

# Joint Action 2012 GPSD

Joint Market Surveillance Action co-funded by the European Union  
Agreement No: 2012 82 01

## Final Technical Report, Cords and Drawstrings

Covering the period 1 January 2013 - 30 April 2015



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## Disclaimer

This report arises from the Joint Market Surveillance Action on GPSD Products - JA2012, which received funding from the European Union in the framework of the 'Programme of Community Action in the field of Consumer Policy (2007-2013)'.

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## Executive Summary

This report presents the activities undertaken and the results achieved in the Cords and Drawstrings Activity of “Joint Market Surveillance Action on GPSD Products - JA2012” supported financially by the European Union under Grant Agreement No. 2012 82 01.

The Activity was carried out by PROSAFE and 8 market surveillance authorities from 7 Member States (Cyprus, Estonia, Greece, Ireland, the Netherlands, Portugal, Spain). Furthermore, Iceland, participated in the Joint Action as collaborating partners outside the financial scheme.

The Activity regards market surveillance in the field of children clothing. Cords and drawstrings on clothes can be very risky to children and this joint action is for that reason a follow up from an earlier Cords and Drawstrings Activity (2008-2010). The Activity addresses cords and drawstrings in clothes for the age groups ‘small children (<7 year)’ and ‘older children and young persons (7-14 years)’.

Much effort is given to the instruction of the inspectors who carried out the conformity checks on clothing themselves. They had to check the safety requirements from the relevant standard EN 14682:2007. Moreover, worst case scenarios with risk assessment were elaborated and appropriate checklists with guidelines drawn up.

A total of 1895 inspection visits have been undertaken at economic operators where 10981 garment models were checked ‘on the spot’. Among them 790 garments were found noncompliant, leading to a ‘non-compliance level of 7,2 %. The earlier Cords and Drawstring Activity (2008-2010) showed a ‘non-compliance level of 13,4 % (based on 16381 garment models checked). This decrease of 6,2 % prudently may be seen as a growing awareness over the recent years upon the safety requirements in children clothing in the trading chain.

The ‘Head and Neck’ area and the ‘Waist, Chest and Back’ area both played a dominant role in the worst case scenarios of the Risk Assessments. The huge share of non-conformities (85 % together) in these two areas, as appears from the inspection results, justified a two way approach in enforcement:

- High- and medium risks: focus on ‘Head & Neck’ and ‘Waist & Back’ nonconformities (85 % non-conformity share) with conscientious application of formal tools on these categories and
- Low risk: providing room for voluntary measures in the remaining categories (15% non-conformity share).

Serious risks however were not appointed in the worst cases risk scenarios developed. So, due to this Activity no RAPEX notification (art12 GPSD) has been send off.

The ‘Head and Neck area’, with an overall non-compliance share for both the young and older children had the highest non-compliance share (57%). Nevertheless, this share means a decrease with 6 % over the recent years since the previous Cords and Drawstring Activity and seems to be a welcome progress in safe clothing on the market, in particular for the younger child.

Regarding application of enforcement tools by the Market Surveillance Authority, the dominance of the more severe tools, like sale bans, recalls and withdrawals from the market, was found mainly at the EU importers and distributors.

The most frequent visited retailers appeared very willing to cooperate with inspectors through voluntary measures in bringing clothing into conformity by mending clothing in their storage e.g. by removing or shortening cords, drawstrings, straps, stirrups, sashes etc. or by other simple adjustment- or stitch work on clothing. At the retailers 88 % of the garment models appeared either direct OK or after mending.

Future focus should therefore primary be laid on the EU importers and distributors situated higher up in the trading chain.

## Introduction

This is the final technical report prepared for the Cords and Drawstrings Activity II of the Joint Market Surveillance Action on GPSD Products - JA2012. The Joint Action received funding from the European Union in the framework of the 'Programme of Community action in the field of Consumer policy (2007-2013)'. Market surveillance Authorities of participating Member States cooperated in drawing up and executing the Activity and provided an Activity Leader. The Activity Coordinator was a PROSAFE consultant.

It is important to mention that Cords and Drawstrings Activity II followed up a previous one from 2008. No laboratory for testing has been foreseen. Officials themselves were instructed to undertake the testing by checking cords and drawstring attributes on children's clothing on the spot.

In Chapter 1 the report deals with background information like objectives, budget matters, the phases and timeline throughout the Activity. Chapter 2 deals with setting up the Activity such as checklist, guiding and risk assessment; core parts are the execution of the inspection visits, the results attained and their follow up with enforcement activities and lastly the Activity conclusions. Chapter 3 - Liaisons - regards the involvement of customs and other parties. Chapter 4 gives room to evaluation of the Activity while Chapter 5 ends with the bibliography of cited formal documents.

Annex 1 resumes the deliverables mentioned throughout the report, annex 2 reports the minutes of the three project meetings to illustrate the process, annex 3 shows the checklist applied, annex 4 - the guideline to the checklist, annex 5 - the facilitating picture guiding and annex 6 - the quarterly reporting form which template is also used to gather the final inspection data.

# 1 Background Information

This chapter presents a short extract of the project description. The full description can be found in the Grant Agreement [1].

## 1.1 Title of the Activity

Cords and Drawstrings Activity II

The Activity was part of Joint Market Surveillance Action on GPSD Products - JA2012

The European Commission supported the Joint Action financially under Grant Agreement No. 2012 82 01.

## 1.2 Participating Member States

The Activity was undertaken by PROSAFE and 8 market surveillance authorities from 7 Member States (Cyprus, Estonia, Greece, Ireland, the Netherlands, Portugal and Spain). Furthermore, Iceland participated in the Joint Action as collaborating partner outside the financial scheme.

The applicant body that also took overall responsibility for the Joint Action was PROSAFE.

## 1.3 Overview of Key Staff in the Activity

The Activity Leader was Corine Postma, Dutch Food and Consumer Product Safety Authority.

The Activity Leader was supported by the PROSAFE consultant Berend Kamerling.

## 1.4 Objectives

The general objective of the Joint Action is to continue to create the conditions whereby Member States can cooperate successfully on market surveillance activities and to co-ordinate a number of product-specific market surveillance activities exposing the results of the work to the largest number of national authorities possible. Moreover, the primary focus of the Activity is to develop best practices and exchange experience with carrying out market surveillance activities.

Secondary objectives of the Cords and Drawstrings II Activity will be:

- To help to ensure that children's clothing placed on the EU market are safe with regard to cords and drawstrings;
- To follow-up the previous Joint Action on Cords and Drawstrings I from 2008 in order to see if the safety has improved;
- To further share and develop the tools and best practices that were developed in the previous Joint Action;
- To gain experience with following-up a market surveillance activity which will be especially important in light of the movement towards establishing a multi-annual European level market surveillance programme.

## 1.5 The Volume of the Activity

The total budget for this Activity has been €149.260, of which the Commission funded 65,31% equivalent to €97.479. The participating seven Member States supplied 40 days each, which amounted to 280 days. With a similar contribution of Iceland, participating outside of the financial scheme, this will count on to 320 days in total. The Activity is to be seen as a 'smaller scale' follow-up of the previous granted Joint Action from 2008 which was budgeted for 210,942 euro. The Activity restricts to market surveillance activities through inspection visits without laboratory tests and without broader market studies.

## 1.6 The Phases of the Activity

The Activity has gone through the phases in table 1:

First phase: 2013  Sept. (M9) - Dec. (M12)	Start-up activities: <ul style="list-style-type: none"><li>• Kick-off meeting, establishing the project plan and detailed objectives and activities.</li><li>• Inventory national markets upon children clothing with cords and drawstrings.</li><li>• Deciding on sampling criteria,</li><li>• Development drafts for checklist, guidelines, Risk Assessments and reporting form.</li></ul>
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Second phase: 2014  Jan.(M13) - Oct.(M22)	Market surveillance activities: <ul style="list-style-type: none"> <li>• Second project meeting and instruction session to prepare the inspection visits.</li> <li>• Deciding on, and sharing of checklist, guidelines and reporting form to apply.</li> <li>• Deciding on, and sharing of Risk Assessments on worst case scenarios chosen.</li> <li>• Market surveillance through inspection visits.</li> <li>• Measures taken against dangerous products found on the market during inspections.</li> <li>• Third project meeting to gather and discuss inspection results and tools applied.</li> </ul>
Third phase: 2014/2015 Nov.(M23) - Feb.(M26)	Dissemination of results, finalisation of the best practices. <ul style="list-style-type: none"> <li>• The final report (this report) has been written; deliverables (listed in annex 1) to admit to Chafea and to insert into the final implementation report JA2012.</li> <li>• Presentation of the results at the final conference of JA2012 in February 2015.</li> </ul>

Table 1: Phases of the Cords and Drawstrings Activity JA2012

## 1.7 Timeline for the Activity

The Activity started with a first ‘kick-off’ meeting at the end of September 2013 to discuss the layout of the Activity and to inform stakeholders. Two other meetings followed during the second phase to organise the activities and to share experiences and drafted tools. The meeting minutes formed the deliverables D5.2CD, D6.1CD and D6.2CD and have been annexed in this report to provide an impression upon the process gone through (Please see annex 2). Table 2 gives the meeting and reporting data.

Date	Meeting or reporting deadline
22 April 2013	Launch of Joint Action 2012 with Cords and Drawstrings amongst its Activities. Start of reporting period for the interim technical implementation report.
12 September 2013	Kick-off and planning meeting (first project meeting).
16+17 January 2014	Second project meeting, including an instruction day (2 <sup>nd</sup> day),
31 January 2014	Interim implementation report covering the period until 31 January 2014.
3 July 2014	Third project meeting.
31 August 2014	Second progress report covering the period from 1 February 2014 to 31 August 2014.
31 December 2014	End of reporting period, final technical report.
11 February 2015	Final conference Joint Action 2012.

Table 2: meeting data and/or reporting deadlines

The timeline for the Activity with the sequence of the main activities is given below:

- Inventory national markets  
Desktop research on the national markets regarding the involved economic operators for children clothing has been undertaken bearing in mind the home authority principle along the trading chain. Usual- and the fashionable cords and drawstrings applications were investigated among the variety of garment models found; nonconformity was identified in the sampled garments and information about it was shared.
- Deciding on sampling criteria  
Leading for the sample criteria has been the application form of ‘Grant Agreement No. 2012 82 01’ [1] which addresses cords and drawstrings in clothes for small children (0-7 years), bigger children (7-14 years) and disguise costumes for children, apparently referring to the scope of standard EN 14682:2007 [4]. A common ‘sample identification code’ has been agreed to identify nonconformity items.
- Visit preparations  
Checklist, guidelines and reporting forms to apply have been set-up, discussed and shared among participants, all based on the EN 14682:2007 requirements.

- Risk assessment  
The participants developed and applied a common approach following the RAPEX risk assessment guideline [3], in particular focussed on worst case scenarios regarding cords and drawstrings on children clothing.
- Sample and check products  
Market surveillance authority officials have visited manufacturers, importers, wholesalers and retailers to check garment models on the spot. These checking activities were carried out by the officials themselves after thorough expert instructions. No laboratory tests were foreseen. The checking activities were coordinated, gathered and reported back to the Activity Coordinator.
- Follow-up on noncompliant products and exchange of information  
The Member State authorities followed up towards the economic operators in their countries as follows: they consulted the economic operators on the results from the risk assessment, agreed on appropriate measures and pursued proper implementation. The resulting measures were reported to the Joint Action and shared among all participants.
- Result gathering and exchange.
- Reporting and presenting the results.

## 2 Market Surveillance Activities

### 2.1 Set-up checklist and guideline development activities

The market surveillance phase (second phase), covering the first three quarters of 2014, started with the development of appropriate tools to facilitate inspectors in their inspection task. A checklist has been set up with guidelines and pictograms. Three aspects appeared very helpful in this set up:

- a. A checklist and flowchart with guiding pictures and illustrations developed earlier under Cords and Drawstrings I (2008-2010),
- b. The instruction session upon the standard requirements, given by an external expert in textile testing on the first day of the January meeting which was illustrated by example clothing brought along by the expert for this purpose,
- c. The possibility to discuss with the expert the problems the participants have encountered during their market inventory including the related ‘problem’ samples they had brought along too.

Inspectors had to fill in the checklist for each inspection visit. Checklist, guideline and pictograms are the main parts of deliverable D8.2CD. Checklist, guideline to the checklist and pictogram guiding are annex 3, 4 and 5 to this report.

The applied checklist items have been derived from the clauses in standard EN 14682:2007 ‘Safety of children’s clothing - Cords and drawstrings on children’s clothing - Specifications’ [4].

Commission’s Decision 2011/196/EU [5] states the compliance of the standard clauses with the general safety requirement of the General Product Safety Directive 2001/95/EU [2].

The nonconformities concerning cords and drawstrings in children clothing are categorised as follows:

- |               |   |
|---------------|---|
| Cat. 3.2      | Hood and neck area on garments for young children (0-7 years),                    |
| Cat. 3.3      | Hood and neck area on garments for older children and young persons (7-14 years), |
| Cat. 3.4+3.6  | Waist area of garments, internal and external to the garment + Back area,         |
| Cat. 3.5+3.7  | Lower hems of garments which hang below the crotch + Sleeves,                     |
| Cat. 3.1      | General,  |
| Cat. ‘others’ | Other parts of the garment.   |



Deliverable D7CD ‘Means of exchange of information’ introduced a comprehensive ‘fill in’ form for the quarterly reporting activities to the Activity Coordinator (see annex 6 to this report). Content:

1. Number of inspections split up to the different economic operators visited,
2. Number of garment models checked,
3. Statistics on (quarterly) totals of non-conformities found included the splitting up in the six categories.

All the checklists gathered, firstly, among the executing Member State inspectors and, secondly, among the participating Member States, provided the final feed into an overall table of the same format.

## 2.2 Set-up Risk Assessment development activities

The participants developed a common approach to the application of the RAPEX risk assessment guideline [3], in particular worst case scenarios regarding cords and drawstrings on children clothing to assure that the resulting assessments were harmonised to the highest extent possible. The Member States then assessed the risks applying the agreed approach and any relevant national conditions. The PROSAFE Risk Assessment Activity (RAA) provided support in dealing with scenario choices and probability estimations. The group elaborated four worst case scenarios. These were confirmed as such by the RAA.

The risk assessments have shown only high and medium risks; no serious risk was present regardless of the body area concerned. As a consequence, this Activity has sent no RAPEX notifications art 12 GPSD to the Commission.

## 2.3 Execution of inspection visits

Figure 1 presents the quarterly number of inspection visits with Cords and Drawstrings checks on children clothing. The quarterly numbers of 630 (QI), 697 (QII) and 562 (QIII) provided a total of 1.889 inspection visits. During those 1.895 visits, 10.981 garment models have been checked which means that in average during an inspection visit almost 6 (5,8) different garment models have been investigated ‘on spot’ regarding the presence of noncompliance.

Despite the different timing in the planning of inspection visits in the Member States during the three quarters of the market surveillance phase, a rather equal average of around 600 visits could be made. Conspicuous is the large share (93%) of visits (1.748) to retailers. An explanation is that retail shops represent the market in the most visible public manifestation and offer inspectors at the same time an ideal occasion to overview the recent range of (fashionable) garment models with cords and drawstring attributes. Moreover it provides (new) addresses of distributors and importers to visit higher up in the trading chain.

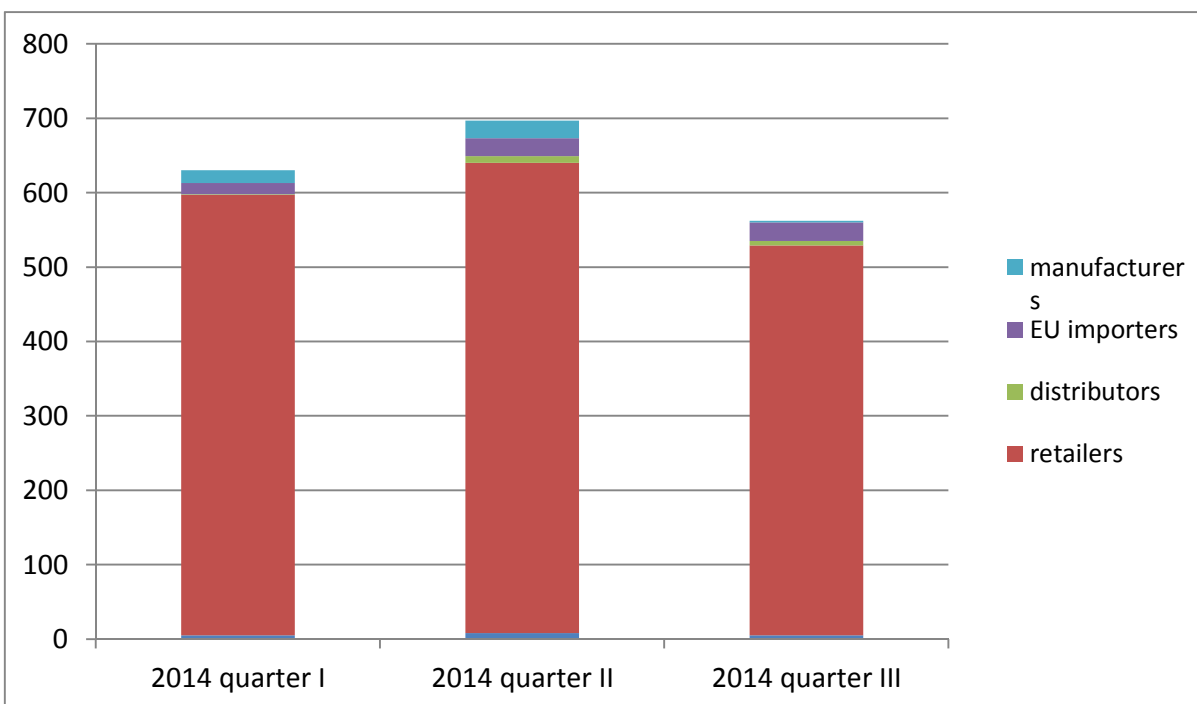


Figure 1: Total quarterly numbers and distribution of inspection visits Cords & Drawstrings.

## 2.4 Results of inspection visits

Within the three quarters of the market surveillance phase, 10.981 garment models have been checked. The inspections showed that 790 of these did not comply with the safety requirements. The numbers are shown in table 2. From the total, one could derive a share of noncompliance of 7,2 % (in Cords and Drawstrings I defined as ‘noncompliance level’). The Cords and Drawstring Activity I (2008-2010) with 16.381 garment models checked, mentioned a non compliance level of 13,4 %. So one could prudently claim that this decrease in noncompliance level with 6,2 % represents a growing safety awareness upon cords and drawstrings safety requirements over the recent years.

	Q I	Q II	Q III	Total
Number of inspection visits	630	697	568	1895
Number of garment models checked	3641	4344	2996	10981 (100%)
Number of noncompliant garment models	245	267	278	790 (7,2%)

Table 3: The table shows the share of noncompliant garments models related to the checked ones.

Note:

One should be careful with definitions: a single garment model checked could have more types of nonconformity. In this Activity this appeared to be 1,19 in average. This correction leads towards 940 nonconformities in the checked 790 noncompliant garment models. However this may not conclude to a proportional increase of the ‘noncompliance level’.

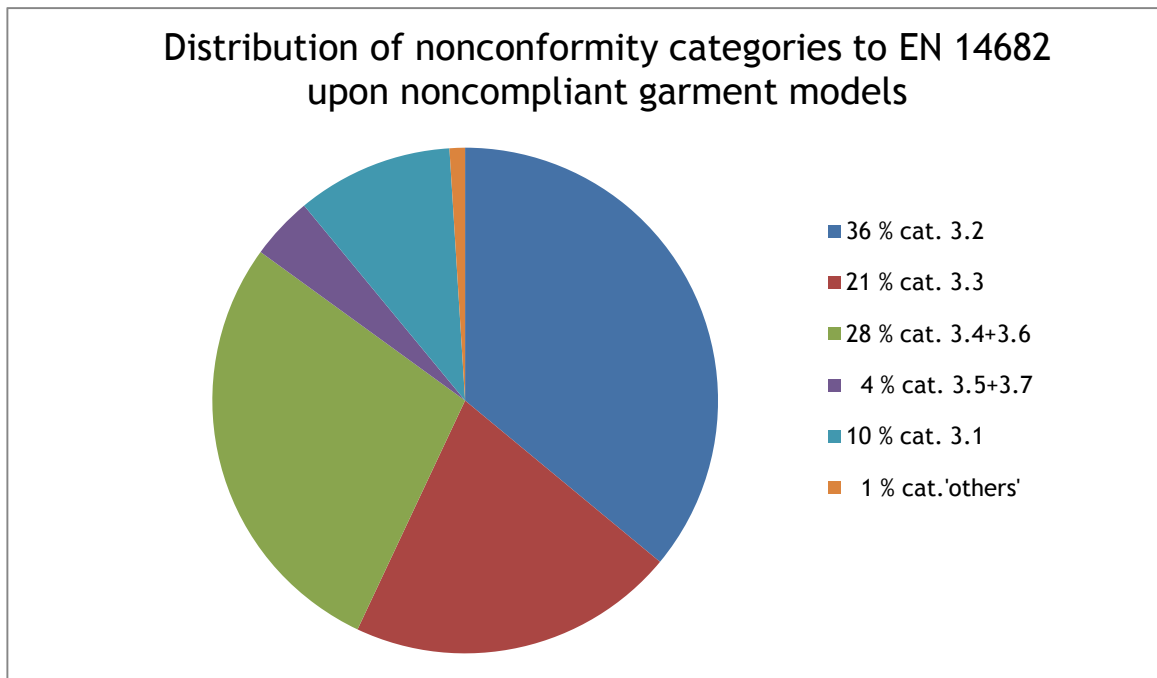


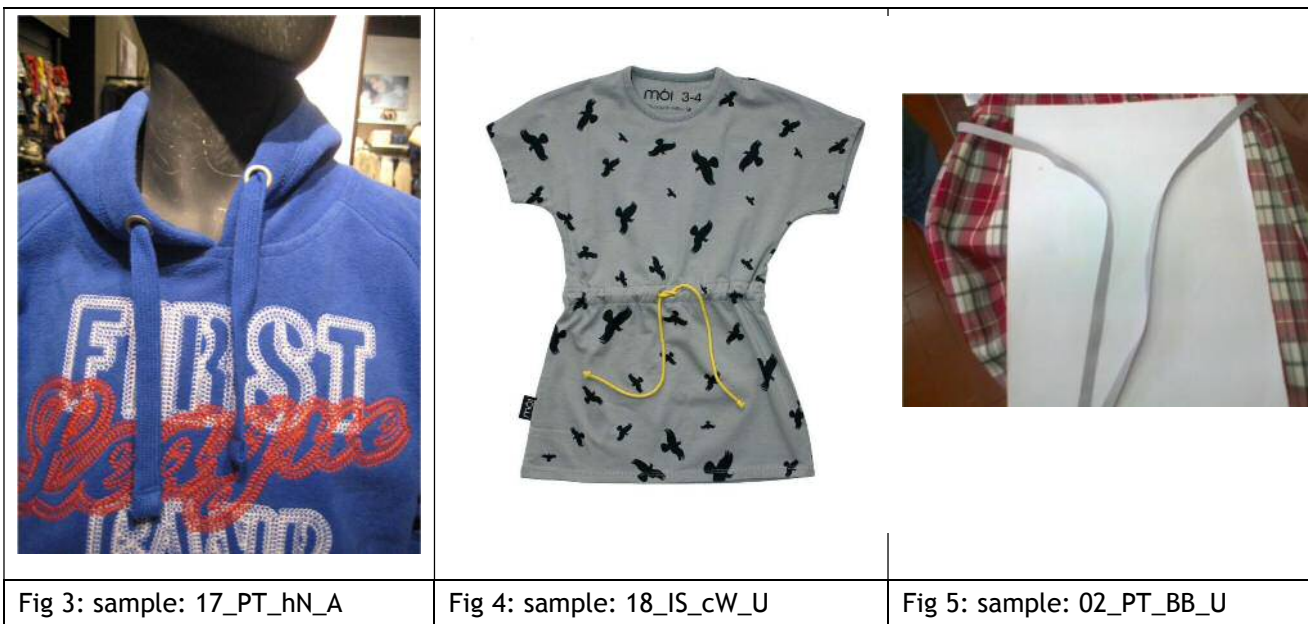
Figure 2: Distribution of nonconformity categories to EN14682 upon noncompliant garment models

To get an impression:

Figure 3 shows a typical example of nonconformity in ‘the hood and neck area’: a sweater with a draw cord in the hood which is too long (young person);

Figure 4 shows a typical example of nonconformity in the ‘waist area’: draw string too long (young child);

Figure 5 shows, in the back area, a too long garment drawstring which is to be tied at the back.



N.B. The subscripts in the three figures 3, 4, 5 are ‘sample identification codes’ with abbreviations as defined in the 2nd Cords and Drawstrings meeting, to facilitate mutual communication.

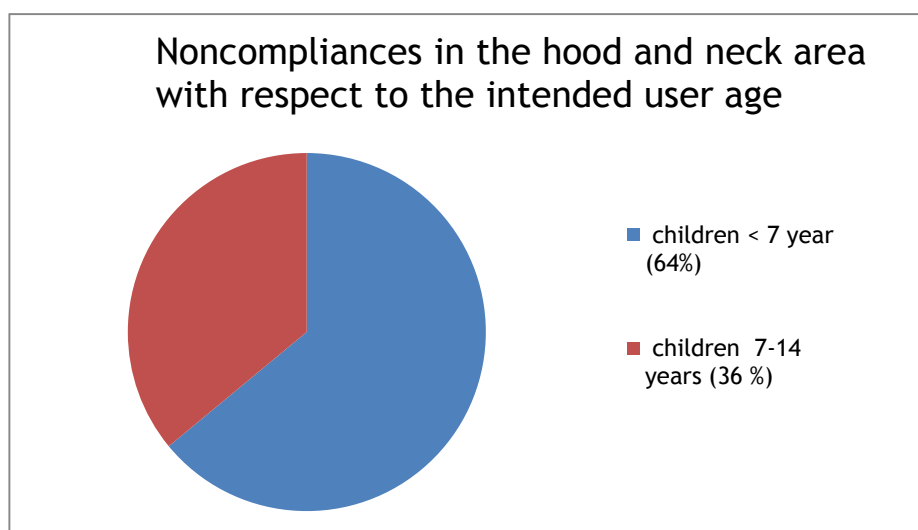


Figure 6: Noncompliance in the hood and neck area with respect to age of the user

Figure 6 above shows the separated ‘Hood and Neck area’, the area with the highest noncompliance level, as in standard EN 14682:2007 distinguishes in two categories according to the ages of the user: (1) young children (<7 year) and (2) older children and young persons (7-14 year). The ‘noncompliance shares’ between the two age groups are compared respectively in Cords and Drawstring I and II in table 3.

	Noncompliance share both categories together	Share cat.3.2 (<7yr) young children	Share cat.3.3 (7-14 yr) older children & young persons
Cords and Drawstrings I	63 %	43 %	20 %
Cords and Drawstrings II	57 %	36 %	21 %

Table 4: Comparison Cords and Drawstring I and II upon hood and neck area noncompliance

One may conclude from table 4, that the overall noncompliance share for the hood and neck area has decreased with 6% over the recent years and even 7% for the most vulnerable category, young children.

**Caution!**

The above results are based on products that were sampled from the markets in the participating countries by experienced market surveillance inspectors that were looking for noncompliant and potentially unsafe products. As in any routine market surveillance activity, the results represent the targeted efforts that authorities undertake to identify unsafe products. They do not give a statistically valid picture of the market situation.

The samples were tested/checked by the market surveillance inspectors themselves. The tests/checks focused on those safety requirements that have the largest impact on consumer safety.

**2.5 Enforcement activities undertaken**

As mentioned in chapter 4.2, risk assessment showed that only high- and medium risks could be related to the chosen worst case scenarios. No Risk Assessment in worst case scenarios, in whatever body area, led to the result: serious risk. As a consequence no RAPEX notifications were send off due to this activity. However the ‘Head and Neck’ area and the ‘Waist, Chest and Back’ area both played a dominant role in the worst case scenarios. The huge share of nonconformities (85% together) in this field, as appears from the inspection results in figure 2, justified the two way approach in enforcement:

- High- and medium risk: focus on ‘Head & Neck’ and ‘Waist & Back’ nonconformities (85% nonconformity share) with conscientious application of formal tools on these categories and
- Low risk: providing room for voluntary measures in the remaining categories (15% nonconformity share).

So, economic operators which put noncompliant garments on, or made available to the market, either encountered Authority’s enforcement tools or took, under Authority’s Surveillance, measures to bring clothing into conformity by mending e.g. by removing or shortening cords, drawstrings, straps, stirrups, sashes etc. or by other simple adjustment- or stitch work on clothing. Table 6 gives the variety of Authority actions and their abbreviations as used in table 4. Participants consulted for tool application the Prosafe book with ‘Best Practices in Market Surveillance’ chapter 8 [7].

TA: Tools Applied	Explanation of the abbreviation
OK	OK, product compliant or low risk estimation (no tools applied)
OW	Official Warning
AC	Alert to consumers
SB	Sales Ban
WV	Withdrawal Voluntary
WC	Withdrawal Compulsory
RC	Recall from Consumers
MO	Measures Otherwise (under Authority’s Surveillance)

Table 5: Explanation of the abbreviations of applied enforcement tools

Tools applied to:	all MS's visits	OK	TA	OW	AC	SB	WV	WC	RC	MO
		%	%	%	%	%	%	%	%	%
	1895	82	18	2	1	1	5	3	1	4
. manufacturers	43	89	11	5	0	0	0	2	2	2
. EU-importers	64	19	81	5	11	11	47	2	2	2
. distributors	16	46	54	3	0	16	19	0	13	0
. retailers	1748	88	12	2	0	0	2	4	0	3
. containers	24	0	100	0	0	0	0	0	0	100

Table 6: all tools applied to economic operators and their % distribution

### Notes to table 6:

*The OK and MO scores and shares mixed up a little. In special at retailers (most visits) a small mending, shortening or removing cords or drawstrings on the clothes models displayed could have been registered as OK or even not registered. On the contrary, an OK could be seen, for the same reason, as a measure otherwise (MO).*

Analysis of the data in table 6 could lead to a number of notes:

- 1) Overall: upon 82% of garment models no formal tools were applied (OK); on 18% of them formal tools were applied, where the distribution shows predominance for the both types of withdrawal, the voluntary and the compulsory.
- 2) The even 89% OK for the national manufactures could be due to knowledge upon consumer protection regulations developed over time and possibly earlier experiences. Predominance of the official warning (OW). Readiness to adapt immediately the model(s) under design or production could also have led to an OK score in the minor nonconformities.
- 3) The high 88% garment models OK for the so frequent visited retailers may be partly explained by the same reason (as under 2) and partly by the easy way of bringing garments into compliance, a cooperative behaviour after the advice of an inspector. The restricted numbers in display or storage of a few couple of garment models makes such an option realistic for retailers. Such practical 'hands on' behaviour did not always lead to formal tool application by the officials. See also the 'note to table 3'.
- 4) The 0% OK for containers has a deviating meaning, namely that in each of the 18 containers, a couple of noncompliant garment models were found. Moreover, the container score with 100% 'measures otherwise' (MO) illustrated the appropriate voluntary measures taken to bring clothes into conformity by mending them. The EU-importers, called up by the officials, act at such circumstances under the surveillance of officials and were getting informed on this specific regulation at the same occasion.
- 5) The application of withdrawals from the market (19/47 %), sales ban to stop the supply chain (16/11 %) and recalls (13 %/2 %) dominated at the distributors /resp. EU importers involved.

## 2.6 Conclusions

Throughout this Activity of 1895 inspection visits to economic operators, 10.981 garment models of children clothing have been checked. A total of 790 garment models appeared to be noncompliant. (with 940 nonconformities on cords and drawstring items). This shows that the inspectors were able to identify noncompliant children clothing on cords and drawstring items without laboratory testing costs to spend.

One could prudently claim that the 6,2% decrease in noncompliance level in this Activity represents a growing safety awareness upon cords and drawstrings safety requirements over the recent years since the first Cords and Drawstrings Activity (2008-2010).

Cords and drawstrings in 'the Hood and Neck area' of children clothing still performed the highest noncompliance share (57%) consisting of the two categories according to the ages of the user: (1) 36% for young children under 7 years and (2) 21% for older children and young persons of 7 to 14 years.

Related to the first Cords and Drawstrings Activity (2008-2010) the noncompliance level decreased with 6% and for young children even 7%.

Within the tools applied by market surveillance officials, some 80% pointed to 'no need for' (either OK, compliant or conformities mendable under surveillance, the latter option is found specific under the large group of retailers). 20% were applied towards the well known variety of tools drawn up in sequence of frequency: voluntary withdrawal, measures otherwise, compulsory withdrawal, official warning, sales ban/recall and alert.

Risk Assessments of worst case scenarios, set up in this Activity, did not point out serious risks leading to art 12 RAPEX notifications. Still the market surveillance authorities had to impose measures to remove the remaining risky garment models from the national markets. It was very positive to see that the cooperation with most of the economic operators went very smoothly and that most of the measures were actually voluntary measures taken by the economic operators.

The heaviest enforcement tools have been applied towards the rather limited visited groups EU importers and distributors (3,4 % resp. 0,8 % of the total visit number).

## 3 Liaisons

### 3.1 Involvement of Customs

The liaison between customs and the Activity was limited to the Spanish border control. Seventeen regional inspectors from the Spanish market surveillance Authority, working separately from customs officials in all eight Spanish harbours, carried out border control upon 5185 containers - loaded with children clothing (with and without cords and drawstrings). The other member states did not perform container checks. It is a very difficult task to investigate exclusively children clothing in containers on the spot (fully loaded with all kind of clothes and textiles). There is no special code for children's clothes, thus selection is very difficult.

However, the clear activity checklist and guideline developed, appeared to be applicable in harbour circumstances. In 24 containers from the imported freight in the Spanish harbours noncompliance was found. It appeared possible to detect one or two noncompliant garment models in each of the 24 containers checked. An advantage of the collaboration with customs has been that it consequently provided a direct contact with the related EU importers, which in turn have taken appropriate measures in all cases. The results of these interventions have been incorporated in the chapter 2.4 data. The Spanish experience has been useful but stressed the need for an early preparation in approach and planning of the collaboration.

### 3.2 Other Liaisons

The Cords and Drawstrings Activity maintained close links with the convenor of WG20 within CEN/TC 248 "Textiles and textile products" which has been dealing with revising the current standard in response to European Commissions Mandate M309. The Spanish participant is also member of WG20. At the Kick-off meeting, the convenor has explained the current application and future standard developments through document CEN/TR 16446:2012 - the guidance on the use of EN 14682:2007. She also organised an instruction day for the participants.

Representatives of Commission (DG JUSTICE), European consumer organisation (ANEC), standard organisation (CEN-CENELEC) and European textile and clothing industry confederation (EURATEX) showed their interests and involvement by attending the "Kick-off" meeting.

The Commission representative participated even in all of the Activity meetings.

## 4 Evaluation, Lessons Learned

It appeared possible to instruct inspectors in a short session to prepare them in executing the assessment of a variety of (fashionable) children clothing by recognising and identifying noncompliance. They, however, have to be well defined in the standard and the standard is made operational through checklist and guidelines.

Under the condition just mentioned, external testing costs could be saved and time consuming procedures to contract an accredited specialised laboratory could be avoided.

Training inspectors, in various case scenarios with risk assessments, appeared to be very useful for attaining a harmonised surveillance approach. Support and case judgment of an operational Risk Assessment Group working in the same period in the JA2012 programme was a fortunate coincidence and much appreciated.

Customs collaboration has been realised in only one country; for wider participation an earlier arrangement is necessary. In this Activity the checklist with guideline developed for inspectors seemed also to be suitable for customs officials.

Most inspection visits have been done at retailer shops where children clothing is visually displayed to the public. The willingness of retailers to mend and adapt the stored (small) quantities of noncompliant models appeared to be high. However, only a few visits to the 'less visible' EU importers and distributors were paid. These economic operators should deserve more inspection focus because they end up higher in the trading chain, where intervention has much more impact. Desktop research to find relevant addresses (websites) and more source finding through (obligated) assistance of the visited retailers with noncompliant clothes, could be successful.

## 5 Bibliography

All quotes and references in the text are stated with a number in brackets, e.g. [1]. The full list of references is given below.

1. Grant Agreement for an Action - Cords and Drawstrings, Agreement Number 2012 82 01". Grant Agreement 2012 82 01 - GPSD JA2012.
2. Directive 2001/95/EC of the European Parliament and of the Council of 3 December 2001 on general product safety (L 11/4, Official Journal of the European Communities 15.1.2002).
3. Commission Decision 2010/15/EU of 16 December 2009 laying down guidelines for the management of the Community Rapid Information System 'RAPEX' established under Article 12 and of the notification procedure established under Article 11 of Directive 2001/95/EC (the General Product Safety Directive). Published in the Official Journal of the European Union L22/1.
4. EN 14682:2007 "Safety of children clothing - Cords and drawstrings on children clothing - Specifications".
5. Commission Decision 2011/196/EU of 29 March 2011 on the compliance of standard EN 14682:2007 on cords and drawstrings on children's clothing with the general safety requirements of Directive 2001/95/EC of the European Parliament and of the Council and publication of the reference of the standard in the Official Journal (*notified under document C(2011) 1860*).
6. Directive 2009/48/EC of the European Parliament and of the Council of 18 June 2009 on the safety of toys (L 170, Official Journal of the European Communities 30.6.2009).
7. 'Best Practice Techniques in Market Surveillance', PROSAFE/EMARS 2008.

Standards can be obtained from the national standardisation bodies if nothing else is stated. An overview of these bodies can be found on the website of the European Committee for Standardisation, CEN at [www.cen.eu](http://www.cen.eu).

## Annex 1: Deliverables of the Activity

The deliverables of the Activity to submit to Chafea within the JA2012 programme:

Deliverable no.	Deliverable
D5.1CD	Planning of activities
D5.2CD	Kick-off and planning meeting
D6.1CD	2 <sup>nd</sup> project meeting
D6.2CD	3 <sup>rd</sup> project meeting
D7 CD	Guideline to Member States on exchange of information
D8.1CD	Sampling schemes
D8.2CD	Checklist and guideline with best practices for market surveillance
D10 CD	Market surveillance activities
D11.1CD	Follow-up activities
D11.2CD	Final Technical Report (this report)



## Annex 2: Meeting Minutes from the Activity

### 1. Kick-off and planning meeting

The Activity had its kick-off and planning meeting on 12 September 2013 in Brussels. In the open morning part of the day the Activity coordinator presented the JA2012 framework in which the Cords and Drawstring II Activity is incorporated.

The scope, primary focus and objectives of the Activity were presented. The discussion thereafter provided an opportunity for input from the present representatives of the European Commission, CEN, ANEC, EURATEX and the related EN-standard working group. Further introduction presentations were given by the former Activity coordinator Cords and Drawstrings I (2008) upon 'results and developments', the convenor of TC248 WG20 with regard to the applicable 'harmonised standard EN 14682:2007.

The Activity leader presented 'the European Home Authority Principle' as member of the EHAP Working Group, one of PROSAFE's method development activities under JA2012.

In the closed afternoon part of the meeting day, the outline of the Activity plan, 'the Gantt chart' has been discussed among participants. What will be needed to realise the plan and what can be used from the former Activity C&D I. Characteristic in the current Activity is that, this time, no tests at laboratory are foreseen.

Participants have to test themselves noncompliant garment, thus there is a strong need for adequate instruction and problem- and/or interpretation solving. Agreed, is to invite for next meeting the convenor of WG20 as external expert. That meeting shall take two days, one for instruction and sample investigation/interpretation, one for tool and reporting development.

The Activity distinguishes three phases, agreed is that in the coming up 'phase one' of the Activity:

- Participants shall sample C&D garments in their home markets for sharing experience and achieving a recent market overview in the next meeting; it is well known that children clothing is very fashionable and has a seasonal character.
- Participants will carry out an EHAP investigation among economic operators in the home market; the Activity leader provides an example from the Netherlands,
- Some participants (IE, CY, GR) will investigate and (further) develop together with the Activity coordinator inspection tools and reporting forms for the phases two (market surveillance) and three (follow up) under considering of what is suitable from C&D I.
- One participant (IE), member of PROSAFE's Risk Assessment Activity (RAA), will request for Risk Assessment cases for high-risk C&D scenarios in both age categories where the activity will focus on.

### 2. Second Project meeting

The second project meeting, a two-day meeting, took place from 16 to 17 January 2014, in Brussels. On day one the representatives of CEN and the European Commission/DG JUSTICE were present. The latter attended even both days.

#### Day one

Day one was divided in two parts. *First part* contained a review of the standard EN 14682:2007 by the external expert with opportunities to question complex standard items and interpretations regarding scope, definitions and requirements. *Second part*, a 'sample session', where all kinds of brought along garment-samples and garment pictures taken, served to explain the nonconformities which could be expected in the coming up phase two. The day was found very successful in sharing impressions from the current market for children clothing as such and in illustrating the variety of nonconforming cords and drawstring attributes.

Discussion has taken place concerning the inclusion of disguise clothing into the scope of the Activity. Disguise costumes are considered toys, moreover standard EN 14682 is also applicable on these toys. The ADCO-Toys have recently decided to implement the requirements for cords and drawstrings in the toy standard under the Toy Directive [6].

#### Day two

The day was focused on Risk Assessment, inspection tools and reporting means, all the instruments needed in phase two and phase three. Actions forthcoming from the first meeting have been reported and

discussed. A lot of improvement suggestions came up at the meeting. Building further on the Risk Assessment scenarios transmitted by PROSAFE's RA Activity (RAA) the activity leader elaborated, under consulting participants, in the meeting four 'more risky' C&D-scenarios, by using the online DG Justice tool. The included probability exercises were found very valuable. Summarizing, it could be agreed that, conform the discussion results, within a few weeks the following items shall be slightly revised by the drafters, aiming a start of the market surveillance phase end of January (M13):

- Inspection form, elaboration more specific on the Activity focus 'risky case' clauses,
- Checklist with clear pictures and wording to serve as an applicable standard excerpt,
- Quarterly reporting form, to bring in line with the revised inspection form.

### 3. Third Project meeting

The third project meeting was held on 3 July 2014 in the new PROSAFE Office in Brussels. A representative of the European Commission/DG JUSTICE was present. From two Authorities, the Cypriot and the Irish, new delegates were announced both due to resignation of the delegates in charge, the Irish delegate however could not attend due to the sudden change in his personnel planning.

C&D's 1<sup>st</sup> quarterly reporting power point presentation, by the Activity Leader earlier held on the PROSAFE JA2012 Workshop 13 May, was presented at the meeting for information.

The main issues discussed and shared at the meeting were:

- Additions to, analysing and exchange of Member States EHAP lists developments to date (doc 26); moreover the extended EHAP list, as a support-tool for reporting market surveillance intervention activities (doc 26C) has been discussed and shared among participants.
- Inventory and investigation of 'new' complex noncompliant brought along samples/pictures, 'Difficulties' could be solved rather easily due to the, in the meantime, standard-skilled participants.
- Experience and progress with the inspection visits executed to date were discussed.

Unfortunately this meeting has been the last planned meeting to discuss matters, a meeting for collecting and discussing inspection results is not foreseen in the Activity Plan, so future reporting of further results is restricted to e-mail exchange to the Activity Coordinator.

- Setting of an agreement in reporting statistical data from visits.  
It has been agreed that the Coordinator facilitates participants through regularly send requests for reporting progress by means of an overview table to insert new data in red. The overview is a totalising-excel sheet of the single annex list from deliverable D7CD.
- It appeared that the participating Member States have used and had to use all Market Surveillance months (M9-M21) due to a different local planning either concentrated or spread. So within this 2<sup>nd</sup> progress reporting it seems not to be useful to present unfinished and incomplete statistics 'for the present', although available (running doc 36).
- Experiences with C&D's RAPEX notification, the C&D-Risk Assessment scenarios developed and the possible types of measures. For this agenda item the representative of DG Justice called in the new installed RAPEX team leader to support the discussion.

Detailed information can be found within the minutes. The minutes of this 3<sup>rd</sup> meeting were prepared and distributed to all participants for comments to receive within two weeks, which led to Deliverable 6.2CD. The draft minutes of the 2<sup>nd</sup> two-day meeting were confirmed at this meeting (Deliverable 6.1CD).

# Annex 3: Checklist



**Children's clothing (0-14 yrs) Inspection Form C&D II** (please consult EN 14682:2007 and the pictures below)

Date of inspection:		Inspection Location (name and address):				Own registration nr:					
Inspector's name:											
Type of visit:	manufacturer	EU importer	distributor	retailer	Customs container checked						
					3.3	3.4	3.5	3.6	3.7	3.1	Other
	Chapters (and §§'s below) for appointment of non-conformities (NC's)				3.2						
Brand	Type and size				324	335	344				
					323	334	343			311	
					322	333	342		353		
					321	332	341		351		
						331	361		371		





Please fill in for each garment 'to check' the §'s of the requirement of the standard that is non compliant or fill in: 'OK'

## Annex 4: Guideline to the Checklist





The guideline was set up in cooperation between Portugal, Cyprus and the Netherlands. Pictures were selected from the instruction samples delivered by all participants.

Inspection of children's clothes guidance document for market surveillance officers; risk based selection (NB for exact wording and all requirements see EN 14862:2007)



### Age below 7 years (size up to 134)



Requirement EN 14682:2007	Remarks	Picture of noncompliant product
3.2.1 no drawstrings in hood or neck area		
3.2.1 no functional cords in hood or neck area		
3.2.3 shoulder straps are constructed from one continuous length.	And decorative cords attached to shoulder strap shall have no free ends longer than 75 mm and fixed loops shall be no more than 75mm in circumference	
3.2.4 no halter neck style garments with free ends		




## Age from 7 years to 14 years (size greater than 134 up to 176 girls and 182 boys)

Requirement EN 14682:2007	Remarks	Picture of noncompliant product
3.3.1 drawstrings shall have no free ends in hood or neck area	Check whether it is a drawstring by pulling one end to see if you're able to adjust the opening	
3.3.2 functional cords in hood or neck area no more than 75 mm in length	Not made of elastic except for shoulder straps and halter necks	
3.3.3 decorative cords shall be no more than 75 mm in length at either end	Length measured including any attachment such as a toggle.	
3.3.4 free ends of shoulder straps no longer than 140 mm	Length measured at the point to be tied this is not easy to determine (see fitting log producer)	
3.3.5 no halter neck style garments with loose ends		

## Other requirements for both age groups

Requirement EN 14682:2007	Remarks	Picture of noncompliant product
<b>Waist Area and Back Area</b>		
3.4.1 free ends of drawstrings maximum of 140 mm when the garment is opened to its largest and laid flat, and no more than 280 mm when closed to the intended size	Drawstrings shall be pulled so that they are flat in the channel. Stretch the garment to remove possible gathering or effect of elasticity without deforming the fabric or damaging the garment construction or stitching, while maintaining this extended position, lay the garment flat on the table and, without stretching the drawstring, straighten the drawstring, and measure from the exit point to the free end. The intended size you can find in the fitting log.	
3.4.2 functional cords, decorative cords and adjusting tabs in waist area maximum of 140 mm	In this example functional cords of bikini pants longer than 140 mm	

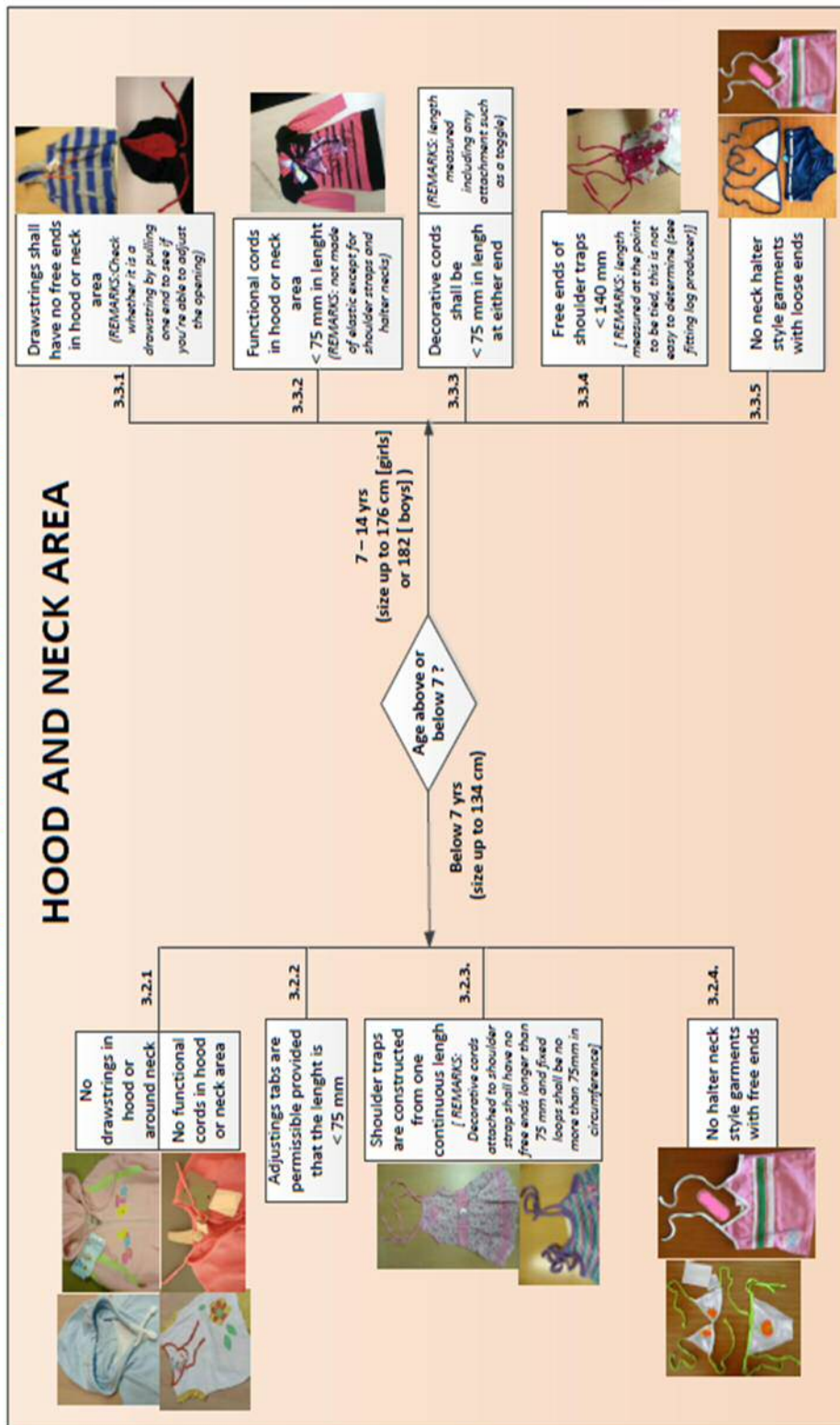
<p>3.4.3 under 7: tied belts and sashes (textile material &gt; 30 mm) intended to be tied at the back of the garment no more than 360 mm in length (measured from point to be tied) and untied do not hang below the hem</p>		
<p>3.4.4 above 7: tied belts and sashes (textile material &gt; 30 mm) intended to be tied at the back of the garment no more than 360 mm in length (measured from point to be tied)</p>		
<p>3.6.1 no drawstrings, decorative cords or functional cords that emerge from back of garment</p>	<p>Tied belts or sashes are permissible (see 3.4.3 en 3.4.4) The cord on the picture that should be tied at the back is too small to be considered as a sash (&lt;30mm width)</p>	

Requirement EN 14682:2007	Remarks	Picture of noncompliant product
<b>Below crotch</b>		
<p>3.5.1 drawstrings, decorative cords or functional cords below the crotch shall not hang below the lower edge of the garment</p>		
<p>3.5.3 garments that are designed to finish at the ankle drawstring, functional cords or decorative cords shall be totally inside of the garment</p>		
<b>Sleeves</b>		
<p>3.7.1 no drawstrings, functional cords and decorative cords outside of the long sleeved garment when fastened</p>	<p>Long sleeve means below the elbow</p>	
<b>Other requirements</b>		
<p>3.1.1 free ends of drawstrings, functional cords, tied belts and sashes have no three dimensional embellishments or knot</p>	<p>The ends may be doubled or folded</p>	

# Annex:5 Picture Guiding (3 pages)

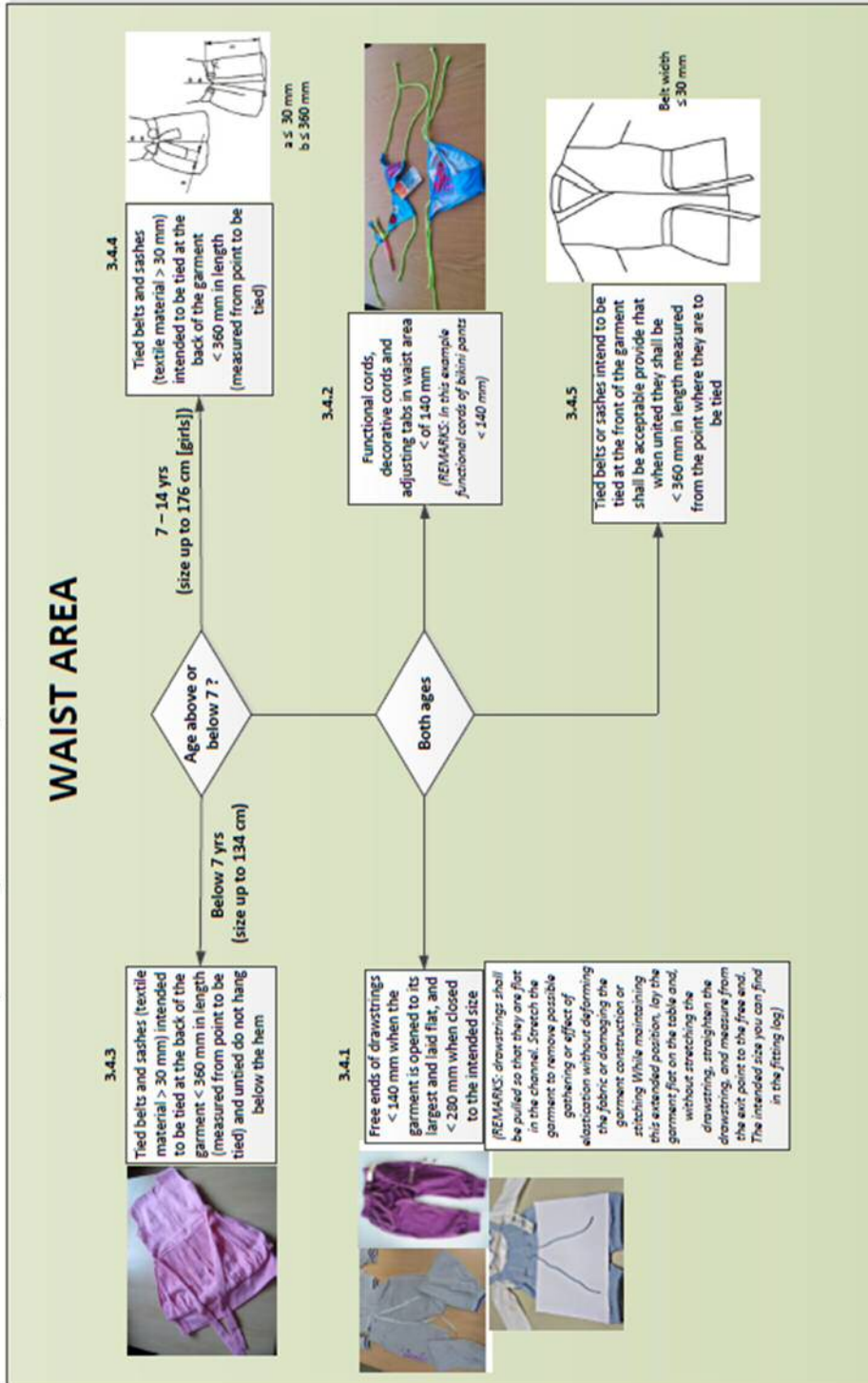
This picture guiding was set up in Cords and Drawstrings I and further elaborated by the Portuguese delegate.

## Inspection of children's clothes (with examples of non-compliant clothes - Please consult EN 14682:2007)



# Inspection of children's clothes

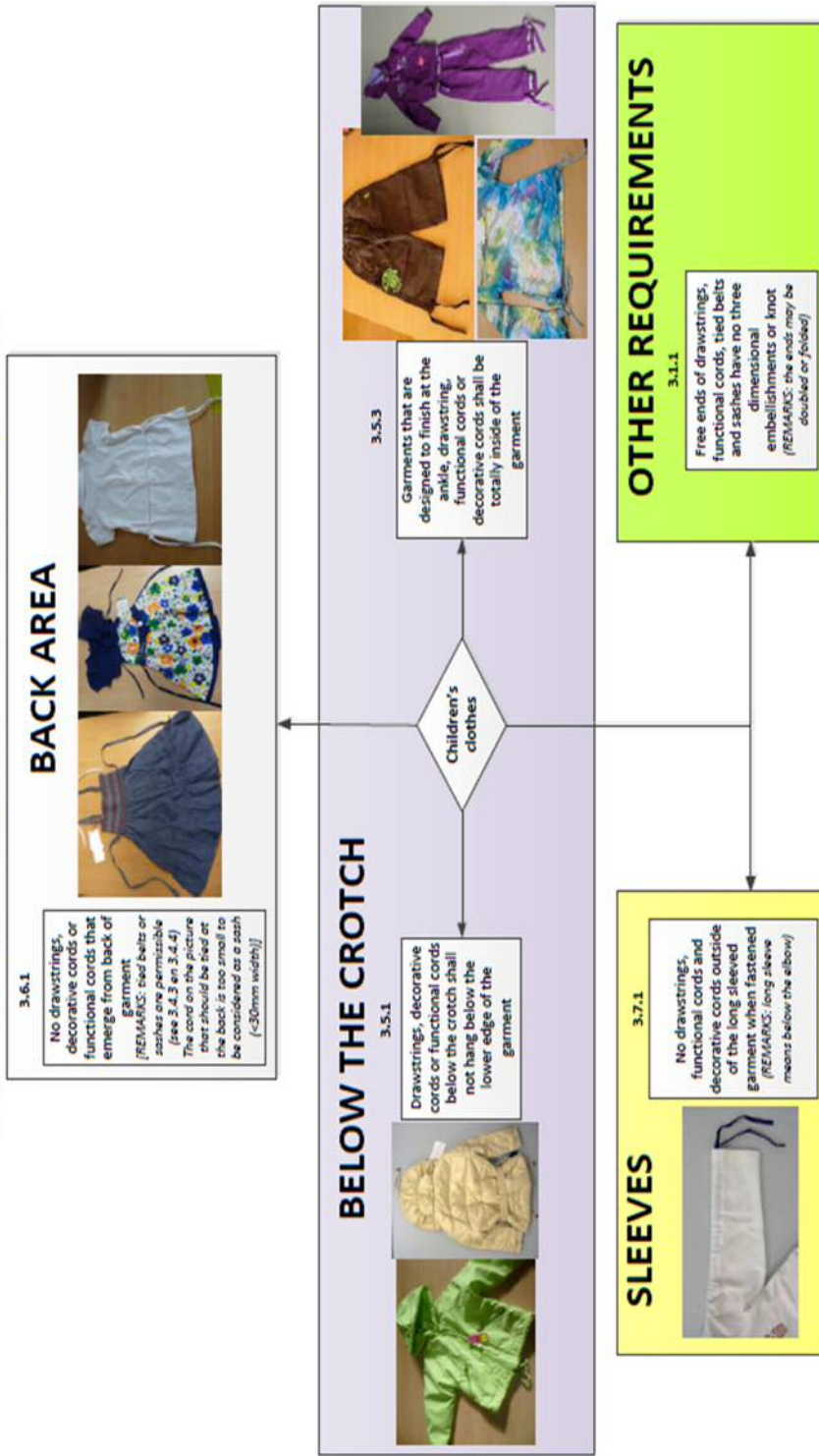
(with examples of non-compliant clothes - Please consult EN 14682:2007)





# Inspection of children's clothes

(with examples of non-compliant clothes - please consult EN 14682:2007)



## Annex:6 Quarterly Reporting Form

### Joint Action 2012 on GPSD Products

GA N° 2012 82 01

#### Activity: Cords and drawstrings in children clothes

**‘Three months’ reporting of statistical data (M13=January 2014)**

**I (M13+14+15)    II (M16+17+18)    III (M19+20+21)    T(otal)**

	<<< Member State - abbreviation (two characters)	I	II	III	T
<b>1</b>	<b>Numbers of inspections:</b> - Visits to manufacturers - Visits to EU-importers - Visits to distributors - Visits to retailers, - Customs containers checked				
<b>2</b>	<b>Number of garment models checked</b>				
<b>3</b>	<b>Statistics on nonconformities (to EN 14682:2007):</b> - Total number of nonconforming products (garment models) - Number of nonconforming products, category par 3.2 - Number of nonconforming products, category par 3.3 - Number of nonconforming products, category par 3.4+3.6 - Number of nonconforming products, category par 3.5+3.7 - Number of nonconforming products, category par 3.1 - Number of nonconforming products, category other par's				