

CODE OF PRACTICE

FLAMMABILITY LABELLING OF CHILDREN'S TOY DRESS-UP



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INTRODUCTION

CLOTHING CAN BURN RAPIDLY WHEN ACCIDENTALLY IGNITED BY CONTACT WITH AN OPEN FLAME OR SIGNIFICANT HEAT SOURCE. THIS CAN CAUSE SERIOUS INJURY, BURNS AND POTENTIALLY DEATH. CHILDREN ARE ESPECIALLY VULNERABLE IN CIRCUMSTANCES WHEN THEY ARE PLAYING WITHOUT SUITABLE ADULT SUPERVISION.

As a result of the increased risk, mandatory regulations are in place to control the fire performance of the fabrics used in nightwear and toys, along with compulsory labelling to make the consumer more aware of the dangers:

- The Nightwear (Safety) Regulations 1985
- The Toy Safety Directive 2009/48/EC / Toy Safety Regulations 2011

However, considering the potential risk and vulnerability of children, our members have considered whether it is necessary to go beyond the current EN71-2 testing standard to ensure safety.

Following these discussions the BRC has worked with the British Standards Technical Committee to approach CEN with a view to reviewing the appropriateness of the existing test standard EN 71-2.

BRC members recognise their duty of care to their customers, and their responsibility in selling products that are safe and legal. Whilst statistics and compliance with existing test methods indicate that dress up outfits appear safe retailers want to go further. This is to ensure safety test methods reflect the hazards presented by today's style of costumes, fabrics and finishes used.

The development of a new standard will take time, therefore the BRC and its members have introduced two voluntary Codes of Practice to improve the safety of children's dress up clothing. These requirements are in addition to the requirements of the Toy Safety Directive / EN71-2 and are being made available for anyone to use.

1. Additional Flammability Labelling of Children's Dress-up
2. Method of Test for the Flammability Safety of Children's Dress-up

This Code of Practice has been endorsed by The Royal Society for the Prevention of Accidents (RoSPA), The National Fire Chiefs Council (NFCC), Bedfordshire and Luton Fire and Rescue Service (BLFRS) and the Children's Burns Trust.

SCOPE

The scope of this document covers toy dressing up as identified in the relevant legislation / standards:

1. Article 2 (Scope) of the Toy Safety Directive (TSD) 2009/48/EC defines a toy as “a product designed or intended, whether or not exclusively, for use in play by children under 14 years of age”.
2. Children’s dressing-up outfits have to comply with all the requirements of the Toy Safety Directive. Dressing-up outfits are covered by the European Harmonised Standard EN 71-2: Safety of Toys Flammability, Section 4.3 Toy Disguise Costumes and Toys Intended to be Worn by a Child in Play
3. EU Guidance Document 17 on the Application of the Directive on The Safety of Toys, Carnival Costumes (disguise costumes, fancy dress)

A presumption of conformance with the Toy Safety Directive is given by compliance with the harmonised standard (i.e. EN71-2).

This voluntary Code of Practice is designed to provide additional labelling requirements for these products. This does not preclude members from using the same labelling for other products.

This code of practice does not cover adult dressing up, items that are not CE marked and items not classified as toy dress up e.g. wigs and masks, accessories etc.

LABELLING REQUIREMENTS

THESE LABELLING REQUIREMENTS ARE THE MINIMUM REQUIREMENTS AND ARE IN ADDITION TO THOSE REQUIRED IN ORDER TO COMPLY WITH THE REQUIREMENTS OF THE TOY SAFETY DIRECTIVE.

SEW-IN-LABELS

The garment must carry a permanent label with the words **WARNING! KEEP AWAY FROM FIRE** (in red letters) regardless of its testing performance

All words must be in medium letters of 10 point in upper case, in-line with the Nightwear (Safety) Regulations

The words must be in a durable print and must appear on the front of the a label in red print and of sufficient colour contrast to enable them to be clearly visible to the customer.

Each element (part) of the disguise costume must bear the required warning e.g. trousers, shirt, waistcoat, cape. This warning should also appear on the packaging as detailed below.

PACKAGING / LABELLING

Companies will provide additional flammability warning information on the outer packaging and labelling of products which is clearly visible and legible at the point of purchase. These warnings may appear in a variety of shapes, sizes and positions on the products.

The following wording should be used for the warnings:

WARNING! KEEP AWAY FROM FIRE

"Keep away from lit candles and naked flames" or other similar wording.

Alternatively, companies may also choose to label garments with the additional statement "This garment has undergone additional safety testing for flammability" if they have passed the additional testing requirements of the BRC Code of Practice on Method of Test for the Flammability Safety of Children's Dress-up.

DISTANT SELLING (ONLINE / PURCHASING FROM ADVERTISEMENTS / CATALOGUES ETC.)

All warnings contained on the garment should be visible to the consumer when purchased.

The contents of Appendix A & B BRC / ROSPA Halloween leaflet can be used to advise safety. No deviation in content whilst using the RoSPA logo is permissible without their prior consent.



Figure 1: Typical Example of swing tags

REFERENCES

Directive 2009/48/EC of the European Parliament and of the Council of 18 June 2009 on the Safety of Toys

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009L0048&from=EN>

Enacted in the UK as The Toys (Safety) Regulations 2011 No.1881

http://www.legislation.gov.uk/uksi/2011/1881/pdfs/uksi_20111881_en.pdf

Guidance Document No.17 on the Application of the Directive on the Safety of Toys, Carnival costumes (disguise costumes, fancy dress)

http://ec.europa.eu/growth/sectors/toys/safety/guidance/index_en.htm

CEN TR 15371-1: 2015 Safety of toys – Interpretations – Part 1: Replies to requests for interpretation of EN 71-1, EN 71-2, EN 71-8 and EN 71-14

EN 71-1 Safety of toys - Part 1: Mechanical and physical properties

EN 71-2 Safety of toys - Part 2: Flammability

The Nightwear Safety Regulations 1985

<http://www.legislation.gov.uk/uksi/1985/2043/contents/made>

Nightwear and Fire A Guide to Nightwear Safety Regulations

[http://www.ukft.org/documents/industryinformation/A%20Guide%20to%20Nightwear%20\(Safety\)%20Regulations%20-%201986.pdf](http://www.ukft.org/documents/industryinformation/A%20Guide%20to%20Nightwear%20(Safety)%20Regulations%20-%201986.pdf)

BS 5722:1991 Specification for flammability performance of fabrics and fabric combinations used in nightwear garments

APPENDIX A: ROSPA HALLOWEEN SAFETY LEAFLET



HALLOWEEN SAFETY

#Retailer Name# is working with The Royal Society for the Prevention of Accidents (RoSPA) to help people celebrate Halloween safely. Together we have come up with a few simple safety tips, to help you enjoy Halloween.

Please take a few minutes to think about safety in advance.

1. #retailer name# dress-up costumes are tested to rigorous flammability standards and should carry a **CE** mark.
2. If a dress-up costume catches light it may still burn, but the speed at which the flame spreads is slower. Homemade dress-up costumes or those not tested to the same flammability standards may ignite easily and burn quicker.
3. As with all clothing Halloween outfits should always be kept away from fire, lit candles and all other naked flames
4. If lit candles are part of your celebrations always follow their safety guidelines; remember:
 - Always supervise children and pets if using lit candles
 - Do not allow children to carry, play, reach over, light or be near lit candles.
 - Never leave a burning candle unattended.
 - Remember always to extinguish a candle completely after use.
 - Do not carry pumpkins with lit candles inside.
 - Take care when using candles at Halloween, especially those in a pumpkin.
 - For additional safety, consider using battery-operated candles.
5. When trick or treating, children should always be supervised by a suitable adult.
6. Ensure children can be seen in the dark, ideally they should wear something reflective such as a reflective strip or glow stick, and carry a torch.
7. Remind children of how to cross roads safely before leaving home.
8. Remove any Halloween make-up or fake blood immediately if irritation occurs. It could be the first indication of an allergic reaction to something within the cosmetic.
9. Follow the Firework Code (see www.saferfireworks.com for more information).

APPENDIX B: ROSPA DRESS-UP SAFETY LEAFLET



DRESS-UP SAFETY

#Retailer Name# is working with The Royal Society for the Prevention of Accidents (RoSPA) to help children play safely in their dressing up outfits. Together we have come up with a few simple safety tips, to help you enjoy this form of play.

Please take a few minutes to think about safety in advance.

1. #retailer name# dress-up costumes are tested to rigorous flammability standards and should carry a **CE** mark.
2. If a dress-up costume catches light it may still burn, but the speed at which the flame spreads is slower. Homemade dress-up costumes or those not tested to the same flammability standards may ignite easily and burn quicker.
3. As with all clothing dress-up outfits should always be kept away from fire, lit candles and all other naked flames. If lit candles are part of your celebrations always follow their safety guidelines.
4. Ensure children can be seen in the dark; ideally they should wear something reflective such as a reflective strip or glow stick, and carry a torch.
5. Remind children of how to cross roads safely before leaving home.
6. Remove any make-up or face paint immediately if irritation occurs. It could be the first indication of an allergic reaction to something within the cosmetic.

ACKNOWLEDGEMENTS

The BRC would like to thank all those committee members who actively contributed to this code of practice. Contributing companies:

ALDI	Morrisons	The Disney Store
Asda Stores Ltd	Next Retail Ltd.	Waitrose
Boots UK Limited	Sainsbury's	Wilko Retail
Home Retail Group	Tesco Stores Ltd	
John Lewis plc	The Co-Operative Group	

Proudly endorsed by:



NFCC
National Fire
Chiefs Council



CBT
CHILDREN'S BURNS TRUST

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The logo for the British Retail Consortium (BRC), consisting of the letters 'BRC' in a bold, purple, sans-serif font. The 'B' is stylized with a white shape inside it.