



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

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Manufacturers, Importers and Retailers of Children's Upper Outerwear

Dear Sir or Madam:

The U.S. Consumer Product Safety Commission (CPSC) is an independent federal regulatory agency responsible for protecting consumers from unreasonable risks of injury and death from consumer products. Our authority is set forth in the Consumer Product Safety Act (CPSA), 15 U.S.C. §§ 2051-2084, and the Federal Hazardous Substances Act (FHSA), 15 U.S.C. §§ 1261-1278.

I am writing this letter to urge you to make certain that all children's upper outerwear you import, manufacture, distribute or sell in the United States complies with the currently applicable voluntary consensus safety standard, ASTM F-1816 Standard Consumer Safety Specification for Drawstrings on Children's Upper Outerwear, which can be ordered from ASTM International (www.astm.org).

Young children can be seriously injured or killed if the upper outerwear they are wearing catches and snags on other objects. From January 1985 through June 1997, CPSC received reports of 21 deaths and 43 non-fatal incidents involving the entanglement of children's upper outerwear having drawstrings. The ASTM standard addressing this issue (F-1816) took effect in June 1997. In the period since, we have seen a marked decrease in fatalities and incidents. We believe that many of the remaining injuries and deaths would be prevented if all children's upper outerwear met the requirement of the ASTM standard.

Inasmuch as the ASTM standard has been in place for several years, the CPSC Office of Compliance staff considers children's upper outerwear with drawstrings at the hood or neck area to be defective and to present a substantial risk of injury to young children under section 15(c) of the FSHA, 15 U.S.C. § 1274(c). Should the staff encounter such products, it will seek a recall of these products. There is no persuasive reason for children's upper outerwear to be manufactured with drawstrings at the hood and neck area since products without these drawstrings have been on the market for many years.

In view of the foregoing, I urge you to review your product line and assure that no children's upper outerwear that you manufacture, import, distribute and sell in the United States has drawstrings at the hood or neck area. The CPSC staff will continue to follow up as appropriate to assure that firms are meeting their obligations in this area.

Section 15(b) of the CPSA, 15 U.S.C. § 2064(b), requires every manufacturer (importer), distributor, and retailer of consumer products to report immediately to the Commission when it obtains information that reasonably supports the conclusion that a product distributed in commerce contains a defect that could create a substantial product hazard or creates an unreasonable risk of serious injury or death. The statute also provides for the imposition of civil penalties for failing to report the required information. The enclosed [Recall Handbook](#) provides information to assist firms to understand their obligations and responsibilities under the CPSA.

Sincerely,

/s/

John Gibson Mullan

Enclosure: [Recall Handbook](#)