
5. Date and place where this product was manufactured
6. Date and place where this product was tested for compliance with the regulation cited above
7. Identification of any third-party laboratory on whose testing the certificate depends
Tracking Labels

• Required for all children’s products manufactured after August 14, 2009
• Enhance recall effectiveness
• Required information:
  • Manufacturer name
  • Month & year of manufacture
  • City & state of manufacture
  • Batch or internal order number (P.O. number)
  • Contact information (phone / email)
Tracking Labels

- Must be permanent
  - Hangtags and adhesive labels **not** acceptable
- Supplier should include tracking label information
- Depending on changes made to the supplier’s product, distributor may need to include additional tracking label markings
Tracking Labels

Create

Single Registration

* Create a Code: http://ps.ppa.org/

* Location of Production: city, state, country, factory (example: Irving, TX-Factory 5)

* Date of Production: format MM/DD/YYYY (example: 01/27/2015)

* Identifying Characteristics: batch, run number, sources (example: BL-123 Bounce Ball)

* Contact Information: phone, email, etc (example: 888-426-7724, product.safety@ppai.org)

By clicking submit you accept the terms of use

Submit
Tracking Labels

• Example using the PPAI tracking label system:
  ps.ppa.org/SAMPLE003
Promotional Products Association International
Not just lead, phthalates too

But not for everything...for apparel, think apparel intended for ages three and under, sleepwear, baby blankets, sleep mats, bibs and more
Specific Examples

Likely to be found in decoration or attachments such as Velcro, vinyl, zippers, buttons, clasps, and rhinestones.
Decorating Process

• You have undecorated youth size garments and intend to apply an imprint to them. What are your responsibilities?
  • If you are a distributor and you buy a finished garment from a supplier, that supplier is responsible for ensuring compliance. You are only responsible for exercising due care.
  • If you are making a material change to a finished product, you are now considered a manufacturer and must comply with all CPSIA regulations as they relate to the imprint.
Decorating Process

- To summarize, you don’t have to change anything as it relates to decorating adult size garments.
- You must change how you handle the youth size garment decoration process.
- How do you go about identifying a decorator that can handle youth size garment decorations?
Compliance obligations by decorating method

• Compliance obligations vary by imprinting method.
  • Screenprinting
    • Test reports
    • Ink management
    • Paperwork
    • Tracking labels
CPSIA, Section 101 - Lead Paint Rule

• Applicable if the ink can be scraped off the garment
• 90ppm limit
• TESTING REQUIRED
Secondary Tracking Label

When a distributor sources from an apparel distributor, contracts with a third-party decorator to apply ink or thread to a garment, and sells the product, the garment has been altered and requires a second tracking label for the same purpose as the first...

- A secondary tracking label is still required for embroidered items even though most embroidery threads are exempt from testing.
Secondary Tracking Label

Required Information:
- Distributor’s (Decorator’s) name
- Month & year decoration was applied
- City & state where decoration was applied
- Decorator’s batch or internal order number
- Distributor’s contact information
Create

Single Registration

* Create a Code [http://ps.ppa.org/]

* Location of Production

* Date of Production

* Identifying Characteristics

* Contact Information

By clicking submit you accept the terms of use.

Submit
Tracking Labels

Example using the PPAI tracking label system:
ps.ppa.org/SAMPLE003

Promotional Products Association International
Secondary Tracking Label Best Practices

- Permanent Tracking Labels
  - Mandatory for all children’s products
  - Can be incorporated into the decoration if done at different time or by a different vendor
PROOF APPROVAL AUTHORIZATION

CUSTOMER NAME: Databar Inc

JOB NAME: Santa Runs 15

APPROVAL CONFIRMATION NEEDS TO BE RECEIVED VIA EMAIL OR FAXED TO SHIP DATE OF MAY BE DELAYED:

FULL FRONT
- Tape off Bud Light Logo on Youth Shirts
- Tape off Tracking Label on Adult Shirts

Upper Back
- approx. 10"
- approx. 4.5"

FLEET FEET Sports

Online Proofing: Purpose is to show color and color breaks, however it is not an exact color matching system. We cannot match what is out-put from printersonor viewed on individual monitors. Please use PMS coated color matching system as a guide. Coated means "C" after the PMS color. WE DO NOT USE UNCOATED PMS COLORS! Distance between collar seam and topmost part of DESIGN WILL BE PLACED ACCORDING TO OUR STANDARDS UNLESS OTHERWISE INSTRUCTED.

PO#: 32953
SO#: 40905

January 10-14, 2016 • Mandalay Bay Convention Center, Las Vegas
Screenprinting
What about bling?

Any hard attachments?
- Both lead limits apply to the decoration
- Use and abuse testing for attachments is recommended (small parts, sharp points, sharp edges)

Ask yourself – are you now the manufacturer? Are you making a material change to the product?
What about embroidery?

What are the considerations for embroidering children’s garments and/or child care items?
What about digital printing?

What are the considerations for applying a digital printing process children’s garments and / or child care items?
What about printed transfers?

What are the considerations for applying printed transfers to children’s garments and / or child care items?
What about other decorating methods?

- What are some decorating methods that would not necessarily require third party testing?
  - Appliqués or reverse appliqués
  - Debossing
  - Embossing
  - Flocked transfer
  - Heat transfer
  - Laser appliqué
  - Laser etching
  - Sublimation
Regardless of decorating method

- In all cases, a secondary tracking label is required
What can you do?

• No need to change how you handle adult garment decorations
• Work with a screen printer who has tested all inks for children’s garments
• Rely on ink suppliers’ tests and component testing rule to create the secondary CPC
• Perform third-party tests on finished product to support the secondary CPC
• Make sure a secondary tracking label is affixed to the product
• Look for PPAI best practices
Drawstrings

Short answer...no drawstrings in children’s upper outerwear

• Hood, neck and waist drawstrings on children's upper outerwear presents a substantial strangulation hazard (sizes 2T to 12 or equivalent)
November 10, 2015 Recall

Hazard: Drawstrings pose strangulation hazard
October 29, 2015 Recall

Hazard: Drawstrings pose strangulation hazard
October 20, 2015 Recall

Hazard: The zipper pull can detach, posing a choking hazard to young children
August 6, 2015 Recall

Hazard: The snaps on the one-piece garment can detach posing a choking hazard to young children.
March 4, 2015 Recall

Hazard: The pajamas fail to meet federal flammability standards for children’s sleepwear, posing a risk of burn injuries to children.
Recall Risk for Apparel

• Managed by the CPSC
  • Failure to meet federal flammability standards for children’s sleepwear
  • Strangulation in case of drawstring around neck or waist area
  • Lack of conformity with CPSIA
Violations

October –November 2015

• **112 Letters of Advice (LOA) for violation of a mandatory standard**
  • **38 tracking label violation**
  • 17 lead in children’s product
  • 15 related to VGB Act for pools and spas
  • **12 third party certificate violation**
  • 9 small parts violation
  • 8 bicycle helmet labeling
  • 5 art materials labeling
  • **4 sleepwear labeling or flammability failure**
  • 1 exceeds phthalate interim ban limit
  • 1 fireworks short fuse burn time
  • 1 iron containing dietary supplements packaging
  • 1 mattress flammability failure
Product Safety Resources

• PPAI: [www.ppai.org](http://www.ppai.org)

• Product Safety powered by PPAI: [http://www.ppai.org/productsafety](http://www.ppai.org/productsafety)


• Questions? [AnneL@ppai.org](mailto:AnneL@ppai.org) or [TimB@ppai.org](mailto:TimB@ppai.org)

• Twitter: [@PromoSafetyGuy](https://twitter.com/@PromoSafetyGuy)