

GUIDELINES

NAPPY SACKS



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BACKGROUND

Nappy sacks are disposable, often perfumed, plastic bags into which soiled nappies are placed after removal from babies and prior to disposal. They tend to be made of very thin coloured plastic.

Asphyxiation is a common cause of death, especially for babies under 1 year. The hazard associated with plastic packaging has been recognised for many years. The need to minimise this risk associated with packaging is recognised in the Toy Safety Directive (2009/48/EC) (Annex II, clause I, 4(e))¹.

Nappy sacks have recently been identified as causing suffocation and choking of babies under one-year-old. Authorities in the UK have become aware of at least 17 deaths associated with individual nappy sacks.

The typical scenario associated with the deaths is that the nappy sacks are stored within the baby's reach, close to the baby's cot, including under the mattress. This method of storage is often for convenience. In some of the cases, the nappy sacks had been left near to or in the baby's cot for ease of changing the baby's nappy in the night. These loose nappy sacks are within easy reach of babies.

Informal feedback from parents and carers and professionals demonstrated that the risk to young babies is compounded by the fact that widespread usage of nappy sacks is a relatively recent phenomenon. Parents and carers are generally aware of the dangers posed by plastic bags, but do not make the same link to nappy sacks and so are less likely to take the same safety precautions.

Nappy sacks are usually sold in packets containing 100-200 sacks, costing approximately 0.01p per sack. In the packets the sacks are usually separate rather than on a roll,

the typical method of supply of plastic bags used for food storage bags and garbage bin liners.

The risk of this potential hazard is increased by the lack of a mandatory suffocation warning advice on the packaging.

Babies are at particular risk of suffocation and choking from plastic sheets and bags for a number of reasons:

- They cannot understand the risks associated with their actions.
- They seek to explore the world around them by, among other actions, putting articles in their mouth to experience taste and texture.
- They do not have the manual dexterity to remove thin plastic covering that is "adhering" to their face or is in their mouth.
- Parents are not aware of the risks associated with nappy sacks.

The General Product Safety Regulations 2005 require products to be accompanied by suitable warnings to enable the product to be used safely. BRC members recognise their duty of care to their customers, and their responsibility in selling products that are safe and legal: BRC members support the reduction of the risks associated with these products.

Parents welcome the opportunity to use the convenience of nappy sacks to make the disposal of nappies easier. A dual approach, is needed in order to reduce the risks associated with this widely-used consumer product:

1. Raise awareness of the potential for accidents and how to prevent them.
2. Promote the continued development of safer products on the market.

¹ "The packaging in which toys are contained for retail sale must not present a risk of strangulation or asphyxiation caused by airway obstruction external to the mouth and nose."

SCOPE

There is no specific legislation covering nappy sacks however there is a responsibility under the General Product Safety Regulations 2005 to only supply "Safe Products".

This guideline covers all products sold as Nappy Sacks. It does not cover any other plastic bag; dog waste bags, sanitary disposal bags, swing bin liners etc. that may be used as a means of disposing of a nappy, but for which it is not their intended use.

PRODUCT CONSIDERATION

- Unscented may be less attractive to babies.
- Black bags may be less appealing than a coloured bag.
- Bags produced on a roll (not as individual sheets) are harder for babies to access.
- Individual sheets sold in rigid opaque/solid containers with click to open openings are inaccessible to babies and young children. Parents should be reminded though that some young children may still be able to open these containers, and to store them out of reach.

LABELLING REQUIREMENTS

Back of pack warnings should be clear and legible and at least the same size as the main text.

It is not intended for this guideline to be prescriptive in the choice of language used by individual members. It is suggested that any warning shares similar sentiments to the following

WARNING

Risk of suffocation. Always keep nappy sacks away from babies and young children.

Never place nappy sacks in or near a baby's cot or pram.

Be aware: nappy sacks are extremely light and flimsy and can easily be blown off a surface and become within the reach of a child.

Loose bags are a danger! Never leave loose bags lying around - only remove nappy bags from packaging as needed or store removed bags in a secure container.

WARNING

Risk of suffocation. Always keep nappy sacks away from babies and young children.

To be located at front of pack / point of extraction wherever possible.

There will be a transition period of 12 months from publication of the guidelines.

The BRC would welcome the development of a clearly understood pictogram for use on the extraction point on the pack.

RoSPA NAPPY SACK SAFETY PROMOTION

RoSPA has agreed the use of the following message along with their logo that can be used in the promotion of the safety message. No alteration in the message whilst using the RoSPA logo is permitted without their expressed permission.

Members are of course free to use their own messaging but this should not be accompanied by the RoSPA logo without their express permission.

The RoSPA contact details are available from the BRC.

#Retailer Name# is working with The Royal Society for the Prevention of Accidents (RoSPA) to reduce the risk of suffocation from Nappy sacks. Together we have come up with a few simple safety tips.

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

Babies can suffocate on nappy sacks, making some simple changes can make a big difference to your child's safety.

#retailer name# has taken steps to ensure that nappy sacks have been packaged and labelled to help reduce the risks associated from nappy sacks.

Do:

- Always keep nappy sacks and other plastic bags and wrapping away from babies and young children

Do not:

- Place nappy sacks within babies' reach
- Place nappy sacks in a baby's cot pram or buggy

The RoSPA leaflet (Appendix A) is available for purchase along with adding your own logo.

APPENDIX A ROSPA NAPPY SACK LEAFLET

Children can swallow, inhale, or choke on other items such as small toys, peanuts and marbles

- Choose toys appropriate to the age of the child
- Ensure that small objects are kept out of reach of children under three
- Looped cords on blinds and curtains should be avoided especially in children's bedrooms. Keep them tied up high and out of reach
- Small foods such as grapes, cherry tomatoes, blackberries and other soft fruits should be cut into quarters to prevent choking
- Keep button cell batteries out of reach of children, they can cause severe injuries if swallowed
- Don't forget plastic bags can also be very dangerous to small children.

For more home safety information visit www.rospea.com/resources/hubs/

ROSPA
accidents don't have to happen

Department for Business, Energy & Industrial Strategy

Babies can suffocate on nappy sacks



Keeping your baby safe

Help and advice for parents and carers of young children

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Nappy sacks can kill

at least 16 babies in the UK have already died

Making some simple changes can make a big difference to your children's safety. Help us to prevent any more babies from needlessly dying.

To avoid danger of suffocation and choking:

- ✔ **Do:**
Always keep nappy sacks and other plastic bags and wrapping away from babies and young children.
- ✘ **Don't:**
Place nappy sacks in a baby's cot, pram or buggy.

Why do nappy sacks pose a suffocation hazard to babies?

- Young babies naturally grasp anything and put it in their mouths, but they find it more difficult to let go.
- Nappy sacks are flimsy and are small enough to fit in little mouths.



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