CF99-1-130

National Cotton Council OF AMERICA

CPSC/OFFICE OF THE SECRETARY

1999 MAR 22 P 4:

March 22, 1999

Ms. Sadye Dunn
Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207-0001

Re: ***Sleepwear Revocation*** **– Comments of the National Cotton Council to CPSC's Proposed Revocation of Amendments to the Children's Sleepwear Flammability Standards, 16 CFR 1615 and 1616 (64 FR 2867; Jan. 19, 1999)**

Dear Ms. Dunn:

These comments are submitted by the National Cotton Council (NCC) in response to CPSC's Jan. 19, 1999 (64 FR 2867) request for comments on "Proposed Revocation of Amendments; Standards for Flammability of Children's Sleepwear." NCC is the central trade association of the American cotton industry. NCC members include producers of over 75% of the US cotton and cotton processing industries. The US cotton industry has a long history of a deep commitment to the safety of consumers.

NCC has been actively involved with this issue since the CPSC first started the process to amend the Children's Sleepwear Flammability Standards sizes 0-6x (16 CFR 1615) and sizes 7-14 (16 CFR 1616) in November 1991 (when it became a priority program and formal review began), which resulted in the September 1996 amendments. In addition, NCC was involved in the original rulemakings in the early 1970's, which resulted in the standard for sizes 0–6x in 1971 (16 CFR 1615) and the standard for sizes 7-14 in 1974 (16 CFR 1616) and the rulemaking for the 1977-78 amendments, because of "Tris", which lessened the standards by removing the melt-drip flammability requirements for garments. Since publication of the most recent amendments (61 FR 47634; September 9, 1996) to exclude garments sized for infants 9 months of age or younger and tight-fitting sleepwear garments for children older than 9 months, NCC has worked with other industry representatives on the development of a voluntary consumer information and education program.

NCC was also involved with CPSC in their enforcement activities from 1980 to Nov. 1991 during which time CPSC published at least eight enforcement guidances and issued a compliance briefing package (July 2, 1990). These enforcement activities were followed by the Jan. 13, 1993 (58 FR 4078) "Stay of Enforcement" of sleepwear requirements against garments currently being used as sleepwear that are labeled and marketed as "underwear". Market data on sleepwear, underwear, and playwear from

1992 to 1998 that are attached and discussed later, show changes in the markets, attributed to underwear used as sleepwear, starting in 1993-94, as a result of the stay of enforcement. This gives CPSC additional data from 1994 which show that tight-fitting garments are not a risk and along with data from Canada and other countries strongly support and reinforce the CPSC finding that the amendments do not diminish the safety provided by the Children's Sleepwear Flammability Standards.

NCC supports the 1996 CPSC amendments, which exclude from the existing sleepwear standards (16 CFR 1615 and 16 CFR 1616) infant garments for 9 months or younger and tight-fitting garments for children older than 9 months. NCC supports these exemptions, because there is no indication from technical data (mannequin research, etc.), and from burn injury and fatality incidence data, from the US, Canada, and other foreign countries, that these garments present an unreasonable risk of fire leading to death, injury, or significant property damage or that these amendments diminish the protection provided by the children's flammability standards. These garments never should have been included in the original children's sleepwear flammability standards – there never has been data to support the coverage of these garments under the children's sleepwear flammability standards.

NCC agrees with CPSC (61 FR 47634; Sep. 9, 1996) that these exemptions afford a wider selection of sleepwear garments to the consumer without reducing the protection provided by the standards.

I. TIGHT-FITTING GARMENTS SHOULD BE EXEMPT FROM THE CHILDREN'S SLEEPWEAR FLAMMABILITY STANDARDS (16 CFR 1615 AND 1616).

All currently available data strongly demonstrate that loose and flowing nightwear garments are the kind of nightwear involved in burn injuries and fatalities (59 FR 53620; Oct. 25, 1994, ref. 8, 10, 11 and 61 FR 47634; Sep. 9, 1996); that tight-fitting garments are less likely to contact an ignition source and if ignited burn less rapidly than loose fitting garments; and that tight-fitting sleepwear does not present an unreasonable risk of fire leading to burn injury or death to children.

It should be remembered that only sleepwear is covered by these standards, which are meant to protect children wearing sleepwear when they are up and ambulatory. Contrary to the misleading information conveyed by some, these amendments did not affect loose pajamas, nightgowns, and robes, which are the kind of nightwear involved in burn injuries and fatalities. Those items still must meet the requirements of the Children's Sleepwear Flammability Standards and be fire resistant. In addition, tight-fitting garments must comply with the Standard for the Flammability of Clothing Textiles, 16 CFR 1610.

A. Close fitting garments are one of the safest types of garments (Attachment 1) because: (1) They are not easily ignited because the body acts to absorb heat from the ignition source and thus, helps to slow the heating of the fabric to the point at which

ignition can start; (2) They make the wearer immediately aware of an ignition source, since the heat of a match or lighter flame is transferred through the fabric directly to the skin; (3) If they are ignited, they tend to burn slowly, because only one side of the fabric receives sufficient oxygen to support combustion. Using mannequins and video-tape recordings, the safety of tight-fitting garments has been demonstrated and illustrates why those garments do not represent an unreasonable flammability hazard.

B. Canada originally adopted the US children's sleepwear flammability standards but modified them in 1987. The major reasons for amending their standard were results from mannequin testing of garments that were described in a Final Report to the Consumer and Corporate Affairs Canada by E.M. Crown, U. of Alberta, July 1985 and a Canadian Medical Association paper (J.R.S. Stanwick, CMAJ 132, 1143, 1985). (Attachment 1)

The medical study by Stanwick found that "style of clothing (loose and flowing as opposed to snug) was the most significant predictor of burn severity, length of hospital stay, the need for skin grafting and survival." The mannequin study by Crown found that garment design and construction parameters were the most important factors to fire hazard potential. Mannequin research conducted in the US in the 1970's also demonstrated the significant differences in flame propagation between snug fitting and loose fitting garments. Of all styles tested, the cuffed ski pajama/sleeper style knit fabric appeared to be the safest. Knit cuffed garments are the types of cotton and cotton/polyester garments that can meet the CPSC tight-fitting definition and most likely are the new products coming into the sleepwear market.

Since promulgation of the amended Canadian sleepwear standards in 1987, no burn deaths associated with children's sleepwear have been reported in Canada (61 FR 47634; Sep. 9, 1996). In fact, in Canada a five-year study to collect data concerning burns associated with children's sleepwear was undertaken to assess the effectiveness of the regulations but the five-year study was discontinued before the period was up due to a lack of burn cases (Attachment 2 and ref. 63, 61 FR 47638). Attachment 2 is a December 18, 1995, letter from Therese Gagnon, Acting Chief, Mechanical and Electrical Hazards Division, Health Canada, Health Protection Branch, Product Safety Bureau, to Patty Adair of NCC concerning the Children's Sleepwear Flammability Standards and the Canadian experience that states:

> **"Since the Regulations have come into effect, injuries due to the ignition of children's sleepwear are no longer an issue in Canada."**

Since most of Canada's population lives near its southern border, the environmental conditions are not dramatically different from those northernmost USA states. Recent fire data indicated that the number of fires in Canada and the US are about the same once an adjustment is made for the difference in population and outdoor brush and trash fires and vehicle fires are excluded. Civilian fire death rates per million population in the USA and Canada have always been very close. The principal difference is that vehicle fires are higher in the USA. (J.R. Hall, Jr., Fire in the USA and Canada, International Fire Comparison Report #2, NFPA, November 1995.)

Canadians generally have more cotton/polyester blends in their children's sleepwear marketplace than 100% cotton. According to Vickers et al. and others [A. Vickers, J. Krasny and H. Tovey, 7th Annual Meeting ICFF, 1973, pp. 205-226; J.M. Weaver, Textile Chemist and Colorist, 8. 176-181 (1976); C. Walker and H.L. Needles, Journal of Fire Science 3, 461-471 (1985)], 100% cotton and cotton blend fabrics perform similarly in the general apparel flammability test. In the vertical flame test, cotton/polyester blends may perform worse than 100% cotton. However, the important point is that there are still no incidents even though Canada has more smokers and heat sources, no cigarette lighter standard, and defines tight-fitting more liberally than CPSC. So 100% cotton and cotton/polyester blends are equally safe according to the available information.

C. Australia and New Zealand also have standards that include fit characteristics that exempt tight-fitting garments. The burn injury and fatality data in these countries show that these standards are working (59 FR 52620; Oct. 25, 1994 and 61 FR 47634; Sep. 9, 1996).

D. Other than the United Kingdom, no other European country has legislation or standards specifically to control the fire safety of children's sleepwear. The UK Nightwear (Safety) Regulations 1985 (finalized December 20, 1985) came into effect March 1, 1987. (These regulations replaced the Nightdresses (Safety) Regulations 1967c.) Certain garments do not have to comply with the flammability standard but must carry a permanent label showing whether or not they meet this flammability standard. These include: children's pajamas, cotton terry bath robes, and any garment for a baby under three months. Even though, since 1987 the UK has allowed children's nightwear that does not meet strict vertical flame test requirements in the marketplace (if it is labeled), burn injuries are a rare occurrence. When burn injuries do occur, they are when children are wearing loose flowing garments (a class that has to comply with a vertical flame test). (For more details, see data submitted with the comments of the NCC to CPSC, March 15, 1993.)

E. CPSC reviewed burn injury and fatality data from NEISS involving clothing for 1980 through 1993 and found loose fitting nightgowns or pajamas were the usual kind of nightwear involved in injuries (ref. 10, 59 FR 53625 and 61 FR 47634). Review of all data since 1993 to the present by CPSC has not found any burn death associated with tight-fitting sleepwear or for infants under 15 months. In addition, burn injuries associated with the general category of children's clothing have not increased since 1993 (61 FR 47639; Sep. 9, 1996).

F. On January 13, 1993 (58 FR 4078), the CPSC issued a "stay of enforcement" of the children's sleepwear requirements against garments currently being used as sleepwear that are labeled and marketed as underwear. The garments covered by the stay of enforcement have somewhat larger dimensions than "tight-fitting" garments defined in the amendments (61 FR 47638). During the stay (Jan. 13, 1993 to June 1, 1998) which exempted garments currently in the marketplace and labeled as "underwear," which was being used as sleepwear in a substantial number of cases, there was no increase in burn

injuries or deaths. Market data for sleepwear, underwear and playwear from 1992 to 1998 show sales of underwear increasing by 1994 and Earnshaw's attributes this gain to underwear used as sleepwear (Tab. E, Oct. 1995 CPSC Briefing Package, Memo by T. Karols). Please see the section on market data discussed later and Attachment 3. The fact that tight-fitting underwear was being used as sleepwear from 1993 on, gives CPSC a larger database to show that tight-fitting garments are not involved in burn injuries and fatalities.

G. Therefore, CPSC has very strong data indicating that the exemption of tight-fitting garments from the children's sleepwear flammability standards do not diminish the protection provided by the children's sleepwear standards. When the original children's sleepwear standards were promulgated in 1971 and 1974, there were no data to justify including tight-fitting garments. None of the garments in the database used to justify the standards were tight-fitting garments. However, the philosophy of the Agency at that time was to cover everything even those products that were not shown to be a risk. Mannequin studies and actual experience in the UK, Canada, Australia, New Zealand and the US (since 1993) continue to show that tight-fitting garments are not the types of garments that are involved in burn injuries and fatalities. CPSC, therefore, after almost 5 years of intense, thorough study was correct in excluding these garments from 16 CFR 1615 and 1616.

II. GARMENTS SIZED FOR INFANTS 9 MONTHS OF AGE OR YOUNGER SHOULD BE EXEMPT FROM THE CHILDREN'S SLEEPWEAR FLAMMABILITY STANDARD SIZES 0 THROUGH 6X (16 CFR 1615)

The accidents which children who are wearing sleepwear experience do not happen while the child is sleeping, but rather when he or she is up and around the house. That is the purpose of the Children's Sleepwear Flammability Standards – to protect the child when the child is up and ambulatory not when the child is in bed. In these activities a child can obtain matches, cigarette lighters, candles, or be exposed to other sources of flame, including stoves and space heaters. But these exposures are not encountered by infants and pre-ambulatory children. Infants and pre-ambulatory children are children younger than one year usually.

There are very few cases on record of fire accidents to pre-ambulatory children. In every instance, these accidents would have occurred no matter what type of clothing the child was wearing. For example, there was a house fire, or a crib fire, or some other general conflagration in which the garment was not the first to ignite, but instead became involved in a larger, external fire situation. The Canadian experience for burn fatalities for infant sleepwear sizes is similar to the US as reviewed by CPSC – there are no cases under 15 months.

When 16 CFR 1615 was adopted, some attempts were made to exempt infant's sleepwear (sizes 0-1) from the standard, because it was recognized that infant garments were not the ones toward which the safety standard was being directed. However, the general philosophy of the agencies at that time was to cover every conceivable eventuality.

Therefore, quite unnecessarily, infant sleepwear garments were included within the purview of the standard. It is significant that these infant items are not included in the Canadian, Australian, and New Zealand Children's Sleepwear Flammability Standards, all of which are effectively protective standards (59 FR 52620 and 61 FR 47634).

The rare or exceptional accidents for infants lying in their cribs, still occur. However, complying fire resistant garments also provide no protection from injury under these unusual circumstances. In fact, they provide less protection than untreated cotton garments. If the bedding or crib or the house burns, or if something burning is tossed on the bed and over the child, none of the products on the market, fire resistant or not under 16 CFR 1615 and 1616, will provide protection from injury.

III. SLEEPWEAR AND UNDERWEAR MARKET DATA SHOW CHANGES IN THE MARKETS SINCE THE STAY OF ENFORCEMENT

The General Accounting Office (GAO) was required by 1998 legislation to review burn incidence data from the ignition of children's sleepwear from small open-flame sources for the period July 1, 1997, through Jan. 1, 1999, to help CPSC evaluate whether the amendments which exclude (1) garments sized for infants 9 months of age or younger and (2) tight-fitting garments for children older than 9 months diminish the protection to the public provided by the CPSC Children's Sleepwear Flammability Standards. It is suggested by some that this may be too short a period to obtain meaningful information on burn injury and fatality incidence data on the amended standards.

CPSC issued a stay of enforcement on Jan. 13, 1993 (58 FR 4078) of the children's sleepwear requirements against garments currently being used as sleepwear that are labeled and marketed as underwear, if those garments are skin-tight or nearly skin-tight. The garments covered by the stay have somewhat larger dimensions than "tight-fitting" garments defined by the amendments (61 FR 47638). Data on these markets for 1992 through 1998 give information on trends since the stay became effective (Attachment 3). These data can help show when tight-fitting non-fire resistant sleepwear started coming into the marketplace.

Data is included in Attachment 3 on consumption of materials and US retail sales of infants (0 to 3 years), girls (3 to 7 years and 8-13 years) and boys (3 to 7 years and 8 to 14 years) sleepwear, underwear, and playwear for 1992 through 1998 obtained from the National Purchase Diary (NPD) and Cotton Incorporated Analysis (Ann Keys, 919/510-6141) based on consumer data from NPD. The National Purchase Diary database is comprised of reports on the purchasing habits of 16,000 US families who represent the US demographic. NPD families record every purchase made or gift received in a diary and the information is then entered into the NPD database. This is considered the best database for products purchased in the US. It includes both domestic and imported garments purchased in the US. Cotton Incorporated further analyzes these data and makes determination of the total fiber and cotton fiber in these markets. The National Purchase Diary includes infants (ages 0-12 months) and toddlers (13-35 months) as one category. It is not possible to extract data on just the 0-12 month age range.

Market data on sleepwear and underwear from 1992 to 1998 indicate that sales of underwear and cotton's share of the sleepwear market started increasing in 1994 (also see Tab. E, Oct. 1995 CPSC Briefing Package) and Earnshaw's (trends publication) attributes this gain to underwear used as sleepwear. Even though all markets for sleepwear and underwear have increased since 1993, because the population has increased, the big increase in both of these markets is for cotton. This again is indicative that the stay of enforcement increased the amount of tight-fitting garments being used as sleepwear.

The US burn injury and fatality incidence data since the 1993 stay do not indicate that tight-fitting garments diminish the protection of the Children's Sleepwear Flammability Standards even though the tight-fitting garments covered by the stay have somewhat larger dimensions than the tight-fitting garments defined by the amendments. It should also be considered that Canada changed their standard in 1987, using somewhat larger dimensions for tight-fitting than CPSC and since these changes "injuries due to ignition of children's sleepwear are no longer an issue in Canada" (Attachment 2). Australia and New Zealand also have standards since the 1970's with larger dimensions than CPSC and their standards are effective.

III. OTHER

Some also argue that a more severe Children's Sleepwear Flammability Standard is required in the US because we have more residential fires than almost any other country. This argument is without merit since in the US the number of residential fires where "all wearing apparel worn" was the form of material first ignited was less than 0.2% (CPSC Report, 1993 Residential Fire Loss Estimates, Nov. 1995). So sleepwear is an insignificant source of residential fires.

IV. CONCLUSIONS

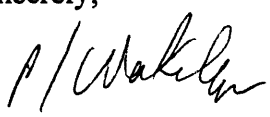
There is no basis to overturn the CPSC decision to amend the children's sleepwear flammability standards. All available burn injury and fatality incidence data from the US and all other countries, as well as technical studies with mannequins, support the CPSC conclusions that the amendments to the Standards for Flammability of Children's Sleepwear (sizes 0 through 6x and 7 through 14, 16 CFR 1615 and 1616) which exclude tight-fitting sleepwear garments and garments sized for infants 9 months of age or younger do not diminish the protection to the public from unreasonable risk of fire provided by these standards. The CPSC conclusions to amend the standards were arrived at after almost five years of intense and thorough study and notice and comment rulemaking, including an ANPR, an NPR and a final rule, each proceeded by extensive briefing packages outlining the rationale for the staff recommendations. Changes in lifestyle in the US, as in other countries, e.g., in smoking habits, elimination or reduction in use of space heaters and other socio-economic changes, also provide additional reasons that these amendments to the children's sleepwear flammability standard were the justifiably correct thing to do.

The 1971 (16 CFR 1615) and 1974 (16 CFR 1616) standards were overly severe in that they excluded things that were not a risk. None of the garments in the database used to justify the original standards were tight-fitting garments and infant garments. The philosophy of the Agency at that time was to cover everything, even products that were not shown to be a risk. All available data indicate that covering these garments under the standard was overly severe. CPSC, therefore, was correct in amending the standard to exclude tight-fitting sleepwear and garments for infants 9 months or younger. CPSC is correct in its determination that these amendments afford the consumer a wider selection of sleepwear garments without reducing the protection provided by the standards.

These changes make the US Children's Sleepwear Flammability Standards similar to the Canadian Children's Sleepwear Flammability Standard as well as more consistent with standards in other countries. This helps harmonization of standards for trade purposes.

NCC appreciates the opportunity to comment on this rulemaking and urges CPSC to maintain and not revoke these amendments that exclude infant garments sized 9 month of age or younger and tight-fitting garments. If you have questions regarding these comments, please contact me at 202/745-7805.

Sincerely,



Phillip J. Wakelyn, Ph.D.
Senior Scientist, Environmental Health & Safety

Attachment 1

Health Canada Letter
(T. Gagnon to P. Adair)

Health Canada / Santé Canada
Health Protection Branch / Direction générale de la protection de la santé

Product Safety Bureau
Place du Portage, Phase I
17th Floor, Zone 4
Hull, Québec
K1A 0C9

Ms. Patty Adaire
Special Assistant
Technical Services
National Cotton Council of America
1521 New Hampshire Avenue, NW
Washington, D.C. 20036
U.S.

Dear Ms. Adaire:

Thank you for your facsimile of November 30, 1995, regarding the flammability of children's sleepwear.

Children are considered more susceptible and vulnerable to accidents involving flammable clothing. At the time Children's Sleepwear Regulations were developed, several fires involving children's sleepwear (one of which caused a fatality) demonstrated the need for a higher level of protection than for general wearing apparel. In addition, a more stringent requirement was needed to remove highly flammable fabrics from the manufacture of children's sleepwear. As a result, a consensus was reached to impose 7 seconds with no base ignition, as a requirement for children's sleepwear.

Since the promulgation of the Regulations in September 1987, no death has been reported due to ignition of sleepwear. A study to collect data concerning burns associated with children's sleepwear was undertaken to assess the effectiveness of the Regulations. The study was designed to take place over a five-year period; however, the study was discontinued before the period was up due to a lack of burn cases. Since the Regulations have come into effect, injuries due to the ignition of children's sleepwear are no longer an issue in Canada.

We do not have data with regard to weight, fibre type and construction as it related to time of flame spread and the general wearing apparel standard (particularly with regard to raised surface fabrics).

.../2

Canada

Attachment 2

Stanwick, R.S. 1985. Clothing burns in canadian children. *Can. Med. Assoc. J.* 132, 1143-1149.

Clothing burns in Canadian children

Richard S. Stanwick, MD, FRCPC

A Canadian survey of 11 tertiary care pediatric centres with specialized burn facilities revealed that an estimated 37 children up to 9 years of age are admitted annually to such hospitals because of clothing burns. Sleepwear accounts for an estimated 21 such burns per year. Girls were found to suffer the most severe burns and represented eight of the nine children in the series who died. Loose and flowing garments dominated the girls' styles. The results of multiple-regression analysis confirmed that style of clothing (loose and flowing as opposed to snug) was the most significant predictor of burn severity, length of hospital stay, the need for skin grafting and survival. The ignition situation (avoidance of parental supervision at the time of injury) was the only other important predictor. The success of regulatory actions in other countries in reducing the incidence of severe clothing burns is reviewed, and preventive strategies for Canada are explored.

Enquête auprès de 11 services canadiens de soins pédiatriques tertiaires pourvus de moyens spécialisés pour le traitement des brûlures. Quelque 37 enfants de moins de 10 ans y sont hospitalisés chaque année pour des brûlures par des vêtements; dans 21 cas il s'agit de vêtements de nuit. Les brûlures les plus graves, dont huit des neuf cas mortels, se voient chez les filles, dont les vêtements ont ordinairement une coupe dégagée et flottante. Les résultats de l'analyse de la régression multiple confirment qu'un tel style, par opposition à la coupe ajustée, est relié de manière significative à la gravité des brûlures, à la durée d'hospitalisation, au besoin de greffe cutanée et à la survie. Le seul autre facteur important est le fait pour l'enfant de s'être soustrait à la surveillance de ses parents au moment de l'accident. À la lumière des bons résultats obtenus en d'autres pays, par voie de règlements, dans la prévention des brûlures graves par des vêtements, on discute de ce qui pourrait être fait au Canada en ce domaine.

With the exception of vehicular mishaps, fires and burns are the leading causes of death in children 1 to 4 years of age and the second most common cause in those 5 to 14 years of age.[1] In addition, burn victims represent the most difficult problems medically, financially and emotionally.[2-16]

Reviews of childhood thermal injuries most often report a higher incidence among boys[17-30] than among girls.[31,32] Scalds (from hot liquids) are more frequently implicated as the cause[18,20-22,25-31,33-35] than burns (from flames).[17,19,32,36] Nevertheless, burn injuries have tended to be more severe than scald injuries.[17-20,22,25-27,31-33,36,37] Among the most severe burns are those resulting from the ignition of clothing, as reflected by the high mortality rates associated with this type of thermal injury.[1-4,17-21,25-27,31-33,36-40] The garments responsible for the most severe burns are loose and flowing nightgowns.[20,32,36] Despite this hazard's being documented elsewhere,[20,32,36] an advisory committee to Consumer and Corporate Affairs Canada (CCAC) cited the lack of Canadian statistics on clothing burns in children as a major impedance to the introduction of corrective measures.[41]

In 1981–82 my colleagues and I performed a study to derive a national annual incidence rate of clothing burns in children admitted to tertiary care pediatric hospitals. In this paper I document the circumstances surrounding the burns, including the type and style of clothing involved, in order to identify potentially modifiable factors in the injurious process. In addition, I examine possible preventive strategies based on the results of our study.

Methods

Using the "Canadian Hospital Directory",[42] we identified the university-affiliated pediatric training centres that treat childhood burns. We then sent a letter to each centre, requesting information for the last 5 years on the circumstances surrounding each such injury: the age and sex of the child, the time of day and the season, the type of clothing involved (daywear or sleepwear) and its style (snug or loose and flowing), and the "ignition situation" (whether an adult had been present or had been intentionally avoided by the child). We also requested information on the injury: the extent and severity of the burn, the length of initial and subsequent stays in hospital, the need for skin grafting and whether the child recovered.

As in other reviews of clothing burns,[43] cases involving major conflagrations, such as car or house fires, as well as those involving clothing that had been contaminated with a flammable substance were excluded.

Initial bivariate statistical analysis was performed with chi-square and *t*-tests.[44] To more precisely determine the relation between the circumstances surrounding the injury and the severity of the burn, the length of hospital stay and so forth, step-wise multiple-regression analysis was also used.[44] This technique allowed us to examine the effect of each of the circumstances on a selected outcome variable while we controlled for every other circumstance.[44] The findings were deemed statistically significant at $p < 0.05$.

Results

Of the 13 university-affiliated pediatric training cen-

From the Department of Social and Preventive Medicine and the Department of Pediatrics, University of Manitoba, and the Department of Pediatrics and Child Health, Winnipeg Children's Hospital

Reprint requests to: Dr. Richard S. Stanwick, Department of Social and Preventive Medicine, S112–750 Bannatyne Ave., Winnipeg, Man. R3E 0W3

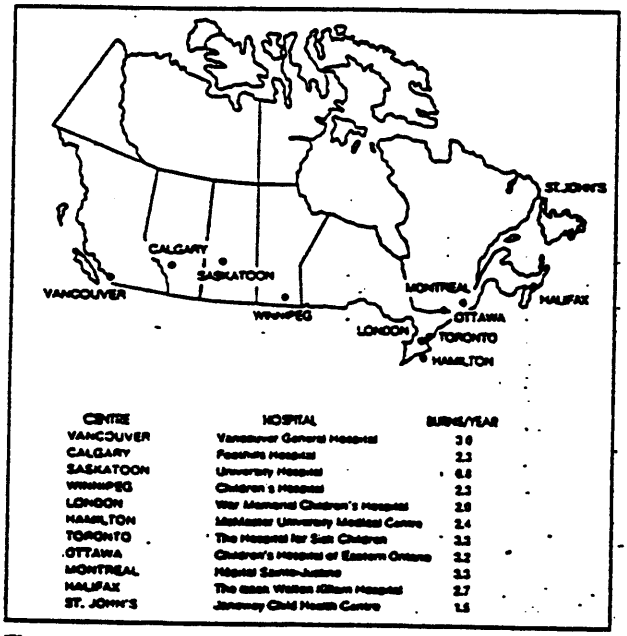
tres we identified, 11 (Fig. 1) provided the information requested in the letter, for a response rate of 85%. According to the 1981 Census of Canada[45] these hospitals are the major referral centres for their respective regions and serve nearly 60% of Canada's children. The most severe burns were therefore likely to be represented in our series. This "selection bias"[46] was intentional, since our study focused on the most severe injuries, not on the entire spectrum of childhood clothing burns in Canada. However, not all of the children with the most severe clothing burns could be identified; those who died in regional medical centres before being transferred or even before reaching a hospital would not be included in the medical records forwarded by the participating tertiary care centres.

The annual incidence rate of clothing burns in children up to 9 years of age admitted to tertiary care pediatric centres, derived from the local frequencies and based on the population of the respective catchment areas,[45] was 1.02/100 000. When this figure was applied to the Canadian population of children in this age group[45] the estimated annual number of children admitted to tertiary care pediatric centres for treatment of clothing burns is 37. Sleepwear accounts for an estimated 21 clothing burns per year (Fig. 2).

A total of 192 cases of clothing burns were reported by the 11 hospitals. Since some of the hospitals provided reviews that were done over longer periods than others or served larger catchment areas, their experiences with clothing burns are disproportionately depicted in the cumulative data in Fig. 3; the data should be interpreted in light of this bias.

We excluded from our analysis of the type of clothing involved 13 cases for which this information was not in the medical records and 5 cases that had involved blankets. Of the remaining 174 children, more girls than boys (100 v. 74) had suffered clothing burns, and 8 of the 9 children who died were girls. A total of 105 (60%) of the burns involved sleepwear (Fig. 3). Whereas the number of clothing burns involving daywear and sleepwear were evenly distributed among the boys (38 and 36, respectively), there were more than twice as many burns involving sleepwear among the girls (69 v. 31), a statistically significant difference ($\chi^2 = 6.54$, 1 degree of freedom, $p < 0.01$).

When the style of clothing was examined none of the 38 boys had suffered burns associated with loose and flowing daywear, but 4 of the 36 boys whose burns were associated with sleepwear had been wearing loose and flowing nightshirts. Among the girls, snug daywear (slacks, shorts, blouses and T-shirts) was involved in 11 cases, and loose and flowing daywear (dresses) was



CENTRE	HOSPITAL	BURNS/YEAR
VANCOUVER	Vancouver General Hospital	3.0
CALGARY	Foothills Hospital	2.1
SASKATOON	University Hospital	0.8
WINNIPEG	Children's Hospital	2.3
LONDON	War Memorial Children's Hospital	2.0
HAMILTON	McMaster University Medical Centre	2.4
TORONTO	The Hospital for Sick Children	3.3
OTTAWA	Children's Hospital of Eastern Ontario	2.2
MONTREAL	Hôpital Sainte-Justine	3.3
HALIFAX	The Izaak Walton Killam Hospital	2.7
ST. JOHN'S	Janeway Child Health Centre	1.5

Fig. 1—Participating hospitals and the annual frequency of clothing burns in children up to 9 years of age admitted to each.

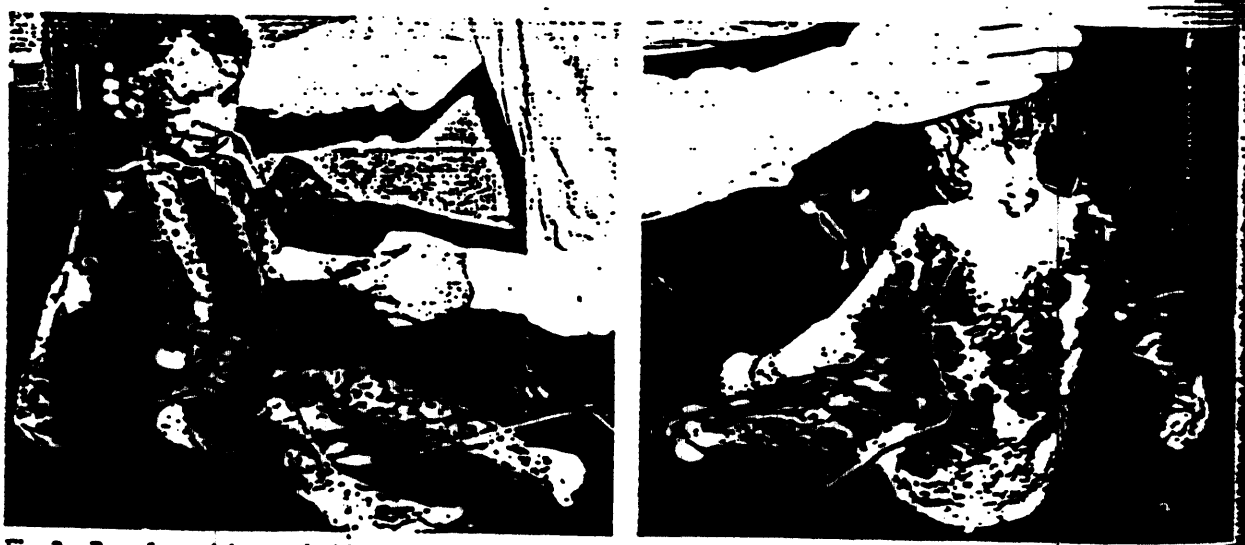


Fig. 2—Burn from nightgown ignition on 2-year-old girl. She had been helped by her 4-year-old sister onto a gas stove to reach a box of cookies. Her nightie trailed in the flame of the lit back element and ignited. Her father, who had been in the next room, immediately tore the garment off the child and immersed her in cool water. She suffered a 75% third-degree burn despite her father's efforts and died 6 weeks later. A garment identical to the one she had been wearing passed the current Canadian regulatory standard for children's clothing.

involved in only 13. On the other hand, 47 burns involved loose and flowing sleepwear (nightgowns, bath robes and dressing gowns), whereas only 22 involved snug sleepwear (pyjamas) ($\chi^2 = 5.06$, 1 degree of freedom, $p < 0.05$).

The number of burns was evenly distributed between the children aged up to 4 years (83) and those aged 5 to 9 years (91) (Fig. 3). As well, the proportions of burns involving daywear and sleepwear were similar in the two age groups.

We divided the "ignition situations" for all 192 children into two general groups: (a) those in which the child had likely been supervised by an adult (e.g., at campfires or barbeques or around open fireplaces), and (b) those in which the child had intentionally avoided a parent in order to pursue a perilous activity (e.g., climbing on a stove or playing with matches). There was no significant difference in ignition situation between the boys and the girls: 77% of the boys and 80% of the girls had intentionally avoided parental supervision.

Of the 192 children only 22 did not have a third-degree burn that required skin grafting. Most of the burns covered less than 10% of the total body surface area (TBSA), and full-thickness damage involved less than 5% of the TBSA. However, 10% of the children had third-degree burns involving more than 25% of their TBSA. As expected, these children required the greatest number of grafting procedures and had the longest hospital stays. More than 50% of the 192 children were in hospital for more than 40 days and 20% for more than 100 (extremes, 1 and 273; mean, 55.3) days.

With respect to outcome, bivariate analysis showed that both the style of clothing involved (loose and flowing) and the ignition situation (avoidance of adult supervision) were statistically significantly associated with more severe burns, longer stays in hospital, a larger number of skin grafts and less likelihood of survival. While age was not a predictive factor for any of the measures we used to quantify the magnitude of the injury, the sex of the child (female) and the type of clothing involved (sleepwear) were significantly associated with more extensive and severe burns, as in Fig. 2. However, when we used step-wise multiple-regression analysis, which allowed other influences to be controlled for, the style of clothing involved (loose and flowing) was the most powerful predictor of burn severity ($p < 0.001$) (Table I). The only other significant factor was ignition situation (avoidance of adult supervision) ($p < 0.01$). Similarly, the style of clothing involved (loose and flowing) and the ignition situation (avoidance of adult supervision) were the only signifi-

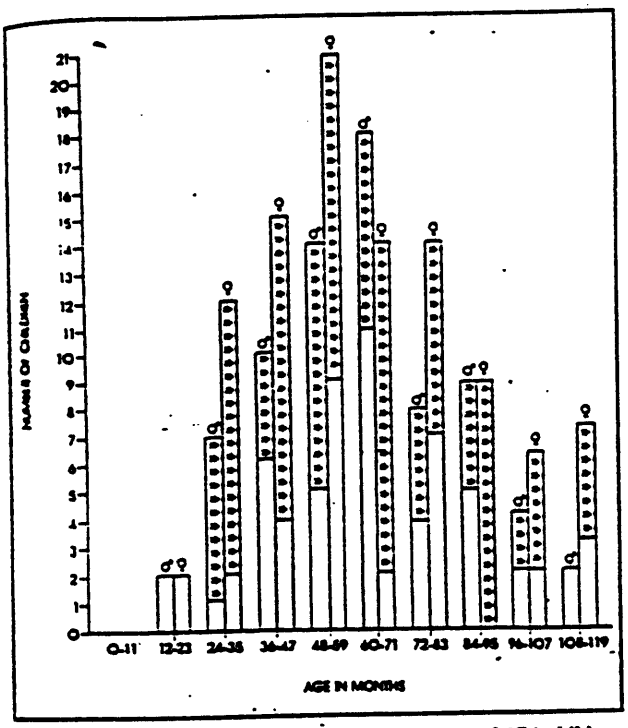


Fig. 3—Frequency distribution of age and sex of 174 children with clothing burns. Blank areas represent those in daywear, stars those in sleepwear at the time of injury.

Table I—Results of step-wise multiple-regression analysis to determine influence of independent variables on factors related to clothing burns

Factor; variable*	Standard β†	r^2	F	p level
Extent and severity of burn				
Style of garment	0.40	0.15	20.31	< 0.001
Ignition situation	0.23	0.06	7.05	< 0.01
Length of hospital stay				
Style of garment	0.53	0.28	41.72	< 0.001
Ignition situation	0.23	0.05	7.99	< 0.01
Need for skin grafting				
Style of garment	0.43	0.17	23.43	< 0.01
Ignition situation	0.22	0.05	6.08	< 0.05
Outcome (death)				
Style of garment	0.24	0.06	6.57	< 0.01
Ignition situation	0.20	0.04	4.67	< 0.05

*Ignition situation was interpreted as whether the child was likely to have been supervised or had intentionally avoided adult supervision at the time of injury.
†Predictors with a standardized β of less than 0.10 — the child's age and sex, the time of day and the season in which the injury occurred, and the type of garment — have been excluded.

cant predictors of length of hospital stay, the need for skin grafting and outcome (Table I).

Discussion

At least 37 Canadian children every year require admission to a tertiary care centre for treatment of clothing burns, sleepwear being involved in more than half the cases. As has been demonstrated with hot water scalds,[47] another serious public health hazard in Canada, the lack of a comprehensive and representative system of reporting childhood injuries has allowed the current high frequency and severity of clothing ignitions and other serious problems to go unchecked. In fact, the establishment of a national reporting system for childhood injuries was the first recommendation in the section on accidents in the 1979 report of the Canadian Commission for the International Year of the Child.[48]

As has been shown in this and other studies (and as suspected by CCAC from its compilation of isolated public complaints about clothing ignitions to regional offices[49]), clothing ignition is more frequent among girls than boys,[17-21,25-27,31-33,36-40,50] and the increased severity of such burns is underscored by the significantly greater number of fatal clothing burns among girls.[17-21,25,26,31,32,36-40,50] Furthermore, previous studies have suggested that girls are at a greater risk of such injuries because of the loose and flowing style of their clothing.[17-19,31,32,36,39,50] While our results of multiple-regression analysis confirmed the observation that a loose and flowing style is the most important predictor of burn severity, we also found that boys were just as likely as girls to suffer more significant thermal injuries when wearing such clothing.

Although girls wear loose and flowing garments more often than boys (60 v. 4 did in our study) and therefore have a correspondingly higher proportion of severe burns, regulatory action on apparel style should apply to both girls and boys. Such garments are associated with more severe burns because they are much more likely than snug garments to swing away from the wearer and come in contact with an ignition source, such as an open fireplace or a stove element.[39,51,52] Their larger surface area also increases the probability of fabric ignition when a child is playing with matches or a lighter. Moreover, once a loose and flowing garment ignites, the ensuing conflagration is much more intense and extensive since flame propagation is enhanced by oxygen on both sides of the fabric.[39,51,53] Snug garments, however, limit the oxygen supply[39,53] and, as demonstrated in our study, are thus associated with less severe burns.

As has been observed in girls in other studies,[20,32,36] we found that loose and flowing sleepwear accounted for more burns than this type of daywear (47 v. 13). That this is more apparent in girls than boys may be related to prevailing fashions and trends.[40]

Although we did not address type of fabric in our study, other authors have found that loose and flowing cotton garments are the most lethal.[33,51,53-55] Cotton and cotton/synthetic blends are the fabrics most often used in Canada for children's sleepwear.[41] On the basis of this information and anecdotal CCAC reports of burns for which fabric testing was performed,[49] it appears that cotton is the fibre most frequently involved in severe clothing burns.

Given the age distribution of the children in our study and that the current Canadian standards for children's clothing apply only up to size 6X,[41] it is apparent that new, more rigorous standards should be established and that they should apply up to size 14X.[41,56]

In our study and others[40,53] situations in which children of either sex avoided adult supervision in order to pursue perilous activities were associated with more severe burns. This observation underscores the difficulties of active prevention.[57] While consumer education of parents as to clothing flammability and childhood risk-taking does have a role,[58] education alone is not enough.[40,59,60] In our study the worst burns occurred in the children who succeeded in avoiding their parents. Since the results of experimentation and actions by inexperienced children cannot always be foreseen, some form of passive prevention[57] needs to be built into children's garments. A number of countries have passed legislation requiring that fabrics used for children's apparel have low flammability potential. The enactment of such a measure, especially for girls,[61] has reduced the number of severe burns in both the United States[40,62] and Great Britain.[61,62]

Unfortunately, in the process of meeting the original revised standard in the United States,[43] flame-retardant chemicals were added to fabrics used in the manufacture of children's clothing.[1] Although questions were raised as to the carcinogenicity of the chemicals,[63,64] serious methodologic flaws were identified in the preliminary studies,[65] so the definitive research on carcinogenicity was never completed.[66] The use of existing fabrics that have intrinsic flame-resistance properties has meant that rigorous standards are now being met in the United States without the use of chemical flame retardants.[67] Natural animal fibres (wool and silk) and certain synthetics (pure nylon and polyester) are difficult to ignite.[53] Nylon and polyester do not propagate the spread of flames because their melting temperature is above most ignition temperatures in domestic settings.[52,67] Moreover, when nylon or polyester does melt, it tends to pull away from the ignition source.[52,53,67] When molten material drips on a victim and causes a burn the TBSA involved is small. In addressing the depth of burns associated with clothing ignition, Pakkala[53] developed a composite scale that considered not only the depth but also the extent of thermal injuries. Fabric testing was performed on a manikin from which detailed sensor readings of burn severity could be obtained. Pure nylon and polyester and, to a slightly lesser extent, wool and silk were associated with very low scores (i.e., only minor burns) when ignited. However, when cotton and cotton/synthetic blends were ignited they were associated with extremely high scores and in a real situation would have resulted in severe, life-threatening burns.[33,51,53-55]

Australia and New Zealand have recently produced upgraded clothing standards but have not yet evaluated their impact on the frequency and severity of burns.[52] In addition to establishing more rigorous flammability standards, these countries have implemented the use of labels with large capital letters as to potential flamma-

bility on sleepwear for children aged up to 14 years, as follows:

- "Low fire danger" (on garments made from domestic fabrics with flame-resistant properties).
- "Designed to reduce fire danger. Flammable fabric" (on garments designed to reduce flammability).
- "Warning. High fire danger. Keep away from fire" (also shows flame within a triangle) (on garments that do not comply with the above points).

Australia has also instituted modifications in the design of children's sleepwear that is still made from flammable fabrics. Because style can significantly influence flammability,[40] the standard disallows loose and flowing garments and mandates closer-fitting, and therefore safer, garments[52] (Fig. 4).

Canada's current standard disallows the most dangerous fabrics; however, these highly flammable fabrics are not generally used in the manufacture of clothing.[67] Therefore, the present standards cannot be expected to have an impact on the frequency and severity of most clothing burns.

Were Canadian standards to change, consumer resistance would not likely be significant.[59] Wall,[60] in a report to the Minister of CCAC, showed that Canadian consumers would not be averse to sleepwear styles such as those adopted by Australia and New Zealand.[52] However, an education program would be needed before labelling as to flammability on children's clothing could be introduced.[59,60]

When given the choice consumers have indicated a preference for flame retardance over other fabric attributes, such as low cost and machine washability.[68] The Consumers' Association of Canada has formally endorsed a move toward more rigorous flammability standards for children's clothing.[56] One concern, however, is that flame-resistant garments may be more expensive.[67] While an increase in cost would be a strain on less advantaged Canadians, epidemiologic research on burns shows that this segment of the population would benefit most from more rigorous standards since they are the ones who are most likely to have fire-related mishaps.[33,69–73]

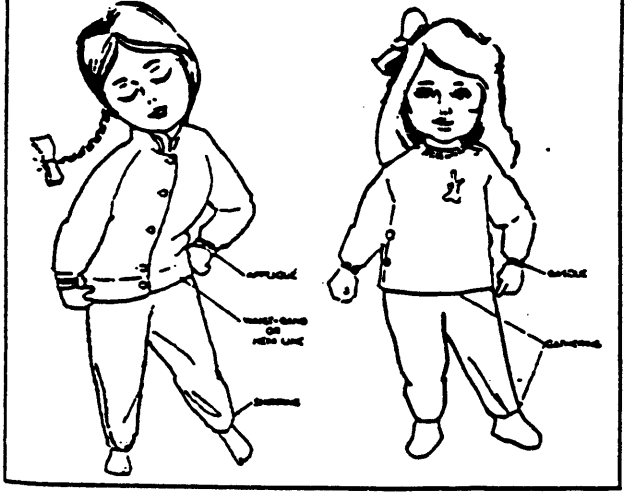


Fig. 4—Snug styles mandated in Australia for sleepwear made from potentially flammable fabrics.[52]

The introduction of new, more rigorous standards may not be associated with a dramatic decrease in the total number of cases of clothing burns in children in Canada. However, as has been demonstrated in countries with higher clothing standards,[41,43,61,62] there could be a significant reduction in the number of children with severe, often life-threatening, clothing burns who require referral to tertiary care centres, such as those in our study.

It is the public's perception that the provision of safe clothing for Canadian children is the responsibility of government and industry.[59] CCAC has accepted this responsibility, as shown by the current clothing standards, which eliminate the most dangerous fabrics from the marketplace and thus provide a small element of "passive" prevention for the public. Also, in 1974 a committee with broad representation was formed by CCAC and charged with recommending more rigorous standards.[41] The main reason cited by the committee for being unable to fulfil its mandate was the lack of nationwide data on clothing burns in children.[41] (The only Canadian information available to the committee was from studies from one centre[35,36,74] and was therefore not considered representative. Moreover, the studies did not address all the epidemiologic issues under consideration by the committee.) With the information from our study and its own field reports from the last 10 years[59] CCAC now has the required data and has reactivated the committee, inviting participation from all the organizations that were represented in 1974. This advisory body should now be able to ultimately bring about the necessary strengthening of the current clothing standards. It is also hoped that Canadian industries will follow the lead of their American counterparts[75] in accepting a new, more rigorous standard of safety.[63]

Thus, now that the means to reduce the severity of thermal injuries associated with clothing ignition is available, the current epidemiologic trends must be curtailed. Children deserve the best of health care, be it preventive or curative.

I thank Drs. Ted Logan and Elizabeth S. Hillman, St. John's; Drs. John P. Anderson and Richard B. Goldbloom, Halifax; Ms. Lucie Hille and Dr. Jean-Yves Frappier, Montreal; Ms. Francine Fell and Dr. William Feldman, Ottawa; Drs. Mary J. Duncan and Ronald M. Zuker, Toronto; Drs. Jose C. Venturelli-Baron and Peter B. Dent, Hamilton, Ont.; Mrs. Maureen Campbell and Dr. James Boon, London, Ont.; Dr. Brian F. Habbick, Saskatoon; Ms. Beverley Hrenewick and Dr. Robert H.A. Haslam, Calgary; Drs. Robert L. Wishart and Charles F.T. Snelling, Vancouver; and Drs. Richard Viau and Elizabeth Neilson, from the Flammability Division, Product Safety, CCAC, for the data they kindly provided. Special thanks go to the staff of the Burn Unit and the Medical Records Department of the Winnipeg Children's Hospital and to Dr. David Fish, for his thoughtful review of the manuscript.

This study was supported in part by a grant from the Children's Hospital of Winnipeg Research Foundation Inc. The opinions, conclusions and proposals in this article are those of the author and do not necessarily represent those of the foundation. I was supported in part by National Health Research and Development Award 6607-1196-47 from the Research Program Directorate, Department of National Health and Welfare.

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Place and city
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June

June 16–20, 1985

48th annual meeting of the Canadian Association of Radiologists
Hilton Harbour Castle Hotel, Toronto
Canadian Association of Radiologists, Ste. 806, 1440 Ste. Catherine St. W, Montreal, PQ H3G 1R8; (514) 866-2035

continued on page 1155

Attachment 3

Market Data 1992-98

Summary -- Children's Sleepwear Project (Includes Infants)

Cotton 480-lb. Bales

		92	93	94	95	96	97	98
Boys	*Pajamas*	6,780	6,291	12,623	18,160	22,693	26,441	31,097
Girls	*Sleepwear*	13,939	21,735	27,002	26,510	36,945	43,381	41,897
Infants	*Sleepwear*	1,716	1,921	2,003	2,160	4,079	6,295	8,480
Totals		22,435	29,947	41,628	46,830	63,657	76,117	81,474

Cotton's Increase in Childrens' Sleepwear Market	Bales	% Increase in Cotton
Cotton increase in total children's sleepwear (infants, girls & boys) from 95 -- 98:	34,644	74%
Cotton's increase in total children's sleepwear (infants, girls & boys) from 96 -- 98:	17,817	28%
Cotton's increase in infant sleepwear from 95 -- 98	6,320	293%
Cotton's increase in infant sleepwear from 96 -- 98	4,401	108%

Year over year increase 97 vs. 98--Infants	35%
Year over year increase 97 vs. 98--Childrens	7%

Total Fiber 480-lb. Bales

		92	93	94	95	96	97	98
Boys	*Pajamas*	96,586	87,085	99,339	103,079	106,811	107,251	111,407
Girls	*Sleepwear*	111,186	122,205	132,978	132,385	135,412	148,814	146,163
Infants	*Sleepwear*	23,869	23,060	22,185	23,082	26,019	32,533	35,651
Totals		231,641	232,350	254,502	258,546	268,242	288,598	293,221

Total Fiber's Increase in Childrens' Sleepwear Market	Bales	% Increase in Total Fiber
Ttl. Fiber's increase in total children's sleepwear (infants, girls & boys) from 95 -- 98:	34,675	13%
Ttl. Fiber's increase in total children's sleepwear (infants, girls & boys) from 96 -- 98:	24,979	9%
Total Fiber's increase in infant sleepwear from 95 -- 98	12,569	54%
Total Fiber's increase in infant sleepwear from 96 -- 98	9,632	37%

Source: Cotton Incorporated Analysis based on consumer data from NPD

The following are included in girls' playwear: Blouses, shirts, sweaters, vests, slacks/pants, overalls/coveralls, jeans, shorts, sweat apparel, skirts, and dresses.

Underwear includes panties, thermalwear, and daywear.

Sleepwear includes pajamas, gowns, sets, and other nightwear.

SLEEPWEAR

COTTON (Bales)	1992	1993	1994	1995	1996	1997	1998
Infants	1,716	1,921	2,003	2,160	4,079	6,295	8,480
Girls to Age 7	2,261	4,321	8,172	10,590	13,649	20,936	19,960
Girls 8 - 13	11,678	17,414	18,830	15,920	23,296	22,445	21,937
Boys to Age 7	4,315	3,711	8,592	14,605	18,115	21,902	24,377
Boys 8 - 14	2,465	2,580	4,031	3,555	4,518	4,539	6,720
TOTAL SLEEPWEAR	22,435	29,947	41,628	46,830	63,657	76,117	81,474

TTL FIBER (Bales)	1992	1993	1994	1995	1996	1997	1998
Infants	23,869	23,080	22,185	23,082	26,019	32,533	35,651
Girls to Age 7	74,452	80,349	92,439	98,854	92,744	105,600	101,856
Girls 8 - 13	36,734	41,856	40,539	36,531	42,668	43,214	44,307
Boys to Age 7	79,797	70,473	79,678	86,040	87,373	90,628	93,835
Boys 8 - 14	16,789	16,612	19,661	17,039	19,438	16,623	17,572
TOTAL SLEEPWEAR	231,641	232,350	254,502	258,546	268,242	288,598	293,221

% COTTON	1992	1993	1994	1995	1996	1997	1998
Infants	7.2%	8.3%	9.0%	9.4%	15.7%	19.3%	23.8%
Girls to Age 7	3.0%	5.4%	8.8%	10.9%	14.7%	19.8%	19.6%
Girls 8 - 13	31.8%	41.6%	46.4%	44.8%	54.6%	51.9%	49.5%
Boys to Age 7	5.4%	5.3%	10.8%	17.0%	20.7%	24.2%	26.0%
Boys 8 - 14	14.7%	15.5%	20.5%	20.9%	23.2%	27.3%	38.2%
TOTAL SLEEPWEAR	9.7%	12.9%	16.4%	18.1%	23.7%	26.4%	27.8%

Source: Cotton Incorporated Analysis based on consumer data from NPD
The following are included in girls' playwear: Blouses, shirts, sweaters, vests, slacks/pants, overalls/coveralls, jeans, shorts, sweat apparel, skirts, and dresses.
Underwear includes panties, thermalwear, and daywear.
Sleepwear includes pajamas, gowns, sets, and other nightwear.

UNDERWEAR

COTTON (Bales)	1992	1993	1994	1995	1996	1997	1998
Infants	15,854	15,044	16,887	17,799	20,141	20,575	23,688
Girls to Age 7	25,395	24,567	29,519	29,766	32,555	34,680	32,688
Girls 8 - 13	16,245	16,626	20,066	21,018	23,243	26,479	25,499
Boys to Age 7	36,307	36,444	37,673	39,109	42,642	46,610	42,714
Boys 8 - 14	31,941	33,199	37,713	36,814	39,928	42,383	45,500
TOTAL [redacted]	125,542	125,880	141,878	144,506	158,509	170,727	170,089

TTL FIBER (Bales)	1992	1993	1994	1995	1996	1997	1998
Infants	17,088	16,183	17,879	18,974	21,391	21,665	24,921
Girls to Age 7	29,102	28,130	32,818	32,596	34,881	36,537	34,276
Girls 8 - 13	19,605	20,008	23,205	24,040	25,824	29,076	27,788
Boys to Age 7	40,418	40,485	41,675	42,792	48,772	51,442	46,833
Boys 8 - 14	34,803	36,721	41,676	41,423	45,263	47,094	50,888
TOTAL [redacted]	141,016	141,527	157,253	159,825	174,121	185,814	184,706

% COTTON	1992	1993	1994	1995	1996	1997	1998
Infants	91.6%	93.0%	94.5%	93.8%	94.2%	95.0%	95.1%
Girls to Age 7	87.3%	87.3%	89.9%	91.3%	93.3%	94.9%	95.4%
Girls 8 - 13	82.9%	83.1%	86.6%	87.4%	90.0%	91.1%	91.8%
Boys to Age 7	89.8%	90.0%	90.4%	91.4%	91.2%	90.6%	91.2%
Boys 8 - 14	91.8%	90.4%	90.5%	88.9%	88.2%	90.0%	89.4%
TOTAL [redacted]	89.0%	88.9%	90.2%	90.4%	91.0%	91.9%	92.1%

Source: Cotton Incorporated Analysis based on consumer data from NPD
The following are included in girls' playwear: Blouses, shirts, sweaters, vests, slacks/pants, overalls/coveralls, jeans, shorts, sweat apparel, skirts, and dresses.
Underwear includes panties, thermalwear, and daywear.
Sleepwear includes pajamas, gowns, sets, and other nightwear.

INFANT SLEEPWEAR, UNDERWEAR, PLAYWEAR

		TOTAL (000) UNITS	TOTAL (000) DOLLARS	TOTAL FIBER BALES	COTTON BALES	COTTON SHARE (%)	100% COTTON (000) UNITS	100% COTTON BALES
Sleepwear	1992	29,930	$160,797	23,869	1,716	7.2%	1,579	1,344
	1993	28,416	$165,328	23,060	1,921	8.3%	1,849	1,445
	1994	27,842	$153,709	22,185	2,003	9.0%	1,612	1,383
	1995	29,233	$163,322	23,082	2,160	9.4%	1,964	1,699
	1996	33,219	$195,955	26,019	4,079	15.7%	3,959	3,531
	1997	40,869	$221,476	32,533	6,295	19.3%	6,306	5,470
	1998	43,798	$260,850	35,651	8,480	23.8%	8,517	7,465
Underwear	1992	57,067	$139,255	17,088	15,654	91.6%	46,145	13,828
	1993	54,104	$142,425	16,183	15,044	93.0%	44,336	13,271
	1994	59,716	$147,950	17,879	16,887	94.5%	51,420	15,410
	1995	63,270	$162,373	18,974	17,799	93.8%	52,606	15,771
	1996	71,415	$200,901	21,391	20,141	94.2%	61,613	18,469
	1997	72,465	$215,129	21,665	20,575	95.0%	64,619	19,395
	1998	83,142	$248,897	24,921	23,688	95.1%	72,725	21,805
Playwear*	1992	118,903	$1,047,569	103,538	63,979	61.8%	38,564	35,579
	1993	132,205	$1,115,794	115,941	73,716	63.6%	45,068	42,786
	1994	149,190	$1,219,864	131,629	85,213	64.7%	53,765	49,049
	1995	150,784	$1,216,254	133,027	89,903	67.6%	61,389	57,195
	1996	172,385	$1,422,443	149,712	107,589	71.9%	83,290	74,025
	1997	203,394	$1,658,512	177,732	123,685	69.6%	97,552	87,076
	1998	208,471	$1,695,908	183,405	133,643	72.9%	109,308	98,810

*Sunsuits, shortalls, dresses, pants, coverall, rompers

Source: Cotton Incorporated Analysis based on consumer data from NPD

GIRLS SLEEPWEAR, UNDERWEAR, PLAYWEAR--THRU AGE 13

TOTALS

(000) UNITS	SLEEPWEAR	UNDERWEAR	PLAYWEAR
ANNUAL 92	54,690	191,525	731,081
ANNUAL 93	56,665	186,821	736,394
ANNUAL 94	63,963	219,615	765,261
ANNUAL 95	64,286	222,559	836,651
ANNUAL 96	67,141	240,087	848,100
ANNUAL 97	75,192	259,089	878,868
ANNUAL 98	72,212	244,990	896,694
(000) DOLLARS			
ANNUAL 92	421,330	280,536	6,511,253
ANNUAL 93	455,507	276,123	6,665,668
ANNUAL 94	492,114	316,734	6,678,158
ANNUAL 95	474,114	321,328	7,166,806
ANNUAL 96	533,788	336,833	7,456,489
ANNUAL 97	586,303	366,045	7,838,583
ANNUAL 98	532,102	334,069	8,269,662
TOTAL FIBER--BALES			
ANNUAL 92	111,186	48,767	916,190
ANNUAL 93	122,205	48,138	911,516
ANNUAL 94	132,978	56,023	944,513
ANNUAL 95	132,385	56,636	1,044,971
ANNUAL 96	135,412	60,705	1,071,963
ANNUAL 97	146,814	65,613	1,119,313
ANNUAL 98	146,163	62,064	1,169,120
COTTON FIBER--BALES			
ANNUAL 92	13,939	41,640	579,539
ANNUAL 93	21,735	41,193	585,943
ANNUAL 94	27,002	49,605	614,319
ANNUAL 95	26,510	50,784	694,817
ANNUAL 96	36,945	55,798	729,268
ANNUAL 97	43,361	61,159	742,579
ANNUAL 98	41,897	58,167	767,924
COTSHARE PERCENT			
ANNUAL 92	12.5%	85.5%	63.3%
ANNUAL 93	17.8%	85.6%	64.3%
ANNUAL 94	20.3%	88.5%	65.0%
ANNUAL 95	20.0%	89.7%	66.5%
ANNUAL 96	27.3%	91.9%	68.0%
ANNUAL 97	29.2%	93.2%	68.3%
ANNUAL 98	28.7%	93.8%	67.4%

GIRLS SLEEPWEAR, UNDERWEAR, PLAYWEAR--AGES 8-13

100% COTTON MARKET

(000) UNITS	SLEEPWEAR	UNDERWEAR	PLAYWEAR
ANNUAL 92	5,858	146,703	241,466
ANNUAL 93	8,769	147,291	268,477
ANNUAL 94	11,196	179,308	280,636
ANNUAL 95	10,997	188,174	332,804
ANNUAL 96	16,573	210,443	362,926
ANNUAL 97	20,049	232,994	381,390
ANNUAL 98	19,161	220,996	381,315
(000) DOLLARS SPENT ON 100% COTTON			
ANNUAL 92	67,725	186,245	2,521,568
ANNUAL 93	83,436	183,670	2,765,205
ANNUAL 94	107,252	217,710	2,847,486
ANNUAL 95	94,192	229,139	3,176,719
ANNUAL 96	142,018	250,781	3,449,282
ANNUAL 97	164,306	281,111	3,455,396
ANNUAL 98	149,510	261,180	3,736,372
COTTON FIBER--BALES--USED IN 100% COTTON			
ANNUAL 92	10,543	36,996	321,175
ANNUAL 93	17,556	37,239	348,966
ANNUAL 94	22,473	46,322	377,529
ANNUAL 95	22,445	47,469	437,886
ANNUAL 96	32,806	52,769	483,632
ANNUAL 97	36,864	58,606	493,187
ANNUAL 98	35,879	55,610	543,271

Source: Cotton Incorporated Analysis based on consumer data from NPD

The following are included in girls' playwear: Blouses, skirts, sweaters, vests, slacks/pants, overalls/coveralls, jeans, shorts, sweat apparel, skirts, and dresses.

Underwear includes panties, thermalwear, and daywear.

Sleepwear includes pajamas, gowns, sets, and other nightwear.

GIRLS SLEEPWEAR, UNDERWEAR, PLAYWEAR-- Up to & Including Age 7

TOTALS (000) UNITS	SLEEPWEAR	UNDERWEAR	PLAYWEAR
ANNUAL 92	36,373	113,535	433,649
ANNUAL 93	38,152	109,821	426,290
ANNUAL 94	43,635	127,912	438,964
ANNUAL 95	46,592	127,203	500,556
ANNUAL 96	45,836	136,951	504,348
ANNUAL 97	50,675	143,083	510,607
ANNUAL 98	48,372	134,656	515,470
(000) DOLLARS			
ANNUAL 92	$260,276	$162,984	$3,284,106
ANNUAL 93	$270,991	$156,012	$3,290,727
ANNUAL 94	$298,344	$185,744	$3,265,044
ANNUAL 95	$321,970	$182,940	$3,672,662
ANNUAL 96	$334,212	$187,262	$3,799,341
ANNUAL 97	$365,043	$197,101	$3,833,529
ANNUAL 98	$328,479	$181,674	$3,669,526
TOTAL FIBER--BALES			
ANNUAL 92	74,452	29,102	580,267
ANNUAL 93	80,349	28,130	534,539
ANNUAL 94	92,439	32,818	544,566
ANNUAL 95	98,854	32,596	621,546
ANNUAL 96	92,744	34,881	628,327
ANNUAL 97	105,600	36,537	637,782
ANNUAL 98	101,566	34,276	665,684
COTTON FIBER--BALES			
ANNUAL 92	2,261	25,395	327,369
ANNUAL 93	4,321	24,567	320,589
ANNUAL 94	8,172	29,519	333,315
ANNUAL 95	10,590	29,766	396,000
ANNUAL 96	13,549	32,555	414,460
ANNUAL 97	20,936	34,660	422,127
ANNUAL 98	19,960	32,668	442,062
COTSHARE PERCENT			
ANNUAL 92	3.0%	87.3%	59.5%
ANNUAL 93	5.4%	87.3%	60.0%
ANNUAL 94	8.8%	89.9%	61.2%
ANNUAL 95	10.9%	91.3%	63.7%
ANNUAL 96	14.7%	93.3%	66.0%
ANNUAL 97	19.8%	94.9%	66.2%
ANNUAL 98	19.6%	95.4%	67.4%

GIRLS SLEEPWEAR, UNDERWEAR, PLAYWEAR--AGES 0-7

100% COTTON MARKET (000) UNITS	SLEEPWEAR	UNDERWEAR	PLAYWEAR
ANNUAL 92	823	86,587	117,928
ANNUAL 93	1,614	87,004	124,759
ANNUAL 94	3,126	106,774	139,091
ANNUAL 95	4,232	108,128	172,707
ANNUAL 96	5,970	121,325	192,795
ANNUAL 97	6,297	131,856	196,286
ANNUAL 98	6,502	123,376	204,172
(000) DOLLARS SPENT ON 100% COTTON			
ANNUAL 92	$6,768	$119,488	$1,040,283
ANNUAL 93	$13,820	$108,286	$1,107,557
ANNUAL 94	$25,390	$136,995	$1,202,866
ANNUAL 95	$33,656	$132,348	$1,453,481
ANNUAL 96	$41,253	$142,350	$1,823,620
ANNUAL 97	$56,858	$161,458	$1,805,400
ANNUAL 98	$60,719	$145,962	$1,843,060
COTTON FIBER--BALES--USED IN 100% COTTON			
ANNUAL 92	1,691	22,490	156,732
ANNUAL 93	3,672	22,159	163,922
ANNUAL 94	7,173	27,121	179,883
ANNUAL 95	9,418	27,428	224,111
ANNUAL 96	12,151	30,622	250,159
ANNUAL 97	17,766	33,423	256,371
ANNUAL 98	17,545	31,160	277,737

Source: Cotton Incorporated Analysis based on consumer data from NPD

The following are included in girls' playwear: Blouses, shirts, sweaters, vests, slacks/pants, overalls/coveralls, jeans, shorts, sweat apparel, skirts, and dresses.

Underwear includes panties, thermalwear, and daywear.

Sleepwear includes pajamas, gowns, sets, and other nightwear.

GIRLS SLEEPWEAR, UNDERWEAR, PLAYWEAR--AGES 8-13

TOTALS	SLEEPWEAR	UNDERWEAR	PLAYWEAR
(000) UNITS			
ANNUAL 92	18,217	77,890	297,432
ANNUAL 93	20,433	79,200	310,104
ANNUAL 94	20,848	91,703	326,297
ANNUAL 95	17,694	95,356	336,095
ANNUAL 96	21,305	103,136	343,752
ANNUAL 97	24,517	116,006	368,261
ANNUAL 98	23,840	110,334	381,224
(000) DOLLARS			
ANNUAL 92	$171,054	$117,552	$3,227,145
ANNUAL 93	$184,516	$121,111	$3,374,941
ANNUAL 94	$193,770	$130,990	$3,413,114
ANNUAL 95	$152,144	$138,388	$3,493,846
ANNUAL 96	$199,576	$148,551	$3,657,148
ANNUAL 97	$220,260	$166,944	$4,006,054
ANNUAL 98	$208,623	$152,395	$4,374,136
TOTAL FIBER--BALES			
ANNUAL 92	36,734	19,605	365,923
ANNUAL 93	41,656	20,008	376,977
ANNUAL 94	40,539	23,205	399,957
ANNUAL 95	35,531	24,040	423,425
ANNUAL 96	42,668	26,824	443,636
ANNUAL 97	43,214	29,076	461,531
ANNUAL 98	44,807	27,788	513,436
COTTON FIBER--BALES			
ANNUAL 92	11,578	16,245	252,170
ANNUAL 93	17,414	16,626	265,354
ANNUAL 94	18,830	20,088	281,004
ANNUAL 95	15,920	21,018	298,817
ANNUAL 96	23,296	23,243	314,806
ANNUAL 97	22,445	26,479	320,452
ANNUAL 98	21,937	25,499	345,662
COTSHARE PERCENT			
ANNUAL 92	31.8%	82.9%	68.9%
ANNUAL 93	41.8%	83.1%	70.4%
ANNUAL 94	46.4%	86.8%	70.3%
ANNUAL 95	44.8%	87.4%	70.5%
ANNUAL 96	54.6%	90.6%	71.0%
ANNUAL 97	51.9%	91.1%	86.5%
ANNUAL 98	49.5%	91.8%	67.4%

GIRLS SLEEPWEAR, UNDERWEAR, PLAYWEAR--AGES 8-13

100% COTTON MARKET (000) UNITS	SLEEPWEAR	UNDERWEAR	PLAYWEAR
ANNUAL 92	4,835	58,116	123,557
ANNUAL 93	7,155	60,287	143,718
ANNUAL 94	8,070	72,534	160,647
ANNUAL 95	6,765	80,046	169,897
ANNUAL 96	10,703	89,118	169,291
ANNUAL 97	11,752	101,138	166,104
ANNUAL 98	10,679	97,610	177,143
(000) DOLLARS			
ANNUAL 92	$50,957	$77,757	$1,481,285
ANNUAL 93	$59,518	$77,404	$1,657,848
ANNUAL 94	$61,862	$86,715	$1,644,823
ANNUAL 95	$80,636	$96,793	$1,723,238
ANNUAL 96	$100,765	$108,431	$1,825,852
ANNUAL 97	$106,248	$119,653	$1,848,996
ANNUAL 98	$86,791	$115,198	$2,095,312
COTTON FIBER--BALES--USED IN 100% COTTON			
ANNUAL 92	6,852	14,506	162,443
ANNUAL 93	13,984	15,080	185,046
ANNUAL 94	15,300	18,201	197,836
ANNUAL 95	13,027	20,061	213,775
ANNUAL 96	20,455	22,147	233,473
ANNUAL 97	18,878	25,185	236,816
ANNUAL 98	18,334	24,430	265,534

Source: Cotton Incorporated Analysis based on consumer data from NPD

The following are included in girls' playwear: Blouses, shirts, sweaters, vests, slacks/pants, overalls/coveralls, jeans, shorts, sweat apparel, skirts, and dresses.

Underwear includes panties, thermalwear, and daywear.

Sleepwear includes pajamas, gowns, sets, and other nightwear.

Sleepwear

BOYS PLAYWEAR*, UNDERWEAR, PAJAMAS--THRU AGE 14

TOTALS (000) UNITS	PLAYWEAR	UNDERWEAR	Sleepwear PAJAMAS
ANNUAL 92	889,049	192,622	33,487
ANNUAL 93	911,911	195,345	29,989
ANNUAL 94	944,758	204,511	34,248
ANNUAL 95	934,406	210,808	36,819
ANNUAL 96	983,792	229,379	38,250
ANNUAL 97	1,018,758	242,838	36,002
ANNUAL 98	1,068,568	254,282	39,168
(000) DOLLARS			
ANNUAL 92	7,244,881	284,346	213,491
ANNUAL 93	7,488,765	309,178	196,844
ANNUAL 94	7,882,307	331,803	216,666
ANNUAL 95	7,496,951	378,026	219,275
ANNUAL 96	8,133,463	417,786	254,769
ANNUAL 97	8,797,330	454,340	260,504
ANNUAL 98	9,397,410	473,960	257,832
TOTAL FIBER--BALES			
ANNUAL 92	1,196,061	75,221	96,566
ANNUAL 93	1,216,938	77,206	87,085
ANNUAL 94	1,261,801	83,351	99,339
ANNUAL 95	1,248,841	84,215	103,079
ANNUAL 96	1,271,113	92,025	105,811
ANNUAL 97	1,337,577	96,536	107,251
ANNUAL 98	1,416,867	97,721	111,407
COTTON FIBER--BALES			
ANNUAL 92	775,684	68,248	6,780
ANNUAL 93	793,142	69,643	6,291
ANNUAL 94	837,872	75,386	12,623
ANNUAL 95	853,044	75,923	18,160
ANNUAL 96	896,988	82,570	22,633
ANNUAL 97	936,354	86,993	26,441
ANNUAL 98	1,005,822	88,214	31,097
COTSHARE PERCENT			
ANNUAL 92	64.7%	90.7%	7.0%
ANNUAL 93	65.2%	90.2%	7.2%
ANNUAL 94	66.4%	90.4%	12.7%
ANNUAL 95	68.3%	90.2%	17.6%
ANNUAL 96	70.6%	89.7%	21.2%
ANNUAL 97	70.2%	90.3%	24.7%
ANNUAL 98	71.0%	90.3%	27.9%

Sleepwear

BOYS PLAYWEAR*, UNDERWEAR, PAJAMAS

100% COTTON MARKET (000) UNITS	PLAYWEAR	UNDERWEAR	Sleepwear PAJAMAS
ANNUAL 92	376,335	292,625	85,492
ANNUAL 93	400,296	307,921	86,765
ANNUAL 94	460,070	334,649	97,025
ANNUAL 95	478,351	341,024	97,338
ANNUAL 96	520,626	362,128	104,885
ANNUAL 97	539,098	373,366	110,254
ANNUAL 98	578,190	397,932	118,970
(000) DOLLARS SPENT ON 100% COTTON			
ANNUAL 92	3,417,269	2,293,906	123,343
ANNUAL 93	3,724,606	2,590,576	133,254
ANNUAL 94	4,054,914	2,719,102	151,341
ANNUAL 95	4,274,656	2,747,671	176,785
ANNUAL 96	4,693,854	2,997,560	206,697
ANNUAL 97	5,051,895	3,169,181	223,568
ANNUAL 98	5,466,549	3,456,937	245,846
COTTON FIBER--BALES--USED IN 100% COTTON			
ANNUAL 92	496,584	293,936	32,219
ANNUAL 93	526,511	316,199	31,956
ANNUAL 94	574,649	345,368	39,878
ANNUAL 95	612,019	349,395	44,025
ANNUAL 96	659,855	375,042	50,931
ANNUAL 97	690,593	390,970	55,010
ANNUAL 98	745,368	415,867	59,427

Source: Cotton Incorporated Analysis based on consumer data from NPD
The following are included in boys' playwear: casual shirts, workshirts, sweaters, other tops, slacks/pants, workpants, overalls/coveralls, and jeans.

BOYS PLAYWEAR*, UNDERWEAR, PAJAMAS, UP TO & INCLUDING AGE 7

TOTALS	PLAYWEAR	UNDERWEAR	PAJAMAS / Sleepwear
(000) UNITS			
ANNUAL 92	506,601	98,716	27,173
ANNUAL 93	522,606	96,939	23,769
ANNUAL 94	531,643	95,157	27,208
ANNUAL 95	531,655	100,556	29,792
ANNUAL 96	545,638	109,049	30,679
ANNUAL 97	580,249	117,741	31,467
ANNUAL 98	591,478	117,618	32,155
(000) DOLLARS			
ANNUAL 92	$3,369,900	$144,639	$169,110
ANNUAL 93	$3,396,899	$147,427	$146,676
ANNUAL 94	$3,407,813	$151,234	$162,134
ANNUAL 95	$3,369,193	$171,391	$169,507
ANNUAL 96	$3,695,462	$183,295	$199,902
ANNUAL 97	$3,969,823	$205,816	$209,358
ANNUAL 98	$4,072,097	$190,840	$202,781
TOTAL FIBER--BALES			
ANNUAL 92	702,056	40,416	79,797
ANNUAL 93	716,706	40,485	70,473
ANNUAL 94	735,719	41,675	79,678
ANNUAL 95	736,302	42,792	86,040
ANNUAL 96	736,118	46,772	87,373
ANNUAL 97	780,546	51,442	90,628
ANNUAL 98	803,241	46,833	93,835
COTTON FIBER--BALES			
ANNUAL 92	416,972	36,307	4,315
ANNUAL 93	420,069	36,444	3,711
ANNUAL 94	436,857	37,673	8,582
ANNUAL 95	456,363	39,109	14,605
ANNUAL 96	477,456	42,642	18,115
ANNUAL 97	509,146	46,610	21,902
ANNUAL 98	534,137	42,714	24,377
COTSHARE PERCENT			
ANNUAL 92	59.4%	89.8%	5.4%
ANNUAL 93	58.6%	90.0%	5.3%
ANNUAL 94	59.4%	90.4%	10.8%
ANNUAL 95	62.0%	91.4%	17.0%
ANNUAL 96	64.9%	91.2%	20.7%
ANNUAL 97	65.2%	90.5%	24.2%
ANNUAL 98	66.5%	91.2%	26.0%

BOYS PLAYWEAR*, UNDERWEAR, PAJAMAS / Sleepwear

100% COTTON MARKET

(000) UNITS	PLAYWEAR	UNDERWEAR	PAJAMAS / Sleepwear
ANNUAL 92	173,429	89,719	1,166
ANNUAL 93	179,893	87,518	864
ANNUAL 94	204,063	88,642	2,290
ANNUAL 95	230,851	92,314	4,001
ANNUAL 96	255,820	97,322	5,635
ANNUAL 97	272,223	100,491	6,064
ANNUAL 98	285,363	105,125	6,818
(000) DOLLARS SPENT ON 100% COTTON			
ANNUAL 92	$1,258,184	$122,793	$9,814
ANNUAL 93	$1,308,140	$124,110	$7,515
ANNUAL 94	$1,464,879	$129,467	$17,356
ANNUAL 95	$1,673,112	$146,127	$27,332
ANNUAL 96	$1,845,574	$149,300	$39,526
ANNUAL 97	$2,052,470	$169,758	$47,022
ANNUAL 98	$2,167,340	$155,728	$45,546
COTTON FIBER--BALES--USED IN 100% COTTON			
ANNUAL 92	236,497	31,869	3,631
ANNUAL 93	242,693	31,761	2,678
ANNUAL 94	263,160	33,879	7,062
ANNUAL 95	297,516	34,892	11,862
ANNUAL 96	321,596	36,775	16,571
ANNUAL 97	349,486	38,865	18,961
ANNUAL 98	366,484	36,983	20,969

Source: Cotton Incorporated Analysis based on consumer data from NPD
The following are included in boys' playwear: casual shirts, workshirts, sweaters, other tops, slacks/pants, workpants, overalls/coveralls, and jeans.

BOYS PLAYWEAR*, UNDERWEAR, ~~PAJAMAS~~ AGES 8-14

TOTALS	PLAYWEAR	UNDERWEAR	Sleepwear ~~PAJAMAS~~
(000) UNITS			
ANNUAL 92	380,448	93,906	6,314
ANNUAL 93	389,306	98,406	6,220
ANNUAL 94	413,115	108,354	7,040
ANNUAL 95	402,751	110,252	6,527
ANNUAL 96	418,154	120,330	7,571
ANNUAL 97	438,509	125,097	6,535
ANNUAL 98	477,080	136,666	7,013
(000) DOLLARS			
ANNUAL 92	$3,874,961	$139,707	$44,361
ANNUAL 93	$4,091,866	$161,751	$49,968
ANNUAL 94	$4,164,494	$180,869	$56,432
ANNUAL 95	$4,097,756	$206,635	$49,766
ANNUAL 96	$4,478,001	$234,491	$60,867
ANNUAL 97	$4,827,507	$248,524	$51,146
ANNUAL 98	$5,325,313	$283,140	$55,051
TOTAL FIBER--BALES			
ANNUAL 92	496,025	34,803	16,789
ANNUAL 93	500,230	36,721	16,612
ANNUAL 94	526,062	41,676	19,661
ANNUAL 95	512,539	41,423	17,039
ANNUAL 96	534,995	45,253	19,436
ANNUAL 97	557,031	47,094	16,623
ANNUAL 98	613,626	50,888	17,572
COTTON FIBER--BALES			
ANNUAL 92	358,712	31,941	2,465
ANNUAL 93	373,073	33,199	2,580
ANNUAL 94	401,015	37,713	4,031
ANNUAL 95	396,681	36,814	3,555
ANNUAL 96	419,532	39,928	4,518
ANNUAL 97	429,208	42,383	4,539
ANNUAL 98	471,685	45,500	6,720
COTSHARE PERCENT			
ANNUAL 92	72.3%	91.8%	14.7%
ANNUAL 93	74.6%	90.4%	15.5%
ANNUAL 94	76.2%	90.5%	20.5%
ANNUAL 95	77.4%	88.9%	20.9%
ANNUAL 96	78.4%	88.2%	23.2%
ANNUAL 97	77.1%	90.0%	27.3%
ANNUAL 98	76.9%	89.4%	38.2%

BOYS PLAYWEAR*, UNDERWEAR, ~~PAJAMAS~~

100% COTTON MARKET (000) UNITS	PLAYWEAR	UNDERWEAR	Sleepwear ~~PAJAMAS~~
ANNUAL 92	202,906	84,326	812
ANNUAL 93	220,403	85,911	787
ANNUAL 94	246,007	94,735	1,444
ANNUAL 95	248,710	93,337	1,159
ANNUAL 96	264,806	99,130	1,584
ANNUAL 97	266,875	104,190	1,734
ANNUAL 98	292,807	112,152	2,442
(000) DOLLARS SPENT ON 100% COTTON			
ANNUAL 92	$2,161,105	$113,529	$6,129
ANNUAL 93	$2,415,466	$125,739	$8,853
ANNUAL 94	$2,599,835	$133,985	$14,840
ANNUAL 95	$2,601,544	$148,463	$11,838
ANNUAL 96	$2,848,280	$167,171	$14,708
ANNUAL 97	$2,999,425	$176,546	$15,694
ANNUAL 98	$3,301,209	$200,298	$21,174
COTTON FIBER--BALES--USED IN 100% COTTON			
ANNUAL 92	262,067	26,588	2,080
ANNUAL 93	284,418	29,276	1,768
ANNUAL 94	311,489	32,796	3,865
ANNUAL 95	314,503	32,163	2,861
ANNUAL 96	336,267	34,360	3,493
ANNUAL 97	341,105	36,049	3,778
ANNUAL 98	376,864	38,436	5,894

Source: Cotton Incorporated Analysis based on consumer data from NPD
The following are included in boys' playwear: casual shirts, workshirts, sweaters, other tops, slacks/pants, workpants, overalls/coveralls, and jeans.

Sleepwear Comment + Reported Incident CF99-1-131

C993 0023

Author: <rhenni@fire.co.fairfax.va.us> at INTERNET-MAIL
Date: 3/22/99 4:35 PM
Priority: Normal
TO: cpsc-os@cpsc.gov. at internet-mail
BCC: Todd A. Stevenson at CPSC-HQ1
Subject: (Fwd) Re: consumer Product Safety Commission

------- Forwarded Message Follows -------
From: Albert350@aol.com
Date sent: Mon, 22 Mar 1999 16:04:29 EST
To: rhenni@s92fsn1.co.fairfax.va.us
Subject: Re: consumer Product Safety Commission

Dear Sadye E. Dunn,

I know that you have received many letter regarding reinstating the sleepwear standard but if you only chose to pay attention to one, choose this letter. My name is Maria Leightley. I am a burn victim and a mother of a young daughter. These two identities continually shape my life and influence why I am imploring that you reinstate the sleepwear standard!

On June 24th, 1972, at three years of age, my life changed forever in one brief moment. I was wearing a nightgown that was made while there was not a sleepwear standard in effect. I was being a curious little kid and picked up a box of matches and lit one. My nightgown caught on fire and because it was not flame retardant, the fire instantly melted the fabric to my skin. By the time my mother was able to rescue me, over 35% of my body suffered second and third degree burns, including my face. So here I was at three years old, already marked for life as someone different.

Now think back to your childhood and teen-age years. Remember how difficult it could be to make friends; how difficult it could be to fit in with the popular crowd. Remember how much you wanted your peers to like and accept you. Remember how you wanted that someone special to fall in love with you. Remember teasing that one person who was different from you and your friends. Remembering thinking that someone was always watching you.

For most of us, those thoughts and difficulties were centered more in our imaginations then in reality. But not for me, someone whose body was covered in scars. My reality was that I did have a difficult time making friends and being accepted. I was that child that others singled out and ridiculed. I was not just imagining that everyone was looking at me; they really were.

Growing up is hard enough without the added hardship of having over one-third of your body scared. I can recall being ashamed to go to the beach because of having to wear a bathing suit. Thus winter being my favorite time of year; I could wear plenty of clothes to cover my body and wouldn't be questioned. I remember the agony of not wanting to go out for team sports because of the attire usually required that we wear. I remember gym class was a dreaded hour because we often had to change in front of each other. I had to expose my scars to other students, where I would be unprotected from the stares and whispers.

Twenty-seven years have passed since I was burned. I am no longer the child who often thought that I would have been better off dead. I've healed, but my scars are still there, including the scars that you can't see--the ones on my sole. Every aspect of my life has been touched by those flames that burned me when I was three. I had a difficult time with intimate relationships. Exposing yourself, physically and emotionally to any other person is difficult enough without the scars. I was able to overcome this and married a wonderful man who loves even the parts of me that aren't perfect. Later, when we found out that I was pregnant, even then my scars came back to haunt me. I could not experience all the joys of motherhood for which I had hoped. I had to worry the entire nine months if my stomach would be able to stretch enough for the baby to grow. To continue, breast feeding was out of the question.

My daughter, Ashley, is about the same age as I was when I was burned. I look at her and see a beautiful child. She has no scars externally, nor internally. I want to protect my child and other children from pain, whether

it is emctional or physical. I know that I will not be able to save my daughter pain in her life; it's a given. But, I will do my best to ensure her from NEEDLESS pain.

Reinstating the sleepwear standard is a way to protect Ashley and other children from unnecessary suffering. I thought I had succeeded in this when I shared my story last year with many national and local news stations. I hoped that someone would listen and change a law that would save someone's child from ever having to undergo the physical and mental agony that I suffered, but I was wrong.

I read a recent news article stating that "only eighty" children have been burned since the sleepwear standard has been taken out of effect???? To some, eighty may not seem like enough of a statistically significant number to change a law. So I ask you, what IS the magical number? When do you say, "Fine, enough children have been burned now, let's reinstate the law?"

To me, to my mother and father, and to my husband, the fact that one person was burned, Maria Leightley, is significant enough.

I told you that I speak from two view points, a mother and a burn victim, in imploring you to reinstate the sleepwear standard. However, the mother in me pleads the loudest. If the only way I could save my Ashley from being burned would be to go through June 24, 1972, and the following years again, I would not hesitate a moment longer than it took for the flames to melt my nightgown to my skin that fateful night. However, you have the power to protect her and all the other children. Please reinstate the sleepwear standard!

Sincerely,

Maria Leightley

Renee Henningsen
Fairfax County Fire and Rescue Department
703-246-3801

CF99-1-132

BILL LOCKYER
Attorney General

State of California
DEPARTMENT OF JUSTICE

Consumer Law Section
300 South Spring Street
5th Floor North Tower
Los Angeles, CA 90013-1232

Facsimile: (213) 897-4951
Phone: (213) 897-2630

March 22, 1999

Secretary,
Consumer Product Safety Commission
Washington, D.C. 20207
Fax: 301-504-0127

RE: Sleepwear Revocation

Dear Sirs,

The California Attorney General supports the letter sent on Friday March 19, 1999, to the Commission by the Connecticut Attorney General and the attorneys general of a number of other states. Although we were unable to join in that letter on Friday, we have read it and join in each of the positions stated therein.

Sincerely,

HERSCHEL T. ELKINS
Senior Assistant Attorney General

For BILL LOCKYER
Attorney General

cc: Connecticut Attorney General

CF99-1-134

Mar. 14, 1999

To: Office of The Secretary
Consumer Product Safety Commission

From: Polly Clark, 120 Bradford Place, Kennett, Mo 63857

Re: Sleepwear Revocation

I support the AAMA in recommending that the CPSC maintain the amendment allowing sale of snug-fitting untreated cotton products complying as sleepwear. The amendments do not relax safety considerations. Snug-fitting products still have to pass the general wearing apparel standard. Loose-fitting sleepwear is still required to pass a severe flame test.

Apparel manufactures and retailers have developed point-of-purchase education materials to inform parents about sleepwear products and the education and training programs will be continued and also improve.

The amendment allowing snug-fitting, untreated cotton products as children's sleepwear helps reduce confusion between what is considered sleepwear, underwear and playwear. It gives the consumer an informed choice to purchase cotton garments with their children's safety protected.

The amendment also allows consumers to choose

safer, snug-fitting garments rather than loose-fitting daywear, such as t-shirts and sweats.

I whole heartedly support the CPSC's decision to amend the Children's sleepwear flammability standards. This amendment gives the consumer safer sleepwear alternatives and the amendment should not be revoked!

CF99-1-135

PRESIDENT
Michael H. Vincent
734 E. Ivy Drive
Seaford, DE 19973
302-629-2396 (H)
302-629-2396 (W)
302-629-4381 (Fax)
302-855-6101 (Pager)

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302-995-0300 (W)
302-995-6330 (Fax)
800-823-7069 (Pager)

2nd VICE PRESIDENT
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Clayton, DE 19938-0361
302-653-9726 (H)
302-739-5665 (W)
302-739-3696 (Fax)
302-247-9002 (Pager)

SECRETARY
James E. Turner, III,
212 Washington Avenue
P.O. Box 232
Clayton, DE 19938-0232
302-653-8030 (H)
302-739-4773 ext. 212W)
302-739-6246 (Fax)
302-247-4773 (Pager)

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302-492-3755 (H)
302-739-4241 (W)
302-739-2723 (Fax)
302-247-5516 (Pager)

Past President, Director
Donald W. Knight, Sr.
35 Meadow Glen
Dover, DE 19901
302-697-2385 (H)
302-736-2218 (W)
302-736-2244 (FAX)
302-625-2374 (Pager)

Elected Directors:
Dale A. Callaway
Sussex County Director
302-684-8011 (H)
302-734-4811 (W)

[illegible] H. Lakey
New Castle County Director
302-834-7958 (H)
302-834-6223 (W)

Clarence R. O'Neal, Jr.
402-492-8599 (H)
302-577-4712 (W)
302-888-7213 (Pager)

DELAWARE VOLUNTEER FIREMEN'S ASSOCIATION

County Presidents
Tillo A. Suppe
New Castle County
302-738-5050 (H)
302-631-7143 (W)
302-247-3187 (Pager)

Marvin C. Sharp
Kent County
302-422-5421 (H)
302-422-9249 (W)
302-735-2854 (Pager)

Ronald H. Marvel
Sussex County
[illegible]
302-629-8595 (W)
302-854-3263 (Pager)

Chaplains
Rev. Robert Hudson
302-934-9874

Rev. David G. Paul
302-335-4148

March 19, 1999

Ms. Sadye E. Dunn
Secretary
Consumer Product Safety Commission
Washington DC 20207

Re: Sleepwear Revocation

Dear Ms. Dunn:

At the direction of President Michael H. Vincent, this Association submits this letter to support the revocation of the 1996 relaxed standards that placed children at a higher risk of burn injury. The reduction of infant burn injuries throughout the period that the standard was in place is more than enough evidence that the Commission's decision was misguided.

We join with the medical community, national fire service organizations and fire prevention experts in urging CPSC to revoke the 1996 sleepwear amendments to the Flammable Fabrics Act.

Sincerely,

James E. Turner, III
Secretary

cc: Honorable William V. Roth Jr.
Honorable Joseph R. Biden
Honorable Michael N. Castle

CF99-1-136

March 8, 1999

Sadye E. Dunn
Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

Re: Sleepwear Revocation

Dear Ms. Dunn:

We are writing to urge the Consumer Product Safety Commission to revoke its 1996 amendments to the Flammable Fabrics Act and return to the stronger fire safety standards which kept children safe for more than twenty-five years.

As you know, after passage of the strict fire safety standard, the number of children suffering from burns dropped dramatically. In fact, the National Fire Protection Association estimates that without this standard, there would have been ten times as many deaths and substantially more injuries, associated with children's sleepwear. Clearly it is a protection that worked.

Some argue that there has been no increase in the number of burn injuries and deaths since the standard changed. This is partially due to problems in the reporting of burn injuries. Furthermore, we do not believe that we should wait for children to be injured before we return to a standard which worked for decades. There are several problems with the new standards which we believe will put children in danger in the future.

The revised standard which exempts "tight fitting" sleepwear in children's sizes up to 14 is based on the assumption that parents will dress their children in tight fitting clothes. Anyone who has bought clothes for a child knows that you do not buy something that fits tightly–you buy something big enough for the child to grow into. Many parents dress their children in hand-me-downs which may be far too big for the child. The combination of clothing made of materials which are not resistant to fire and sleepwear that is not tight fitting , may be lethal.

The revised standard which exempts sleepwear for infants nine months or younger from any fire safety regulations is even more dangerous. Many infants at this age are crawling, and should they somehow become exposed to a flame would be completely vulnerable. Infants deserve more protection, not less.

The Consumer Product Safety Commission's decision to relax the fire safety standard was made with the understanding that the manufacturer' would fund a substantial public awareness campaign so that consumers would understand the importance of dressing their children in tight fitting clothes. This campaign has not materialized. Additionally, the tags that were supposed to inform consumers that a garment is not flame resistant are difficult to understand. As you are probably aware, most are in English–making it difficult for non-English reading consumers to understand that a garment is not flame resistant.

We have the utmost respect for the Consumer Product Safety Commission. The CPSC is the premier agency for protecting our children's safety. Parents look to you to help them ensure their children grow up happy and healthy. We urge you not to sent parents the wrong message. Please return to the strict fire safety standard which was in place until 1996. Please do not wait until the number of children burned begins to rise before you act to protect them.

Sincerely,

Ellen M. McAlinden
Signature

Ellen M. McAlinden
Printed name

CF99-1-137

NATIONAL RETAIL FEDERATION

March 23, 1999

The Honorable Ann Brown
Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

Re: Sleepwear Revocation

Dear Secretary Brown:

The Consumer Product Safety Commission is seeking comments on the Commission's proposal to revoke certain amendment standards for the flammability of children's sleepwear, sizes through 6X and sizes 7 through 14. The National Retail Federation (NRF) appreciates the opportunity to prove comments on this issue.

As background, The National Retail Federation is the world's largest retail trade association with membership that comprises all retail formats and channels of distribution including department, specialty, discount, catalogue, Internet, and independent stores. NRF members represent an industry that encompasses more than 1.4 million U.S. retail establishments, employs more than 21 million people – about 1 in 5 American workers – and registered 1998 sales of $2.7 trillion. NRF's international members operate stores in more than 50 nations. In it's role as the retail industry's umbrella group, NRF also represents 32 national and 50 state associations in the U.S. as well as 36 national associations representing retailers abroad.

In September 1996, CPSC changed the flammability standards for children's sleepwear. The standards exempt all sleepwear for infants nine months or younger, and tight-fitting sleepwear in children's sizes up to fourteen, so they may be made from untreated cotton and cotton blends. At the same time, the Commission amended the policy statements so that infant garments and tight fitting garments could be marketed and promoted with other sleepwear. NRF lauded these changes in flammability standards and we continue to advocate the amendments in children's sleepwear standards. NRF recommends the CPSC not revoke the amendments it implemented only two years ago.

The World's Largest Retail Trade Association

◆

Liberty Place, 325 7th Street NW, Suite 1000
Washington, DC 20004
202.783.7971 Fax: 202.737.2849
www.nrf.com

Fire safety standards for children's sleepwear garments and retailer's role in informing the public about safety is an issue of great importance to the retail industry. NRF members continually work with fellow retailers, employees, manufacturers and the public to ensure maximum safety for all consumers, not just children. The retail industry is on the front line when it comes to informing the public about possible risks associated with certain products as determined by the Consumer Product Safety Commission. While retailers generally don't manufacture products that are sold in stores, they are held accountable for the strictest safety standards, even if they are but one entity out of several who are responsible for the safety of products.

Since implementation of the new flammability standards, retailers have invested significant amounts of time and financial resources to educating consumers on types of children's sleepwear available. JCPenney is one example of a retailer who has undertaken substantial efforts to educate its customers about flammability of children's sleepwear while providing safe choices at the same time. JCPenney developed signage for store fixtures, as well as two separate sleepwear hangtags in different colors to distinguish between fabric and fit standards of the CPSC on children's sleepwear (see attachment). The retailer also developed a third hangtag to distinguish underwear that is not intended for sleepwear. Moreover, JCPenney created a video for store employees explaining to their sales associates the importance of proper merchandising of clothing in the sleepwear program. This program has proven to be successful at JCPenney, and programs among other retailers have had similar successes.

It is also important to note that there has not been sufficient data to prove that certain types of children's sleepwear pose increased risk for burn injury. While the General Accounting Office (GAO) is currently reviewing burn incident data from the ignition of children's sleepwear from small open-flame sources, it is the opinion of the retail industry that a year and a half is not a sufficient period of time to make conclusive findings.

Retailers would like to continue to market and sell children's sleepwear in their stores. More importantly, children's sleepwear is merchandise that consumers want to wear. America is a society of convenience and comfort. They *enjoy* comfortable cotton, and want it when it's most important- at bedtime. It is important for the CPSC to recognize that if the amendments are revoked and children's sleepwear is no longer allowed to be marketed in its current form, parents will go back to putting children of all ages in loose-fitting t-shirts at bedtime.

Having children in loose fitting sleepwear is an objective the CPSC has long avoided.

In conclusion, the National Retail Federation recommends that the Consumer Product Safety Commission maintain the 1996 amendments to the children's sleepwear flammability standards excluding garments sized for infants nine months or younger and tight-fitting garments for children older than nine months. The retail industry has actively pursued educating its consumers on safe choices of children's sleepwear, and consumers demand comfortable sleepwear. If CPSC revokes the amendments, the Commission will find the alternative, children sleeping in loose-fitting t-shirts, even less palatable.

If you have any questions or comments concerning NRF's position on sleepwear revocation, please do not hesitate to contact me. Again, that you for the opportunity to comment on this important subject.

Sincerely,

Sarah P. Whitaker
Director, Government Relations

attachment

CF991-13

HENRY BONILLA
23D DISTRICT, TEXAS

1427 LONGWORTH OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-4511

COMMITTEE ON APPROPRIATIONS

SUBCOMMITTEE ON LABOR, HEALTH AND HUMAN SERVICES, AND EDUCATION

SUBCOMMITTEE ON NATIONAL SECURITY

SUBCOMMITTEE ON AGRICULTURE

Congress of the United States
House of Representatives
Washington, DC 20515-4323

March 22, 1999

Ms. Ann Brown
Chairwoman
Consumer Product Safety Commission
East West Towers
4330 East West Highway
Bethesda, Maryland 20814

Dear Chairwoman Brown:

I am writing regarding to the Consumer Products Safety Commission's pending decision on the 1996 amendments to the Flammable Fabric Act. These amendments allow the manufacturing and sale of certain snug-fitting untreated cotton products for children's sleepwear.

I understand the CPSC made these changes in 1996 based on extensive research and hearings. The research concluded these changes provided parents with a safe alternative without presenting a risk to children.

In compliance with the provisions in the FY 99 VA-HUD appropriations bill, the Commission has published, for public comment, a proposal to revoke the amendment. The General Accounting Office (GAO) will soon complete a mandated study reviewing data collected since the amendment became effective in January 1997. The CPSC has also agreed to conduct a public hearing in April. Therefore, the CPSC will have received public comment, a GAO review and testimony from public hearing prior to making a final decision by July 1, 1999.

If this exhaustive review, coming on the heels of nearly 5 years of research leading up to the decision to amend the Children's Sleepwear Flammability Standards, concludes that the data supports the Commission's decision of 1996, I urge you not to revoke the amendments. Thank you for your consideration of my comments.

Sincerely,

Henry Bonilla
Member of Congress

HB:tdd

PLEASE REPLY TO:

☐ 11120 WURZBACH, SUITE 300
SAN ANTONIO, TX 78230
(210) 697-9055

☐ 1300 MATAMOROS ST., SUITE 1138
LAREDO, TX 78040
(956) 726-4882

☐ 111 E. BROADWAY, SUITE 101
DEL RIO, TX 78840
(830) 774-8547

☐ 4400 N. BIG SPRING, SUITE 211
MIDLAND, TX 79705
(915) 686-6833

http://www.house.gov/bonilla

CF99-1-139

Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207

RE: SLEEPWEAR REVOOCATION

Dear Madam/Sir:

I take this opportunity to urge Consumer Product Safety Commission not to approve the proposed regulation to revoke the Sleepwear Amendment.

The sale of untreated cotton sleepwear does not relax safety standards and these garments will still have to pass flame testing.

The amendments allowing sale of snug-fitting, untreated cotton products for children's sleepwear will reduce confusion to the consumer and provide an informed choice to purchase cotton garments with their children's safety protected.

Respectfully,

Merle C Morrison

Merle C. Morrison
SW Regional Director
Grown & Made in the USA
P.O. Box 14
Lorenzo, Texas 79343

3-13-99

CF99-1-140

- Sleepwear Revocation -

Subject: Children's Sleepwear Standards

Please be advised - - -

(1) Support the ammendment to allow safer sleepwear alternatives which would include cotton

(2) Support the ammendment because it meets (safety guidelines) and (structure requirements)

(3) Do Not revoke the ammendment!!

→ We need more ways to use our USA grown farm products.

- Sharon L. Newell -
Newell Farms, Inc.
5339 Papaya Circle
Harlingen, Texas 78552
956-423-3202

CF99-1-191

7460 St. Pauls Rd.
Lumber Bridge, N. C. 28357

March 15, 1999

Re: Sleepwear Revocation

Office of the Secretary
Consumer Product Safety Commission
Washington, D. C. 20207

Dear Sirs:

As a mother and also a grandmother, I urge the CPSC to maintain the amendment allowing the sale of snug-fitting untreated cotton products as complying sleepwear. The amendments do not relax safety considerations. Most of the mothers I know, prefer to put their children to bed in cotton garments and it is much safer to put children to bed in snug-fitting cotton garments, than using the alternative loose-fitting daywear, such as t-shirts. Many mothers will choose the alternative loose-fitting cotton daywear if they cannot continue to get the snug-fitting untreated cotton products for children's sleepwear.

Over a year ago, it was announced over TV that the airlines recommended when you fly to wear natural products. This, of course, was in case of a crash and resulting fire. Evidently their experience had shown that passengers were better off in a natural product such as cotton in case of a fire. Would this not hold true in a home as well? If no injuries have been associated with snug-fitting cotton products used as sleepwear, then what could possibly be a reason to prevent the use of these garments? For the children up and running about, the snug-fitting cotton garments are much safer than loose flowing garments.

I support CPSC's decision to amend the children's sleepwear flammability standards and agree with CPSC that this amendment offers the consumer safer sleepwear alternatives and that CPSC should not revoke the amendment.

Sincerely,

Joan H. Balfour

Joan H. Balfour
A concerned grandmother

CF99-1-142

LOUISIANA COTTON PRODUCERS ASSOCIATION

An Organization Dedicated to the Interests of the Cotton Grower

3000 Kilpatrick Boulevard, Suite 100
Monroe, LA 71201

March 17, 1999

Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207

Dear Secretary:

I am writing in strong support of maintaining the amendments, which authorizes the manufacture and sale of complying untreated cotton products as children's sleepwear.

The CPSC already has in place stringent safety requirements and tests that go above and beyond that what is needed to ensure the general public that cotton garments do not pose an unreasonable health risk. Apparel manufactures and retailers have voluntarily gone the extra mile in making educational materials readily available to inform parents about sleepwear products.

If given a choice, the vast majority of citizens, young and old alike, would choose to sleep in a cotton garment. We concur with the CPSC that the decision to amend the children's sleepwear flammability standards provides the consumer with safer sleepwear alternatives.

Thank you for your attention to these comments.

Sincerely,

Jon W. Hardwick

Jon W. "Jay" Hardwick

(318) 398-0960 • 1-888-354-8030 • FAX (318) 329-8894

C.F99-1-143

EVA LETHA LUCAS
Route 1, Box 70
Elmer, Oklahoma 73539

March 15, 1999

Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207

SUBJECT: Sleepwear Revocation

To Whom It May Concern:

I support the Consumer Product Safety Commission's decision to amend the children's sleepwear flammability standards.

After 5 years of exhaustive research and extensive hearings, the CPSC concluded that snug-fitting cotton products do not present a flammability risk to children. I believe, therefore, that parents should be able to purchase cotton sleepwear for their children, should they so desire.

I concur with the commission's findings that the amendment offers safer sleepwear alternatives and should not be revoked.

Sincerely,

Eva Letha Lucas

Eva Letha Lucas
Oklahoma-Kansas Chairwoman
National Cotton Women's Committee

3/14/99

CP99-1-144

"Sleepware Revocation"

A. Support - ammendment

B. Support - safer sleepwear alternatives

C. (Do Not) - revoke this ammendment

We raise cotton and this is an important way for us to use our "American" grown crop.

Sherry Wiesman / Wiesman Farms
114 North Queen Park
Harlingen, Texas 78552

David M. Borowski
8624 Janet Lane
Vienna, Virginia 22180

703-903-3868

CF99-1-145

March 20, 1999

Ms. Sadye E. Dunn
Secretary
Consumer Product Safety Commission
4330 East-West Highway, Room #502
Bethesda, MD 20814

Dear Ms. Dunn:

As a burn survivor, I was greatly alarmed to learn of the CPSC's decision to relax the flame resistant standard for children's sleepwear. To tell you the truth, I was stunned.

We know that since the standard was enacted in 1972, deaths and injuries from sleepwear-related fires dropped ninety percent. There is no way to interpret this statistic as other than that the standard worked.

The revised standard assumes that children under the age of nine months are not sufficiently mobile to expose themselves to fire. Whoever wrote this clearly has no experience with children and has no business being involved in this issue. I was burned at the age of six weeks, and I certainly wasn't playing with matches. The house fire that almost took my life caused me to sustain second and third degree burns over almost eighty percent of my body. I was wearing a cotton sleeper. Had flame resistant material been the standard in 1954, my injuries would have been less severe. Certainly, my parents would not have carried such a tremendous burden every day from that day on.

Already this year in one Houston hospital, seven children have been treated for severe burns while wearing untreated cotton sleepwear. I have seen their pictures. One child died. Another lost three limbs. At one time, severe injuries were commonly sustained by children in automobile accidents, injuries that could have been prevented by safetyseats. You enacted a standard for their protection. Please, please use the same judgment when dealing with the cotton industry as you use when dealing with car manufacturers. If children are dying preventable godawful deaths, and families are being devastated by the injuries and disfigurements of those who manage to survive, do what you have been commissioned to do, HELP THEM!

Of all the regrets one experiences in a lifetime, the sharpest stem not from things we have done, but from things we realize, too late, we should have done. Not restoring the flame resistant standard for children's sleepwear is something you and I, children who are being burned and who will be burned, and everyone who loves them, will regret again and again, for years to come.

Sincerely,

David M. Borowski

CF-991-146

Columbus Fire Department

FIRE PREVENTION DIVISION
510 10th Street • P. O. Box 1340
Columbus, Georgia 31902-1340
(706) 653-3520
FAX (706) 653-3504

Office of the
Fire Marshal

February 22, 1999

Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207

RE: SLEEPWEAR REVOCATION

I strongly support the proposed revocation by the Consumer Product Safety Commission of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability - standards that are needed to help prevent death and disfigurement for hundreds of our nations infants and young children.

The protection of young children against burn injuries and death is a leading priority among all fire departments and those divisions dedicated to these causes. Young children, in particular those under the age of 9 months are dependant upon others to provide the care necessary to keep them from harm. At such young ages, children are incapable of recognizing and removing themselves from danger. Furthermore, it is inconceivable that very children could perform any act that would diminish the extent of injury caused by fire (i.e., stop,drop and roll). As children become mobile and more independent by nature, they are exposed to greater hazards and possible exposure to heat and flame sources.

To ensure the safety of our children, the revocation of the relaxed flammability standard for snug-fitting sleepwear is of utmost importance. Ideally, children should be fitted in snug-fitted sleepwear at all times. However, the reality of the situation is that many caregivers buy ill-fitting sleepwear that is too large for the child. The reasons given for the purchase of ill-fitting garments are numerous, however it is common practice to purchase second hand garments at reduced prices, wear hand me downs from older siblings, or purchase garment that may be too large and allow for "growing room". For any of these reasons, an ill-fitting garment defeats the purpose of tight-fitting garments and therefore exposes the child to an increased risk of burn injuries and death.

Statistics clearly show that burn injuries and deaths have been reduced over the last twenty-five years, since the flammability standards were in effect and prior to the relaxation of the standards in September 1996. It is due to these relaxed standards that injuries are again on the rise.

As a member of the fire service, I see first hand the pain and suffering children, as well as their families, must face during these tragic occurrences. I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. This standard will make a difference in the prevention of death and the permanent disfigurement for our nations children.

Sincerely,

Jeff Meyer, Fire Marshal
Columbus Fire Department