

**JOINT MARKET SURVEILLANCE ACTION ON CORDS
AND DRAWSTRINGS ON CHILDREN'S CLOTHING**

**Supported by DG SANCO - Consumer Affairs
Agreement No: 17.020200 / 08 / 507576**

Technical Report

Covering the period 15 August 2008 – 15 February 2010



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INTRODUCTION

This is a technical report prepared for the Joint Market Surveillance Action on Cords and Drawstrings on Children's Clothes. The report gives an overview of the main results, findings and deliverables from the action.

The technical report in particular includes the following information:

Activities undertaken in the joint action:

All activities undertaken throughout the joint action, including awareness-raising and dissemination activities are described in chapter 3. Awareness-raising activities are described in chapter 3.6. Dissemination activities are described in chapter 3.5. Co-ordination activities are described in chapter 3.4 and activities undertaken at national level by the participants are described in chapter 3.3.

Explanations for any differences between the foreseen activities and the work program and those actually undertaken are explained in chapter 3.7. This chapter also includes an overview of additional activities undertaken that were not foreseen in the agreement.

Results of the joint action

A description of the results of the joint action and how they have contributed to the overall objectives distinguishing between results at a global and national level is presented in chapter 2. Differences between the foreseen results and objectives of the joint action and those actually achieved are explained in chapter 2.4. This chapter also includes an overview of additional results that were not foreseen in the grant agreement.

An analysis of the results achieved and recommendations for future market surveillance actions are presented in chapter 2.3 and 4.

The report is an additional deliverable produced from the joint action. The report will, by and large, repeat the technical chapters from the final technical implementation report. The final technical implementation report is due 31st of May 2010.

1 BACKGROUND INFORMATION

1.1 Summary of Project Description

(The full plan can be found in [1].)

1.1.1 Title of the Joint Action

Joint Market Surveillance Action on Cords and Drawstrings on Children's Clothing

The joint action was supported financially by the European Commission under Grant Agreement No: 17.020200 / 08 / 507576.

1.1.2 Participating Member States

The application for the joint action was signed by Stichting PROSAFE and 11 Member States (Austria, Bulgaria, The Czech Republic, Denmark, Estonia, France, Greece, Ireland, Lithuania, The Netherlands and Portugal). Annex 3 gives an overview of the people and organisations actually participating in the action.

Furthermore, the authorities in Spain and Turkey have followed the action actively and attended several project meetings.

The applicant body that also took overall responsibility for the joint action was Stichting PROSAFE, the legal body behind PROSAFE. (The PROSAFE organisation is an informal cooperation between product safety enforcement officers in Europe.)

The coordination of the project was subcontracted to an independent consultant, Torben Rahbek. Issues related to the daily management of the project were discussed between Konstantinos Zisis from Greece, Tom Beakey from Ireland and Torben Rahbek. (Tom Beakey left the action prior to September 2009 due to retirement.)

1.1.3 Budget

The total budget cost for this project was 210.942,07 € out of which the Commission funded 69,75% of the total cost, equivalent to 147.123,95 €.

1.1.4 Primary Objective

The primary purpose of the joint action was to ensure that children's clothing placed on the EU market were safe with regard to cords and drawstrings. Thus, the main deliverable of the project was intended to bring about a significant reduction in the amount of unsafe children's clothing presently available on the European market.

1.1.5 Secondary Objective

The secondary objective of the joint action was to gather further experience related to best practice techniques by running a joint market surveillance action that involves many Member States, i.e.:

Promotion of a harmonised approach to the market surveillance and enforcement of the safety requirements for cord and drawstrings on children's clothing.

Promotion of cooperation between the market surveillance authorities and Customs.

Acquiring additional experience with the execution of a joint market surveillance and enforcement action with participation of many Member States.

1.1.6 Deliverables of the Joint Action

The primary purpose of the joint action was to ensure that children's clothing placed on the EU market were safe with regard to cords and drawstrings. Thus, the main deliverable of the project was intended to bring about a significant reduction in the amount of unsafe children's clothing on the European market.

The progress in the project was monitored using the following indicators:

The share of non-compliant children's clothing that is found on the European market.

The share of non-compliant children's clothing that is imported to Europe.

The share of non-compliant children's clothing that is produced in Europe.

The aim of the project was to reduce the level to below 2% for each indicator at the end of the project.

Further deliverables from the project were:

Quarterly progress reports.

The final report.

A half-day workshop to present the main findings and results.

1.1.7 The Activities of the Joint Action

The activities of the joint action were divided into three stages:

First stage August 2008 – March 2009

The first stage comprised the starting up of the joint action including establishing the first initial overview of the market.

From August to December the market surveillance activities were underway and the possibility for cooperation with the Customs was explored.

Procedures and reporting forms were developed and experiences from previous actions in the Member States were collected. A call for tender to assess the laboratories' capacity to test in the joint action was issued. Furthermore, an initial monitoring of the market was carried out. The market surveillance activities continued during the months January to March.

Second stage April 2009 – July 2009.

The market surveillance inspections continued. Potentially non-compliant clothes were tested at a laboratory and the results were collected and disseminated by the coordinator.

Third stage July 2009 – February 2010.

The joint action was completed and the participants issued a final report with conclusions and recommendations from the activities. A half-day workshop was organised to disseminate the results.

It was foreseen that 75 clothes were tested at a laboratory in the second stage of the project.

The joint action was coordinated with the EMARS II project which is also facilitated by PROSAFE. A number of tools, methods and practices that have been described or developed in the context of the EMARS II project (and its predecessor EMARS) were used in the joint action and experiences were reported back to the EMARS II project, Task A and Task B in particular. Task A deals with further development of the best practices and Task B develops best practices for joint action.

The joint action also included activities to encourage those Member States that were not in the financial scheme of the joint action and activities to liaise with the European Commission and stakeholders such as the European textile industry and the consumer organisations.

1.2 Other Background information

1.2.1 The European Market

The participating Member States collected information about the market situation in their territories. This information forms the basis of the picture of the European market that is presented in this chapter.

It is difficult to get an overview of the annual turnover of children’s textiles because the numbers are mixed into the figures for textile imports as a whole. Two Member States provided information about their total imports (table 1).

Member State	Imports	Exports	Domestic production
Austria	EUR 3,6 bn. (from Asia: EUR 1,2 bn.) (from EU25: EUR 1,7 bn.)	EUR 1,7 bn.	EUR 0,7 bn. (for the domestic market)
Denmark	EUR 4,3 bn.	EUR 3,8 bn.	-

Table 1. Annual imports of textiles to Austria and Denmark (AT: figures from 2006; DK: figures from 2008).

The Portuguese authorities estimated an annual turnover of EUR 550 million for children’s clothes in their country. These figures indicate that the annual consumption of children’s clothes in Europe is a business with a multi-billion annual turnover.

A significant share of the clothes on the markets in the participating Member States is imported (table 2). It is estimated that approximately half of all children’s clothes on the European market as a whole are imported from outside the European Union. The main exporters are China, Turkey, India and Taiwan. The rest of the clothes on the markets in the participating Member States are produced inside the EU. The eleven Member States that participated in the joint action have indicated that the majority of the children’s clothes on their national markets that are produced inside the EU are domestically produced or imported from Italy, Bulgaria, Germany, France, Belgium, UK, Spain and Poland.

Table 2 also shows that many clothes are imported even though they appear to be domestically produced. Greece and Denmark have reported that the majority of children’s clothes imported to the two countries are designed in their countries and sold under a domestic brand name. The situation is exactly the opposite in other countries. In the Czech Republic, imported children’s clothes are often sold under anonymous brand names. This makes traceability very difficult (if at all possible) for the market surveillance authority.

Member State	Estimated import share	Domestic production
AT	98%	-
BG	-	-
CZ	85%	15%
DK	The majority is imported but under a Danish brand and design.	-
EE	80-85%	15-20%
FR	-	-
GR	The majority is imported but under a Greek brand and design.	5-10%
IE	-	0%
LT	95%	5%
NL	-	-
PT	40%	60%

Table 2. Estimated shares of imported clothes to the participating Member States.

Three of the 11 participating Member State authorities maintain databases of manufacturers, importers and distributors of children’s clothes (or clothing in general). They are Greece, Austria and Portugal. Apart from the three, the Czech authorities have access to a voluntary database managed by the Czech “Association of Textile-Clothing-Leather Industry” and several more participants have links with national textile business associations.

1.2.2 Risks and Accidents

There is a general concern among experts in child safety about cords and drawstrings because they present several serious risks for children. Likely hazards presented by cords and drawstrings in clothes include:

A long cord or drawstring on clothes worn by a playing child can become entrapped in a narrow opening. This can be dangerous if the trap is located so high above ground level that the child is unable to reach the ground (e.g. on a roof of a play house); if the trap is located in a fast moving item (e.g. a swing) or if the trap is located where the child moves quickly and irreversibly (e.g. down a slide). In either case, there is a risk that the child will get strangled, particularly if the cord gets caught up around the neck.

A long cord or drawstring on the back of clothes may get caught in a door of a vehicle. This is dangerous when the child alights from the bus. If the bus driver fails to notice that the child is caught and moves off, the child will become severely injured.

Long cords or drawstrings on nightwear for small children may cause strangulation if the child gets entangled during its sleep.

Elastic cords or drawstrings (in particular with embellishments at their ends) may cause eye injuries if the string gets trapped, stretches, loosens again and flicks back.

Accidents caused by cords and drawstrings can be very serious and even fatal.

1.2.3 Regulation and Standardisation

Safety of clothes falls under the General Product Safety Directive. It prescribes that producers shall only place safe products on the market. For a number of products this can be presumed to be the case if the product complies with a standard, the reference of which is published in the Official Journal of the European Union.

This is the case for children's clothes with cords and drawstrings. Safety provisions for the cords and drawstrings are laid down in the European standard EN 14682 [2]. The 2004-version of the standard is referenced in the Official Journal [3]. This standard was revised in 2007. The revision mainly consisted of an inclusion of explanatory figures and drawings.

At present, CEN/TC248/WG20 is working on a new revision of the standard.

1.2.4 The European Situation before the Joint Action

Several of the participating Member States had undertaken market surveillance activities on cords and drawstrings before the joint action started.

A Danish project from 2008 on internet sales comprised inspections in 20 internet shops and 20 physical shops. The project was limited to 12 laboratory testing. All of the 12 tested garments failed the test. (The results are included in the reporting in this joint action.)

A Portuguese survey at Portuguese retailers revealed 20 dangerous clothes within 2 days.

In 2008 Bulgaria conducted a national campaign on safety of clothing for small children. The campaign aimed at ensuring that children's clothing conforms to the requirements in the standard BS EN 14682.

Estonia had conducted a project on cords and drawstrings in 2007 and found that some 20% of the tested clothes were non-compliant.

A 10 year old Greek boy lost 20% of his eye sight because of an accident involving an elastic cord in 2007.

A 2½ year old Greek boy was strangled and died in November 2008 because a cord in the neck area of the garment was caught in a slide on a playground.

Moreover, France had conducted market surveillance activities on cords and drawstrings in summer 2008. The scope and the method of the investigation were somewhat different from those of the joint action so the results have not been included in the statistics. Still the French conclusions support the picture from the other European surveys. The survey comprised 213 economic operators, mainly retailers. The purpose was to check that importers of children's clothes complied with the French law that transposes the GPSD and that children's clothes conformed with the European standard EN 14682.

A total of 425 inspections were carried out and the number of checked clothes was even higher as some inspections, according to the reporting from the project, comprised large numbers of non-compliant clothes that had been recorded as one non-conformity. Still the result was that more than 10% of all inspections resulted in non-conformities. The survey also showed that more than 16% of the economic operators failed to comply with the requirements. This figure however includes requirements beside those of EN 14682, e.g. requirements for traceability and information to the consumers. No samples were taken during the investigation as all testing could be done directly by the investigators.

One observation from the French survey was that many of the economic operators appeared to rely on their suppliers' ability to deliver safe clothes only. The retailers' job in this case decreases to merely putting clothes (presumed to be safe) on the shelves in their shop. The French authorities have advised the French business associations to address this issue in an informative campaign or even training actions.

A similar Dutch study from April – June 2008 gave almost the opposite results. Inspections were carried out at 24 economic operators and approximately 1500 different kinds of children's clothes were checked. The majority of the operators (19 of the 24) complied with the regulation and only compliant garments were found at them. Only at 5 of the 24 operators were doubtful garments found and in total 12 samples were taken for further investigation. None of these 12 samples complied with the standard; ten of the non-conformities concerned cords in the hood and neck area.

The Dutch study therefore concluded that most of the producers on the Dutch market had already adapted their product to the new standard. Thus, specific communication to stakeholders in the Netherlands was deemed unnecessary.

1.2.5 The International Situation

Cords and drawstrings in children's clothes is also seen to be an issue in other territories. The US consumer product safety committee CPSC maintains a website with recalls

undertaken by US importers and manufactures. Fifteen recalls in 2009 concerned children's clothes. Eleven of these were due to strangulation hazards caused by cords and drawstrings in the hood and neck area.

The background for the focus is a number of severe accidents. According to [4] CPSC received reports of 22 deaths and 48 non-fatal incidents caused by children's clothing in the period from January 1985 through January 1999 (15 years).

CPSC therefore issued the publication "Guidelines for Drawstrings on Children's Upper Outerwear" in February 1996 [4]. The idea being to help prevent children from strangling or getting entangled on the neck and waist drawstrings of garments. One year later in June 1997, ASTM adopted a voluntary standard that incorporated CPSC's guidelines. The title of the standard is "Standard Safety Specification for Drawstrings on Children's Upper Outerwear" and its reference is ASTM F1816-97.

The guidelines and the standard provide consumers with information to prevent hazards with garments and to make informed choices when purchasing children's clothes.

2 RESULTS OF THE JOINT ACTION

2.1 Introduction

The Grant agreement [1] identifies the following deliverables:

The main deliverable was intended to bring a significant reduction in the amount of children's clothing with unsafe cords and drawstrings placed on the EU market. The progress in the project was monitored using the following indicators:

- The share of non-compliant children's clothing that is found on the European market.
- The share of non-compliant children's clothing that is imported to Europe.
- The share of non-compliant children's clothing that is produced in Europe.

The aim of the project was to reduce the level to below 2% for each indicator at the end of the project.

Further deliverables from the project were:

- Quarterly progress reports.
- The final report.
- A half-day workshop to present the main findings and results.

2.2 Results from Member States' Market Surveillance Activities

2.2.1 *Capturing Results from the Member States*

The Member States reported the results of their market surveillance on a quarterly or monthly basis. They were requested to report the number of garments checked, the number of non-conforming garments found, the intended age group for the non-conforming garments and the nature of the non-conformities split on non-conformities in the hood and neck area, non-conformities in the waist area and other non-conformities.

Additionally, some authorities reported data in other time bases or accumulated figures for the entire project. Such figures have been divided proportionally over the relevant periods.

The detailed results from the Member States' inspections can be found in tables in Annex 2.

2.2.2 Level of Compliance

A total of 16,381 garments have been checked in the joint action. The inspections showed that 2,188 of these did not comply with the safety requirements. The numbers are shown in figure 1.

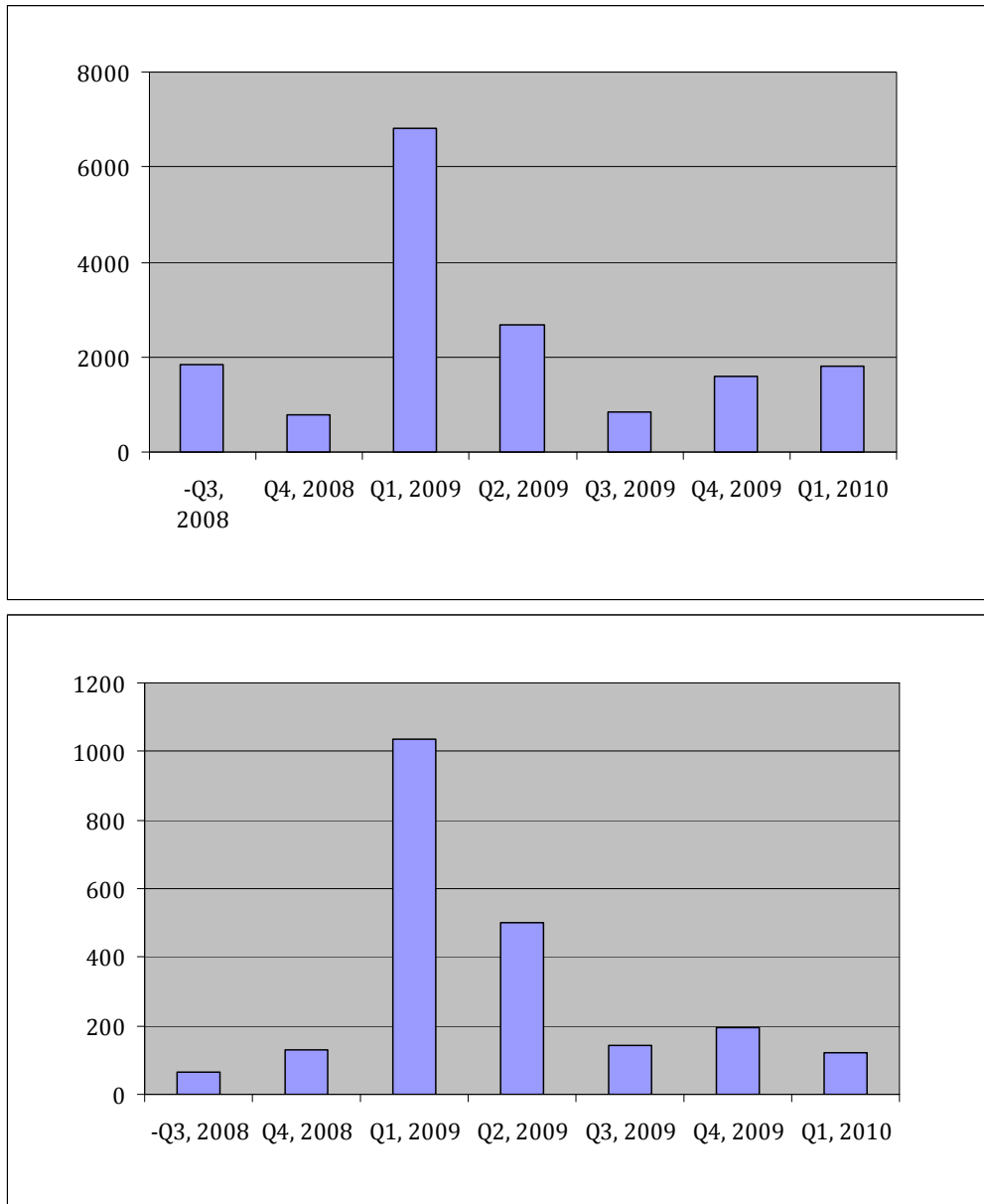


Figure 1. The number of clothes checked in the joint action. The upper diagram shows the number of clothes checked. The lower diagram shows the number of non-compliant clothes found. "-Q3, 2008" includes checks carried out from 15th of August to 30th of September 2008. "Q1, 2010" includes data from 1st of January to 15th of February 2010.

The upper diagram in the figure shows that the participating Member States checked some garments in the last months of 2008 but the bulk part of the checks took place in the first half of 2009. This was in accordance with the plans of the action. A few Member States continued their inspections in the second half of 2009 and all the way through until 15th of February 2010 when the joint action ended.

The lower diagram in figure 1 shows the number of non-compliant clothes found in the inspections. These are clothes against which the market surveillance authorities took action or clothes where the economic operator took voluntary measures. The measures could be a recall or withdrawal from the market but due to the nature of the non-compliances, it would often be possible to mend shortcomings. As an example, a frequent short-coming with children's clothes is presence of (long) drawstrings in hoods or around the neck of a garment. Such a drawstring represents a serious risk that the child is strangled. Therefore such clothes are to be removed from the market. The short-coming can however easily be mended by removing the drawstring to make the modified garment safe.

The 2.188 garments showing in the lower diagram in figure 1 were removed from the market by recall, withdrawal or mending the non-compliance. The garments that presented a serious risk to the user were notified via the RAPEX system. The attention created by the joint action meant that the number of RAPEX notifications on clothing increased dramatically as can be seen from the official statistics published by the European Commission [7]. The statistics shows that the Member States issued almost 400 RAPEX notifications on dangerous clothes in 2009 (where the joint action was active the entire year) compared to 140 in 2008 (where the joint action started in August) and 54 in 2007 (the year before the joint action). So the number of notifications has increased 7 – 800% in two years. Part of this increase can be attributed to the joint action.

The RAPEX notifications are important as the other Member States are obliged to check if the garments notified are present on their markets. If they are found on the market, the Member State is obliged to take measures against the product so the result will be that it is taken of the entire European market.

Figure 1 show that the number of non-conforming clothes appears to have followed the number of checked clothes quite closely. The ratio between these two figures is shown in figure 2.

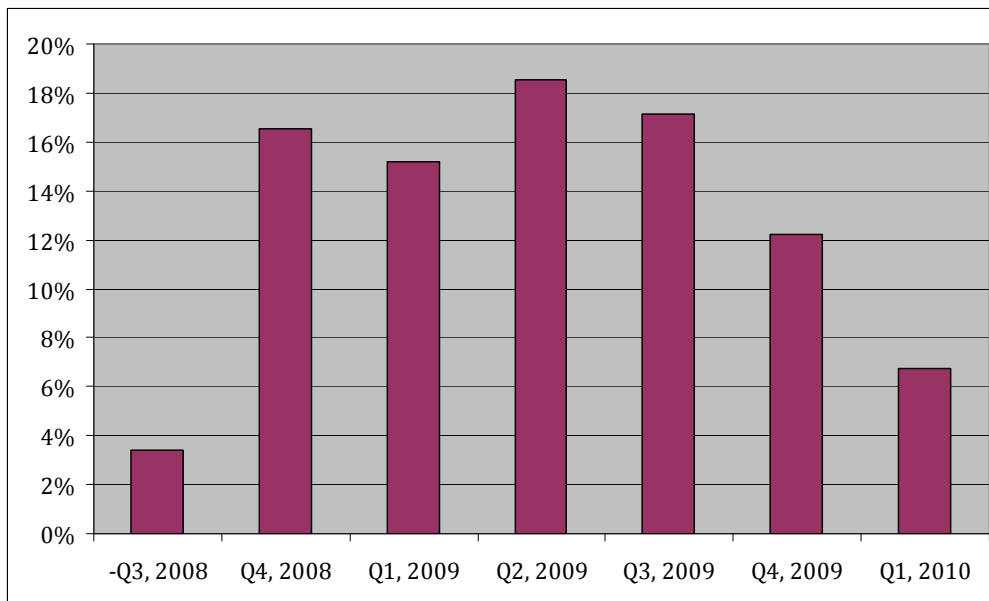


Figure 2. The share of non-conforming clothes found in the inspections. "-Q3, 2008" includes checks carried out from 15th of August to 30th of September 2008. "Q1, 2010" includes data from 1st of January to 15th of February 2010.

Figure 2 shows that the non-compliance level has fluctuated over the course of the action but the trend seems to show there to be a reduction from the beginning to the end of the action. This is in line with the impression of several of the participants that the situation on the market improved over the action.

The first quarter of the action showed a non-compliance level below 4%. The figure includes results from checks carried out before the beginning of the action, e.g. a large Dutch study in summer 2008 where approximately 1,500 garments were inspected and only 12 non-compliant clothes were found. The French authorities also carried out a large study comprising several hundred garments. It has not been included in the numbers behind figure 2 because the exact number of clothes was not recorded. The result of this study was that a non-compliance level of 11,5% was recorded.

The Member States carried out more than half of the checks in first half of 2009. In this period, a non-compliance level of 15 – 19% was recorded. All 11 participating Member States (except France as explained in chapter 3.3.3) contributed to the results in these two quarters by checking clothes. The number of countries carrying out checks in the context of the joint action fell to 7, and 6 in the two last quarters of 2009 respectively.

It is tempting, but risky to take the numbers in figure 2 as an estimate of the share of unsafe clothes on the market. One has to observe that the numbers are based on four conditions:

Firstly, the joint action only involved 11 of the 27 EU Member States. It is expected that there will be systematic differences when comparing them with the 16 countries outside the joint action. (Some of the 16 may have decided not to be involved because problems with cords and drawstrings on children's clothes on their market is not an issue for them or ranks low on their list of priorities.)

Secondly, the sampling of clothes to be checked is likely to be biased. Market surveillance inspectors are used to "zooming in" on non-compliant products as this is the most efficient way to spend their resources. Thus, the number of clothes reported inspected only reflects the actual number of clothes on the market, to some degree; most inspectors would skip over a number of compliant clothes during their inspections whereas the number of non-compliant clothes usually would be recorded correctly. Moreover, this competence of the inspectors is likely to have increased over the course of the action, thus increasing the bias in the sampling.

Thirdly, no risk assessment has been carried out on the non-conformities recorded. Therefore marking errors with insignificant risks is just as important in this statistics as dangerous cords around the necks of small children.

Fourthly, the statistics is based on an assessment of models which does not take their market share into account. The general impression of the joint action is that the majority of the non-conformities are found in clothes from small, local producers that manufacture or import garments in small numbers. Such garments carry the same merit in the statistics as those garments from big pan-European producers that market the same model across the entire European market and which the European consumer is more likely to come across when buying children's clothes.

The numbers behind figure 2 (as can be seen in Annex 2) suggest that there are differences between the Member States in their reporting practices, their approaches to the market and the markets themselves. This is shown in table 3.

Member State	Number of clothes checked	Number of non-conforming clothes	Non-compliance level
AT	5.433	885	16%
BG	2.429	238	10%
CZ	446	385	86%
DK	28	25	89%
EE	3.649	427	12%
FR	-	-	12% *)
GR	1.970	150	8%
IE	640	18	3%
LT	255	35	14%
NL	1.512	12	1%
PT	19	13	68%
Total	16.381	2.188	13%

*) The non-compliance level was estimated by the French authorities in a study conducted in summer 2008. The exact number of checked clothes was not recorded.

Table 3. Non-compliance levels recorded by the participating Member States.
More details on the French survey can be found in chapter 1.2.4.

The differences that appear in the table point to a number of different issues. Many Member States have supposedly recorded the number of clothes that they have checked and the number of clothes that were found to be non-conforming. The non-compliance levels in those countries are in the region of 1 - 15%. Three Member States (the Czech Republic, Denmark and Portugal) appear to have focused their attention on clothes that appeared to be non-conforming. This focus drives the recorded non-compliance levels in those countries up to close to 100%, but it is not a sign that all clothes in these markets are unsafe.

The aim of the project was to reduce the non-compliance level to below 2% for each of the following indicators at the end of the project:

- The share of non-compliant children's clothing that is found on the European market.
- The share of non-compliant children's clothing that is imported to Europe.
- The share of non-compliant children's clothing that is produced in Europe.

Despite the significant results from the project it is difficult to measure if this has been met. Firstly, the market surveillance authorities tend to focus on non-compliant products in their activities. This makes the sampling biased and not random. Furthermore, this bias tends to worsen during the project, because the inspectors get better and better to focus as they are trained on the job. The bias tends to drive up the recorded non-compliance level as the inspector only records part of the total amount of garments that have been inspected, but

definitely all the non-compliant ones. Secondly, the distinction between clothing that is imported to Europe and clothing that is produced in Europe is more difficult in practice as it seems. Often the marking on clothes are poor meaning that it is difficult to trace back the product to the producer. This is particularly valid for clothes that are imported or manufactured in small numbers by local operators. Moreover, several big European brand names have sourced their production to countries outside of the EU, meaning that clothes from apparently European producers are actually imported. This is very difficult to reveal for the market surveillance authorities without spending an unjustifiable amount of time.

Therefore the conclusion is that there are very strong indications that the project has brought about a significant reduction of the share of non-compliant children's clothing on the market, but it is impossible to measure the reduction within the framework of the action.

2.2.3 Nature of the Non-Conformities

The non-conforming clothes have been categorised according to the intended age of the user. The categorisation can be seen on figure 3.

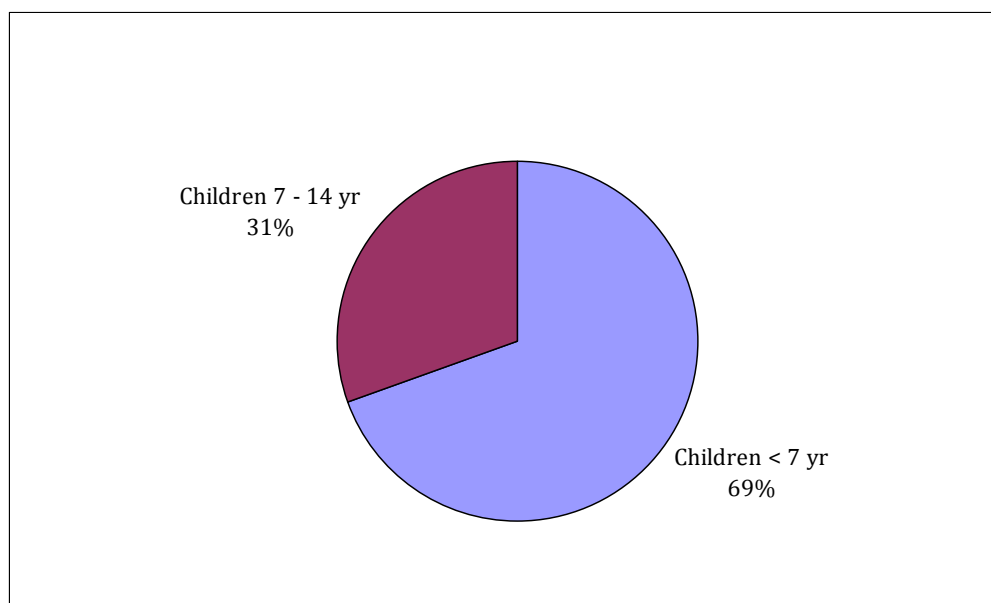


Figure 3. The categorisation of the non-conforming clothes with respect to the intended age of the user.

The figure shows that more than two-thirds of the non-compliant clothes were intended for small children, i.e. children under the age of 7. This is also reflected in the nature of the non-conformities as shown in figure 4.

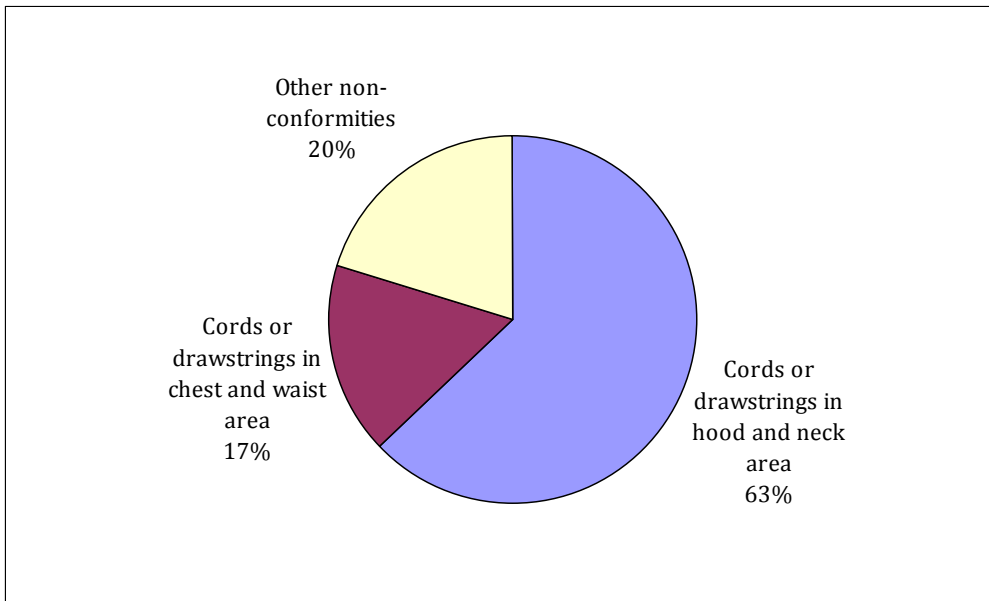


Figure 4. Categorisation of non-conformities. (Note that one garment may have more non-conformities.)

Figure 4 shows that the predominant non-conformity was cords or drawstrings in the hood and neck area. This non-conformity was found in almost two-thirds of the unsafe clothes. Cords and drawstrings are completely forbidden in the hood and neck area of clothes intended for small children below 7 years and only short cords and drawstrings are allowed in clothes for children between 7 and 14 years. Cords and drawstrings in the chest and waist area account for 17% of the non-conformities and “other non-conformities” for the remaining 20%. (The category includes cords at the ends of sleeves, at the lower hems of dresses and t-shirts, at the end of trouser legs, etc.)

Figure 5 shows how the relative shares of the three categories of non-conformities have evolved during the action. The figure suggests that the Member States were able to drive down the share of the most dangerous non-conformities, those related to cords and drawstrings in the hood and neck area, in the intense phase of market surveillance in the first and second quarter of 2009. It can also be seen from the figure that the share of this non-conformity was very significant in the remaining part of the action. It may be an indication that the Member States focus their attention on the most dangerous clothes on the market when they are carrying out market surveillance.

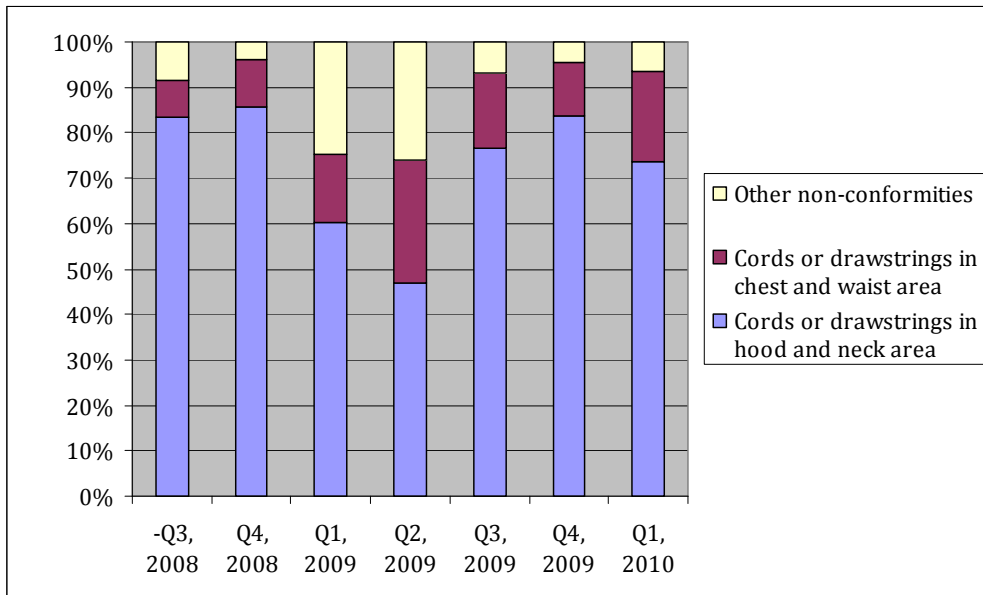


Figure 5. The distribution of non-conformities in the clothes checked during the joint action.

2.3 Results from Laboratory Tests

The project plan foresaw that 75 tests were carried out at a laboratory. At the end of the joint action only 10 garments had been tested. The main reason for this discrepancy was that the Member States discovered that the measurements in the standard seldom required laboratory equipment. The testing was more a question of applying the correct clauses and therefore the participants decided to do more than 100 joint assessments of clothes as described in chapter 3.4.1 and only use the laboratory for “tricky” cases and tests that required sophisticated equipment, e.g. tests for elasticity.

At the end of the action, all 10 laboratory tests concerned “tricky” cases where it was not obvious how the standard should be applied correctly.

2.4 Differences between Foreseen Results and those Actually Achieved

Table 4 below compares the results foreseen in the work programme from the grant agreement [1] with those actually achieved in the joint action.

Foreseen Deliverable or Result	Deliverable or Result Actually Achieved
Main deliverable	
A significant decrease of the share of non-compliant children's clothes that were found on the European market.	Desired result achieved. Analyses of the results from the market surveillance activities indicate that the share of non-conforming clothes on the market has decreased during the action. Please also see chapter 2.2.2.
The share of children's clothes with non-compliant cords or drawstrings that were imported to Europe.	Unclear if desired result was achieved. The data from the Member States does not make a distinction between imported and EU manufactured clothes.
The share of children's clothes with non-compliant cords or drawstrings that were produced in Europe.	Unclear if desired result was achieved. The data from the Member States does not make a distinction between imported and EU manufactured clothes.
Further deliverables	
Quarterly progress reports	Deliverable produced as planned. Reports were submitted 10 January 2009, 27 April 2009, 3 August 2009, 20 October 2009 and 14 February 2010.
One interim report	Deliverable produced as planned. The technical interim report covering the period from 15 August 2008 to 30 April 2009 was issued 31 May 2009 [6]. The technical interim report that was revised is re-issued to accommodate received comments from the Commission.
The final report	Pending. The final technical implementation report from the joint action will be issued 31 May 2010.
A workshop to present the main findings and results	Deliverable produced as planned. A half-day workshop was organised 30 November 2009 with some 25 attendees. Please also see chapter 3.5.5.
Deliverables not foreseen in the contract	
"Expert paper" and video showing the risks with non-compliant cords and drawstrings on clothes	A paper highlighting the risks posed by non-compliant garments using examples from the joint action. A supporting video. Please also see chapter 3.5.2.
Evaluation of the standard EN	A memo with 12 observations on the standard EN 14682

Foreseen Deliverable or Result	Deliverable or Result Actually Achieved
14682	made in their joint assessments of garments. (Please also see chapter 3.4.5.)
Checklist for inspections of children's clothes with cords and drawstrings.	A checklist for inspections of children's clothes with cords and drawstrings. Please also see chapter 3.4.4.
Press releases	2 press releases were published 1 st of April 2009 and 30 th of November 2009. Please also see chapter 3.5.1.

Table 4. Overview of results and deliverables foreseen in the working program and those achieved.

3 ACTIVITIES UNDERTAKEN IN THE JOINT ACTION

3.1 Overview of Activities

This chapter presents all activities undertaken in the joint action. A timeline of the action can be found in Annex 1.

Detailed descriptions of some of the activities are found in chapters 3.2 - 3.6.

Project management activities

- Select consultant
The first activity in the joint action was to select a consultant to manage and coordinate the joint action. This was done by Stichting PROSAFE drawing from its pool of the consultants and appointing an individual. This consultant was then engaged and a contract drawn up for his signature.
- Management of the joint action
The consultant developed a couple of tools (documents) to facilitate the follow-up of the financial situation and the Member States' contribution: A note with a timeline and important dates, a "dashboard" with an overview of the financial situation and a table of the Member States' contributions in kind. The documents were discussed at all meetings in the project group. More information can be found in chapter 3.4.8.
- Progress reports
Brief progress reports have been produced every three months to update the Commission about the status of the joint action.
Furthermore, a couple of updates have been produced at the request of the Commission for meetings in WG Network or the GPSD Committee.
- Interim report
One interim technical implementation report was produced. It covered the period 15 August 2008 – April 2009, [6].
- Filing of documents
A document depository has been created on the EMARS WebEx website where all documents produced by the joint action are stored.

Project Meetings

The joint action has organised six project meetings over the course of the action. Stakeholders were invited for two of the meetings. The consultant has produced invitations, agendas, minutes, lists of participants and presentations for the meetings. More information on the meetings can be found in chapter 3.2.1.

Selection of test laboratories

It was decided to run the laboratory tests jointly among the participants. A call for tender was prepared and issued and quotations were received and assessed. The outcome of the call for tender process resulted in selecting the Czech Textile Testing Institute Textilní zkušební ústav, s.p. or TZÚ. A contract was drawn up and signed. More information can be found in 3.4.2.

Exchange of information on inspected clothes

The coordinator drafted an inventory of the garments that had been assessed by the participants at the meetings. The inventory included photos of the garments as well as the conclusion of the discussion and any other relevant information.

A short description of the procedure and the inventory is given in 3.4.1.

Coordination of tests, sampling of clothes

A procedure for doing joint sampling and testing was laid down. Instructions for submission of garments to the laboratory were developed.

More information can be found in chapter 3.4.3.

Testing

Testing of 10 garments was conducted. Test reports from TZÚ were uploaded to the document depository.

Detailed results can be found in chapter 2.3.

Questions discussed in the Rapid Advice Forum for Cords and Drawstrings

Seven questions were discussed in the Rapid Advice Forum for Cords and Drawstrings. Compilations of these questions and their responses have developed under the EMARS project.

More information can be found in chapter 3.4.7

Drafting and updating of miscellaneous documents

The coordinator has produced a number of documents to capture the conclusions from the Member States' discussion of important subjects:

- An inventory of clothes assessed by the Member States at the meeting.
- A checklist for assessing children's clothes with cords and drawstrings.

Awareness-raising and outreach activities

Presentations of the joint action were made on 5 separate occasions including 2 events organised by PROSAFE.

The joint action had 2 meetings with stakeholders in connection with meetings in the project group.

Activities were undertaken to reach out to Member States outside the joint action.

More information can be found in chapter 3.5 and 3.6.

Dissemination activities

Contributions (“articles”) about the joint action were produced in the PROSAFE newsletter.

The joint action produced 2 press releases on the results and findings of the activities.

To end, a half-day workshop was organised to discuss the results of the joint action. (A detailed description is given in chapter 3.5.5.)

3.2 Meetings

3.2.1 Project Meetings

Six project meetings have been organised by the joint action as foreseen in the original project plan:

12 November 2008 in Brussels

The purpose of the meeting was to present the joint action to the participants and to discuss the involvement of stakeholders and the interaction with the EMARS project. The participants also discussed testing and it was decided to organise the laboratory testing as joint testing. Moreover, the participants discussed if some sort of training could be organised. There was a general support to this idea and it was decided that all participants would bring garments to the next meeting so that everybody could discuss how they were to be assessed. This became a standing item on the agendas. In addition, each participant gave a brief update about the situation on the market in their respective Member State. (This was a standing item on all agendas throughout the project.)

14 January 2009 in Brussels

The participants spent a good part of the meeting discussing the assessment of different clothes to share their knowledge and to train each other.

The participants finalised the discussions on the call for tender and started the planning of the meeting with stakeholders in February. The idea of issuing a joint press release was also discussed and agreed.

25 February 2009 in Brussels

This meeting included a 3-hour session with stakeholders. They were informed about the action, its objectives and the key activities. Stakeholders were also invited to present their points of view. Moreover, Member States had the opportunity to benefit

from the presence of the convenor of CEN working group WG20, which was used for clarifying a number of questions to the standard.

The open part of the meeting was followed by a part for Member States solely. During this part, the Member States decided on the laboratory to be used in the action and they discussed the key messages to be conveyed in the first joint press release.

22 April 2009 in Brussels

The Member States continued their joint assessment of clothes and decided which clothes were to be sent to the laboratory for testing.

Furthermore, the Member States discussed a checklist in the form of a flowchart for checking of children's clothes.

3 September 2009 in Brussels

This meeting was used for discussing the test results that were received from the laboratory. The participants prepared a number of questions for the laboratory's assessments.

Furthermore, the Member States continued their own assessment of clothes and began the planning of the final workshop.

The meeting also allowed the Member States to reflect upon the lessons learned from the action.

21 January 2010 in Brussels

This meeting was used for commenting on the expert papers and the idea of creating a video to promote the expert paper. Stakeholders were invited to this meeting and two industry representatives attended.

The open part of the meeting was followed by a part open for Member States only. It was used for a final round of commenting of the other deliverables of the action.

3.2.2 Other Meetings Attended within the Framework of the Joint Action

The following meetings and events were attended by representatives from the joint action:

The Consumer Safety Network meeting, Brussels, January 2009.

The PROSAFE meeting, Brussels, 12 - 13 October 2009;

Consumer Safety Network, Brussels, 22 October 2009;

The PROSAFE Product Safety Week, day 2, Brussels, 2 December 2009;

CEN, London 4 - 5 March 2010.

Further to this, the project coordinator participated in several core group meetings organised under the EMARS or EMARS II projects.

3.3 Activities Undertaken at the National Level

3.3.1 Reporting of Data and Uncertainties

The main activity that the Member States undertook at national level in the context of the joint action on cords and drawstrings was market surveillance. This included border control in cooperation with customs and inspections in retail shops and at wholesalers, importers and manufacturers.

The Member States reported on this activity in two ways. Firstly, they submitted information on individual (non-conforming) garments in connection with project group meetings. This information went into the overview of non-conforming clothes for the benefit of the other participants. Secondly, they reported statistical information about the number of inspections, garments checked, etc. on a month by month or quarterly basis. Data from both sources have gone into the analyses in this chapter.

A certain level of uncertainty is introduced in the data because some data were reported in time frames other than quarterly or as accumulated figures for the entire project. Such figures have been divided proportionally over the relevant periods.

The detailed results from the Member States' inspection activities can be found in tables in Annex 2.

3.3.2 Statistics on Border Control Executed by Customs

The number of inspections carried out by customs is shown in figure 6. The figure shows that 61 consignments or containers have been checked by customs in the reporting period. All checks were carried out by customs in one of the participating Member States.

The total number of checks is likely to be higher according to verbal reports from several Member States about custom's activities. Furthermore, the participating Member States categorise their checks in different ways. In some Member States, customs carry out an initial inspection of the goods. This is recorded as "containers checked". In other countries such inspections are initiated by customs, but they are undertaken by the market surveillance authority and recorded as "inspections at EU-importers".

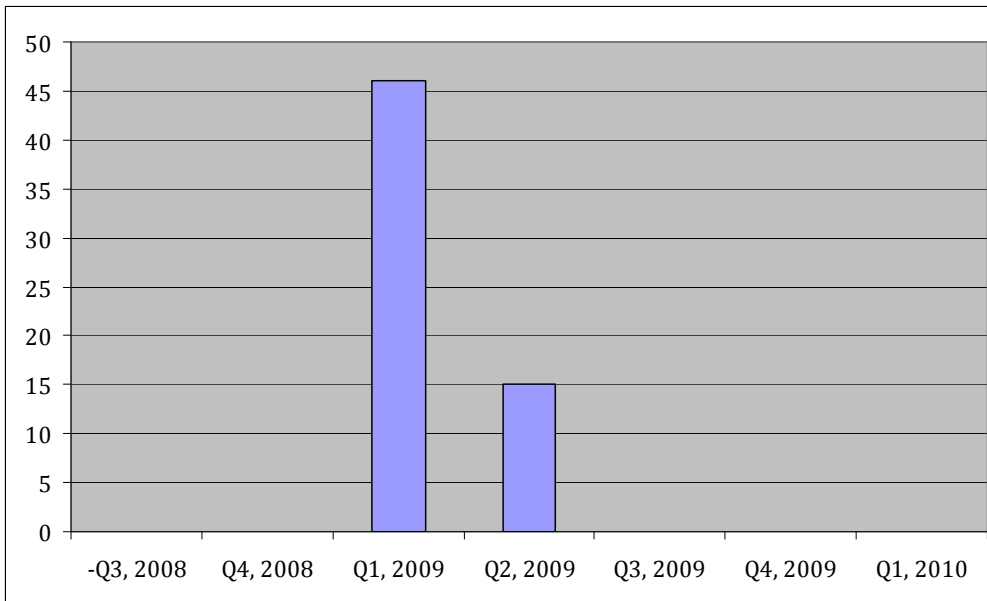


Figure 6. The figure shows the number of containers and consignments that have been checked by the customs authorities upon import to Europe. "Q1, 2010" only includes data up to 15 February 2010.

3.3.3 Statistics on Market Surveillance Inspections

The market surveillance authorities have been actively carrying out inspections in the market, mainly at retailers as shown in figure 7.

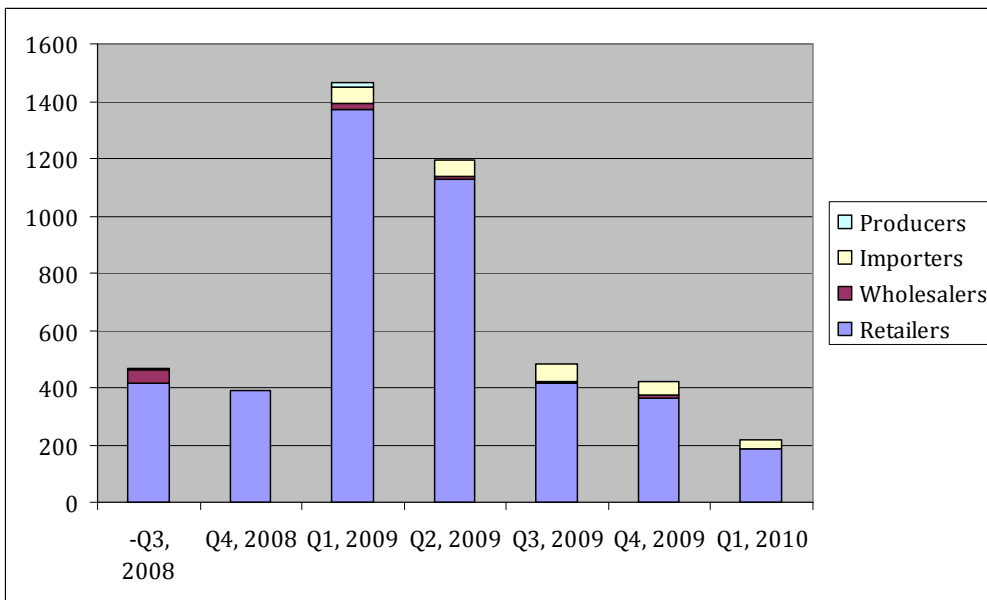


Figure 7. The figure shows the number of market surveillance inspections. "-Q3, 2008" includes checks carried out from 15th of August to 30th of September 2008. "Q1, 2010" only includes data up to 15 February 2010.

The figure shows that a total of 4.642 visits have been carried out by market surveillance authorities in the joint action. The figure also shows that the focus has been on retailers in the reporting period, as they account for 4.271 inspections corresponding to 92% of all inspections.

The division between inspections at the retail level and the other economic operators may seem odd, as market surveillance, in general, is found to be more efficient if it is addressed at the higher levels of the supply chain (ideally at the EU importer or the manufacturer, as they sit at the “root” of any problems). However, this is not automatically the case for the textile market for a number of reasons:

Several of the participating Member States indicated that their domestic markets are composed of a few large importers and a high number of small shops that sell all sorts of “no-name” clothes that are produced by small local manufacturers or imported by local importers, perhaps even as part of larger consignments with mixed goods. Therefore, it makes good sense to begin the inspections in these shops having the dangerous clothes withdrawn from the market and to begin the tracing of the origin of the clothes.

Often, brand owners operate their own outlets or chains meaning that even major operators can be efficiently targeted through visits in retail stores.

The number includes inspections of 20 web shops, i.e. websites where customers can purchase clothes. All 20 internet inspections were undertaken by the Danish authorities.

Figure 7 also shows that the number of visits fluctuated during the projects. The inspections in the joint action were only in full operation in 2009 and all the participating Member States were seen to carry out inspections in the first half of 2009, when the number of inspections was at its maximum. Only France did not participate in the inspections in this period. Their activities took place in 2008 and were seen to clear their market so further inspections could be considered unnecessary for the authority.

The inspections were scaled down in second half of 2009 in accordance with the plan of the joint action. It foresaw that the bulk part of the market surveillance activities were to be undertaken from January to August 2009. The figure however shows that some Member States decided to maintain and report a high level of activity in excess of what was planned.

The 371 inspections that have not been carried out at retailers or in border controls were divided up into wholesalers, importers and manufacturers as shown in table 5.

Economic operator	Number
Wholesaler, domestic importer	92
EU importer	251
Manufacturer	28

Table 5 Overview of inspections carried out exclusively from retailers by the joint action.

The data are somewhat uncertain as the categorisation of domestic importers (economic operators that purchase children’s clothes from an economic operator in another EU Member State) varies between “wholesalers” and “importers” between the Member States. This affects the data in those two categories but not the total number of visits.

3.4 Activities Undertaken by the Coordinating Body

These activities include coordination activities and coordinated activities undertaken by the coordinating body.

3.4.1 Joint Assessments of Clothes

A significant part of all project meetings were taken up by the joint assessments of clothes: the participants brought a number of clothes to the meetings and discussed them with the aim of reaching a common understanding of the risk. The discussions could have several outcomes:

1. The participants might agree on the assessment.
2. The participants could conclude that they were unable to assess the risk because it requires laboratory testing (for instance a measurement of elasticity).
3. The participants might have doubts or disagree on the interpretation of the standard. In this case the garment might be sent for testing at the laboratory.

The results were captured in a document that was available for the participants of the joint action. The aim was to produce a document that market surveillance officials (and customs officials) could consult when they came across cases they were unsure about. At the end of action, the document gave an overview of 108 garments. Figure 8 shows a page from the document.

No.	Description	Size	Origin	Photo(s)	Risk assessment
75	Skirt for girls. Length of strings: 18 and 19 cm	110 cm (5 yrs)	Korea		Cords do not comply with 3.4.2 (too long) and 3.1.1 (pearls at their ends).
76	Skirt for girls made of cotton. Length of strings: ~ 25 cm - 26 cm	11 yrs	Korea		Debatable if cords comply with 3.4.1. Sent for laboratory assessment. The laboratory apply clause 3.4.1. The skirt complies with the requirements.
77	Tricot for children. Lengths of strings when loosened ~ 25 - 27 cm	9 yrs	Korea		Fails to meet clause 3.5.3.
78	Breeches for boys, made of cotton. Length of strings ~ 11 cm.	3 yrs			Cords at the end of legs do not comply with 3.5.1. (Clause 3.5.3 does not apply as legs finish above the ankle.)

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Figure 8. An excerpt page from the document that captures information about the garments that have been assessed by the participants in the project meetings.

3.4.2 Selection of Laboratories

The plan for the joint action foresaw that a number of tests should be undertaken at a laboratory set up for joint testing. The idea being that all participants would use the same laboratory for all the testing. (This setup has been implemented in the joint action for lighters with success.) The potential benefits for the participants are primarily financial, as it should be possible to negotiate better prices when the total volume of tests in the joint action is negotiated.

The participants in the action were asked to provide the contact details of as many potential laboratories as possible. The result was that the call for tender was sent to 10 European laboratories on 20 January with the deadline set for 15 February, 2009. The call mentioned that the selection would be based on eight criteria (experience with the testing of cords and drawstrings in children's clothes, formal qualifications such as accreditation, price, delivery time, terms of delivery, ability to supply additional services to the joint action, ability to serve individual Member States with testing of cords and drawstrings in children's clothes outside the joint action, and the general impression of the laboratory's ability to undertake the assignment).

Seven of the ten laboratories responded by sending in quotations. Two of the quotations were received after the deadline so they were disregarded. The received quotations were examined by the project group and the result was that the Czech laboratory, Textilní

Zkušební Ústav, s.p. (The Textile Testing Institute) was selected to do the testing. This testing house was the least expensive laboratory that was accredited to test according to EN 14682 and was found to be capable of completing the assignment.

The joint action entered into contract with the laboratory in June 2009.

3.4.3 Joint Testing

The participants also discussed the scope for laboratory tests. Most of the tests required by the standard appeared to be so obvious that a market surveillance inspector could perform them themselves – perhaps getting help from colleagues or the standardisation committee as to the interpretation of the standard. A decision was taken to use the laboratory for “grey zone cases”, clothes with elastic cords, clothes with non-obvious faults and cases where the project group had doubts or disagreed on the assessment of the risk.

Testing was undertaken in the following way:

The Member State authorities presented suggestions for clothes to be tested to the project meetings.

The project group discussed the proposals and agreed on which clothes should undergo laboratory testing.

The individual authorities sent the selected clothes to the laboratory together with an identification of the garment.

When the test was done the test reports were sent to the coordinator and the authority that requested the test. The coordinator uploaded the reports to WebEx so that the other participants could follow up in their home territory.

The joint action went through 2 test rounds comprising a total of 10 tests.

3.4.4 Checklist

The participants decided to draft a checklist that a market surveillance inspector or a customs officer could use in their inspections of children’s clothes with cords and drawstrings. The intention was that such an inspection on site might reveal if the garment should be taken for a more detailed examination by an expert or if it would most likely comply with the requirements in the standard.

The checklist was drawn up in the format of a flowchart. Figure 9 shows the checklist.

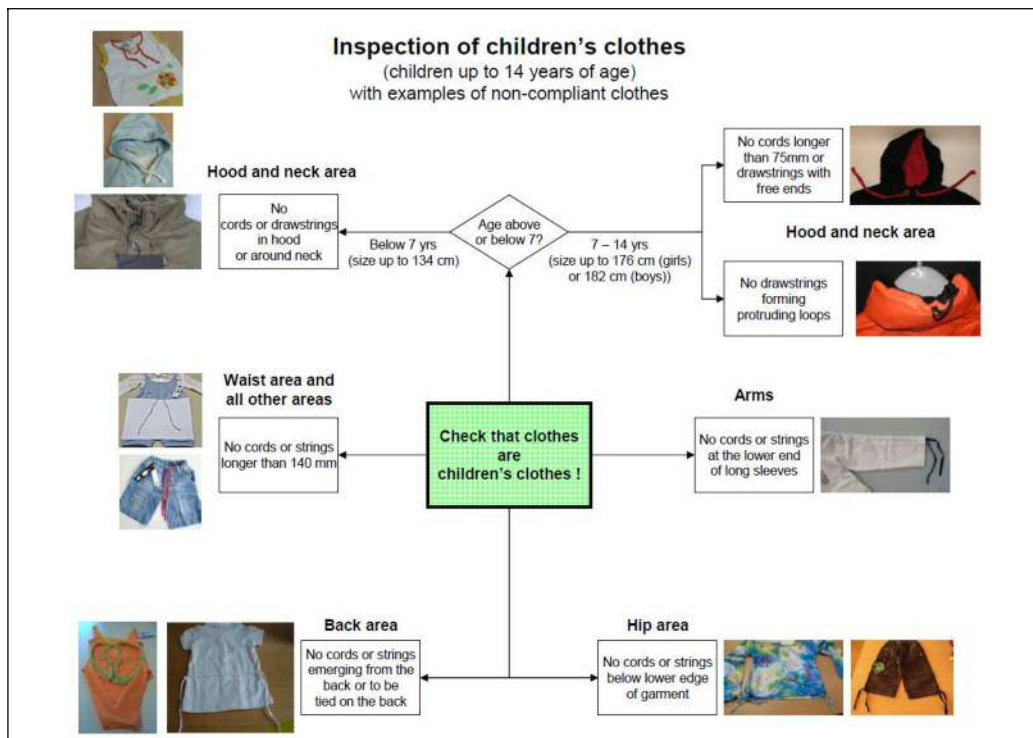


Figure 9. Checklist for on site inspections of cords and drawstrings on children's wear.

3.4.5 Assessing and Evaluating the Standard

When the participants examined the joint assessment of clothes in the joint action, they made a couple of observations on the standard:

The standard should provide clearer instructions on how to assess cords or drawstrings on $\frac{3}{4}$ sleeves

The standard could allow cords and drawstrings in the waist area as long as they are placed entirely inside the garment

The participants felt it would be useful if the standard addressed small parts on children's clothes

The participants came across clothes where shoulder straps serve decorative and functional purposes at the same time. Guidance on how to assess such designs was felt to be considered useful.

The standard apparently gives different requirements for the elasticity of functional cords and decorative cords on clothes for older children and for young children.

It was felt useful if the standard could include braces fixed to garments or to an explanatory note describing how they can be assessed.

It was noted that certain designs with adjustable braces did not comply with the standard even though the design was found to be common and accidents rare.

The participants found it difficult to apply the standard to a type of ski suit that could be adjusted to fit several age groups.

The group was wondering if fixed hoods would represent the same risk to the child as a cord or drawstring in the hood and neck area.

The participants noted that boots and caps with cords or drawstrings were excluded from the scope of the standard. It was felt useful to have some guidance on how to assess the risk associated with such products.

The participants have seen a number of examples of adjusting tabs on the back of hoods and found it difficult to apply the standard to such designs.

It was not clear from the standard how the measurement of the length of sashes and tied belts was to be done.

The observations were discussed with CEN on two occasions. Firstly, the convener of the standardisation working group CEN/TC248/WG20, participated in the first meeting between the project group and the stakeholders 25 February 2009. The consultant from the joint action presented a couple of observations at the meeting and the participants raised a couple of further questions related to specific garments. The convener commented the observations, answered the questions and clarified a number of misunderstandings or unclear issues from the Member States' side.

All the above observations were compiled in a document entitled "Grey zones in EN 14682" that was forwarded to CEN and presented at a meeting in the CEN working group in March 2010. (Please refer to chapter 3.5.3.)

3.4.6 WebEx Document Depository

A document depository was set up at the WebEx application that is also used by EMARS. All documents produced by the joint action and other relevant documents were uploaded to this depository.

The documents are accessible for all participants in the joint action and other people with access to the EMARS WebEx system.

3.4.7 The Rapid Advice Forum

A Rapid Advice Forum has been installed specifically to handle questions on cords and drawstrings. This tool has also proven to be invaluable in the context of the joint action on lighters and the EMARS project.

The idea behind the Rapid Advice Forum in general is that a market surveillance official can submit questions on issues related to market surveillance and receive informal advice from colleagues. The advice is informal and non-binding, meaning that the person who made the

request is free to do use the advice in whatever way s/he finds suitable. The person that initiated the request is responsible for the conclusion and its application and the individual colleagues who responded to the request bear no responsibility whatsoever.

All members of the joint action were included in the Rapid Advice Forum.

The Rapid Advice Forum handled seven questions on garments with cords and drawstrings:

Assessment of the risk in swimwear.

Which clauses to apply to assess two jackets.

Ascertaining the definition of braces.

The correct assessment of strings on sleeves.

A request for accident statistics.

The risk assessment of baby clothes.

Assessing the risk of a dress with a drawstring in the front.

3.4.8 Administration of Action

The joint action applied a dashboard to facilitate the follow up of the financial situation. An example is shown in figure 10.

The dashboard consists of four graphs:

The speedometer (upper left) shows the Member States' contributions in kind. The value "30%" is highlighted as it is (close to) the target value.

The lower left bar graph compares the contribution in kind from each Member State to the budgeted contribution.

The upper right bar graph compares the expenses and income to the budget.

The lower right bar graph counts the number of working hours for each participant.

The dashboard was discussed at all project meetings.

Financial follow-up (dashboard)

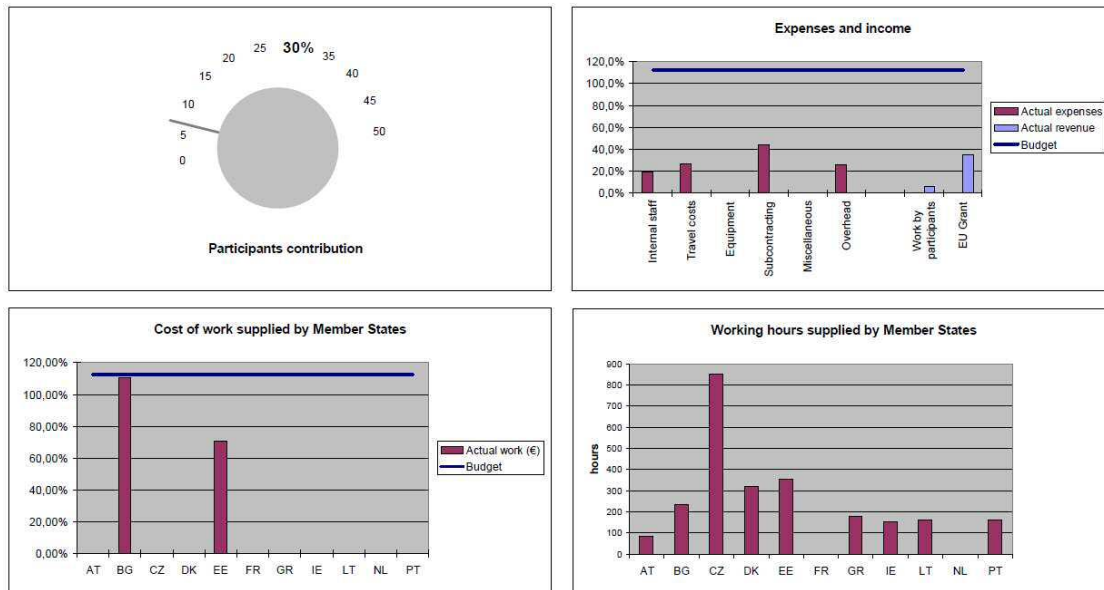


Figure 10. The “dashboard” that is used by the project group to obtain a quick overview of the financial situation in the joint action. (Please note that the example reflects the situation as of September 2009 when reporting was still incomplete.)

The participants also discussed an overview of received timesheets at each meeting. This was done to encourage a continuous collecting of timesheets during the joint action.

3.4.9 Synergies with other PROSAFE Activities

The joint action was coordinated with the EMARS project and the EMARS II project; two other PROSAFE actions. The participants have been presented for the best practices on planning and implementation of market surveillance projects that were described by EMARS WP3 in “The book”[5] and were encouraged to report back their experience from their application of these practices in their national projects.

The joint action on cord and drawstrings benefited directly from a number of outcomes from the EMARS project:

The idea of doing joint testing, i.e. to subcontract all testing to one or a few test laboratories came out of the EMARS workshop in London in March 2007 and was taken up in the joint action for lighters. The idea was further explored in the joint action on cords and drawstrings.

The participants used the Rapid Advice Forum to discuss miscellaneous issues related to cords and drawstrings on children's clothes.

Documents from the EMARS WP1 knowledge base served as background papers for the joint action. (One example is the guidelines for drawstrings on children's upper outerwear issued by CPSC [4].)

The WebEx website set up by the EMARS project served as a platform for storing the documents created by the joint action.

After the finalisation of the EMARS project in December 2008 the joint action on cords and drawstrings continued feeding in to two of the tasks in the EMARS II project:

Task A develops guidelines based on The book from the EMARS project. The joint action contributed to the work with the checklist for assessing children's clothes with cords and drawstrings that will be included within the guideline that Task A is developing.

Task B develops guidelines for carrying out joint actions and cross-border cooperation. The most prominent example of best practices from the joint action on cords and drawstrings that went into this work was the idea of carrying out joint assessments to share experiences between Member States.

3.5 Dissemination activities

3.5.1 Press Releases

Two press releases have been produced in the context of the joint action.

Press release 1 April 2009

The press release was published to raise people's awareness that the joint action on cords and drawstrings had started. The press release mentioned that a number of accidents occur every year because of clothes with dangerous cords and drawstrings and it presented 7 pieces of good advice to the consumer on what to look out for when purchasing or making children's clothes.

Eight of the participating Member States published the press release on their national websites. It was also published on the website of the EMARS project and the Commission included a link to it from their website.

Press release 30 November 2009

The press release was issued to mark the final conference of the joint action. It described the results of the action and repeated the recommendations on children's clothes.

It was published on the website of nine of the Member States and on the new PROSAFE website.

3.5.2 Expert Papers and Video

At the meeting in September 2009, it was suggested that a guidance document be produced for businesses aimed at describing the most common and dangerous non-conformities that the Member States had found in their work in the action.

The idea was presented at the workshop in November and discussed with the stakeholders. The result was that the idea was further developed and it was suggested to explore the possibility of producing a video to supplement the guidance document. This video is produced in cooperation between the European Commission's video production team and the Member States that provided clothes for the recordings.

A draft paper was discussed with CEN/TC248/WG20 that suggested modifying the document so that it highlighted the risks posed by non-compliant garments using examples from the Member States' activities. The document should furthermore refer the reader to the standard EN 14682 for all the safety requirements.

3.5.3 Outreach to CEN

The participating Member States made a number of observations when using the standard in their joint assessments of garments during the meetings in the action. Other concerns were also raised as a result of the laboratory tests. (Please also see chapter 3.4.5.)

These observations were compiled in a document "Grey zones in EN 14682" that was presented and discussed with CEN TC248/WG20 at their meeting in March. The meeting gave rise to a fruitful and lively discussion and clarified several questions. Some observations were seen to build on misunderstandings or misinterpretations of the standard, and a couple of the observations were taken onboard by the working group in their next revision of the standard. Furthermore, CEN decided to use some of the observations in a foreseen technical guideline document on the application of the standard.

The meeting was in general seen to underline the usefulness for both market surveillance and standardisation of a closer cooperation and exchange of experiences between the two parties.

3.5.4 Meetings where Presentations of the Joint Action have been given

Presentations of the joint action were given at the following international meetings:

Consumer Safety Network meeting, Brussels, January 2009;
The CEO of PROSAFE gave an update of the progress of the joint actions including brief presentation of the joint action on cords and drawstrings.
The PROSAFE meeting, Brussels, 12 - 13 October 2009;
The coordinator gave an update of the progress of the activities in the joint action.
Consumer Safety Network, Brussels, 22 October 2009;
The CEO of PROSAFE presented the progress of the activities in the joint actions including a 5 minute presentation of the joint action on cords and drawstrings.
The PROSAFE Product Safety Week, day 2, Brussels, 2 December 2009;
The coordinator presented the best practices that were identified in the joint actions including those from the joint action on cords and drawstrings.
CEN, London, 4 - 5 March 2010;
The coordinator presented the findings from the action including in particular the participants' experiences with the application of the standard EN 14682 for cords and drawstrings on children's clothing.

3.5.5 Final Workshop

A half-day workshop was organised on the 30 November to inform interested parties about the results of the joint action and to discuss the findings and experiences with stakeholders. The workshop was attended by some 25 people from market surveillance authorities, businesses, consumers and standardisation.

The program was divided into two major parts. The first part included the opening addresses from PROSAFE and the European Commission and two presentations of the main findings, achievements and experiences. The second part emphasised dialogue with stakeholders and included a number of presentations to trigger the discussions. So the attendees listened to presentations from the perspectives of two of the Member States that had participated in the action, businesses as represented by Eurocommerce, the consumers and CEN's perspective, respectively.

The industry commented the involvement of stakeholders. It was thought positive that the joint action had worked to involve stakeholders and business but it became clear that the involvement could be improved; businesses had known little about what to expect from the involvement and similarly, they had not been informed of the results before the workshop. Industry wanted to be involved, to be kept informed about any developments, and to stay on top of the action. It was acknowledged that joint actions represented a unique opportunity for sharing experiences between industry and market surveillance.

The consumer's perspective was presented by ANEC. They began their work several years ago triggered by the number of accidents involving younger children who became

entrapped in playground equipment or older children involved in accidents on bicycles. ANEC stressed that Member States ought to participate in standardisation. Furthermore, they pointed to the strong need for better injury data.

The representative from CEN stressed the need for input from market surveillance to standardisation and urged the Member States to participate in the standardisation work. CEN also invited the Member States to submit questions on the interpretation of the standard. Furthermore, it was mentioned that CEN was working to revise EN 14682 and welcomed input from the joint action. It was proposed that PROSAFE participated in the next meeting to present the findings of the action.

The following panel discussion produced a number of good ideas, including:

Business could help with contacts in China for PROSAFE's outreach activities.

It was noted that market surveillance and big European operators share the same interest in communicating at the most centralised level, i.e. the European headquarters.

All presentations from the workshop are available on the public part of WebEx.

3.6 Awareness-Raising Activities

The joint action has undertaken numerous activities to encourage Member States outside the action.

3.6.1 Member States and other countries outside the joint action

One Member State, Spain, participated in the activities of the joint action (e.g. through participation in project group meetings) even though they were outside the financial scheme of the joint action. Moreover, Belgium and Cyprus expressed an interest in being involved and kept informed of the results, so they received the information that was produced by the joint action.

Turkey also took part in the activities in the action by attending several project meetings to learn about the findings from the participants and to report back the results of their follow-up activities with Turkish manufacturers. (Turkey is a major exporting country of children's clothes to the EU.)

In total, 12 Member States were actively involved in the joint action (inside or outside the financial scheme) and the joint action attracted the interest of 2 more Member States plus

Turkey. Additionally, contacts were established with the CPSC in the United States but they did not regularly receive the material from the joint action.

3.6.2 The European Commission

DG SANCO of the European Commission was the most important stakeholder for the joint action. Therefore, representatives from DG SANCO were invited to participate in every project group meeting and brief progress reports were sent to the Commission every three months. In addition, updates were produced when requested by the Commission (e.g. for reporting to meetings in the Consumer Safety Network or the GPSD committee).

3.6.3 Stakeholders

The joint action wanted to involve stakeholders, i.e. businesses, consumers and standardisation. This involvement took place in the form of a three-hour meeting with stakeholders that was organised in conjunction with the project group meeting 25 February. Representatives from Eurocommerce, ANEC and CEN attended the meeting. The main purpose of the meeting was to inform stakeholders about the joint action. The participants of the joint action also benefited from CEN being present, by clarifying a number of questions on the interpretation of the standard.

Stakeholders also attended and participated actively in the final workshop 30 November 2009, as mentioned in chapter 3.5.5. One outcome of this workshop was that stakeholders became more closely involved in the commenting of the expert papers that were drawn up by the joint action (see chapter 3.5.2).

3.7 Differences between Work Program and Activities Actually Undertaken

Table 6 below compares the activities foreseen in the work programme as stated in the grant agreement [1] to those actually undertaken in the joint action.

Planned Activity	Activity Actually Undertaken
Market Surveillance Activities	
Check of children’s clothes at wholesalers and retailers.	4.271 inspections were carried out at retailers. 92 inspections were carried out at wholesalers (including domestic importers). Please also see chapter 3.3.3.

Planned Activity	Activity Actually Undertaken
Check of children's clothes primarily at importers and manufacturers.	A total of 251 inspections were carried out at importers and 28 inspections at manufacturers. Please also see chapter 3.3.3.
Inspections of consignments with children's clothes at the border.	Customs checked 61 consignments or containers. Please also see chapter 3.3.2.
Organise and execute laboratory testing of 75 garments according to EN 14682	One laboratory was selected after a call for tender. A contract was signed with the laboratory. Procedure for coordinating tests and submitting garments to the laboratory were laid down. Ten garments were tested at the laboratory. Please also see chapters 3.4.2 and 2.3.
Exchange of information on assessed garments.	The participants reported garments that were expected to be of common interest to the project group to the coordinator before each meeting. If the garment was also examined at the project meeting the conclusion was captured in the inventory of garments. Please also see chapters 3.4.1 and .
Coordination Activities	
Experiences from previous actions in the Member States are collected.	Member States were invited to report their previous activities with cords and drawstrings at the first project meeting. (An overview is given in chapter 1.2.4.) All later project meetings included sessions where all participants brought various garments to the table for a joint assessment. This allowed Member States with less experience in assessing children's clothes to benefit from the experience of Member States with longer records in this field.
Update procedures, inventories and forms	The coordinator has drafted or updated the following documents, amongst others, during the action: <ul style="list-style-type: none"> Inventory of garments assessed by the participants. Instruction for submitting clothes to the laboratory. Checklist for checking children's clothes. A form for statistical data. Flowchart for coordinated testing.

Planned Activity	Activity Actually Undertaken
Possibilities for involvement of the Customs are explored.	Customs are involved in some of the participating Member States. A checklist for inspection of garments have been drawn up to aid e.g. customs in their assessment of clothes.
Answer questions on coordination issues	A Rapid Advice Forum on cords and drawstrings was set up. 7 questions were answered by this forum or by the coordinator. Please also see chapter 3.4.7.
Organise, prepare and participate in 6 meetings	6 project meetings were organised. Please also see chapter 3.2.1.
Organise, prepare and participate in the final workshop	A half-day workshop was organised 30 November 2009 with some 25 attendees. Please also see chapter 3.5.5.
Prepare quarterly progress reports	Reports were submitted 10 January 2009, 27 April 2009, 3 August 2009, 20 October 2009 and 14 February 2010.
Prepare interim report	The technical interim report covering the period from 15 August 2008 to 30 April 2009 was issued 31 May 2009.
Prepare final report	The final technical implementation report from the joint action will be issued 31 May 2010.

Activities not foreseen in the Original Work Programme	
Activity	Detailed description
Production of “expert paper” and video	The participants drew up an “expert paper” that highlights the risks posed by non-compliant garments using examples from the joint action. A supporting video is produced in cooperation with the European Commission. Please also see chapter 3.5.2.

Activities not foreseen in the Original Work Programme	
Activity	Detailed description
Outreach to CEN	<p>The joint action very successfully reached out to CEN and in particular the working group WG20 under TC248. The activities included:</p> <p style="padding-left: 40px;">Advice from the convener of the working group at the project group meeting 25 February 2009.</p> <p style="padding-left: 40px;">A presentation at the WG20 meeting in March 2010 of a number of observations on the standard. (Please also see chapter 3.4.5.)</p> <p style="padding-left: 40px;">Further involvement of WG20 in the commenting of the expert papers.</p>
Evaluation of the standard EN 14682	<p>The participating Member States compiled a memo with 12 observations on the standard EN 14682 made in their joint assessments of garments. This document was shared with CEN/TC248/WG20.</p> <p>Please also see chapter 3.4.5.</p>
Checklist for inspections of children's clothes with cords and drawstrings.	<p>The participants drafted a checklist that a market surveillance inspector or a customs officer could use in on-site inspections of children's clothes with cords and drawstrings to decide if the garment should be taken for further examination.</p> <p>Please also see chapter 3.4.4.</p>
Press releases	<p>2 press releases were published 1st of April 2009 and 30th of November 2009.</p> <p>Please also see chapter 3.5.1.</p>

Table 6. Overview of activities foreseen in the working program and activities actually carried out.

4 CONCLUSION

4.1 Analysis of Results

The joint action was expected to bring about a significant decrease of children's clothes with unsafe cords or drawstrings on the market. The analyses in chapter 2.2.2 indicate that this objective was achieved. The joint action appears to have incurred a substantial and steady decrease of non-compliant clothes on the market in the 11 participating Member States. This can be seen from the fact that the share of non-compliant clothes was 15 – 19% in the first rounds where Member States sampled garments. The share fell to 6 – 10% in the last rounds.

The decrease is supposed to be even more significant in reality as the market surveillance inspectors presumably became more competent during the action. Even if the intention was that the authorities should record the total number of clothes checked in their inspections, it seems likely that the inspectors focused their attention on the non-compliant garments and that this focus increased as their competences increased during the action.

Still the results are significant and the reports show that measures have been taken (by the authorities or by the economic operators themselves) against more than 2.000 garments. The joint action contributed to this by producing tools for the market surveillance inspectors like the checklist for inspections of clothes. Furthermore the participants carried out joint assessments of more than 100 garments at the meetings which meant that a certain harmonisation in the risk assessment was achieved across the participating Member States. These results were also conveyed to the national authorities by the people attending the meetings. Furthermore the results were communicated to Member States outside the joint action via RAPEX notifications of the garments presenting a serious risk to the consumer.

The participating Member States also issued two press releases with common key messages on the results and advice to consumers. The intention was to raise the awareness of the general public of the risks and safety requirements for cords and drawstrings on children's clothing. This was successful, as the press releases were picked up well by media in the Member States.

The participants made a couple of observations on the standard during their work in the joint action. These observations were compiled in a note of "grey zones" that was shared with the committee that had prepared the standard on two occasions. Firstly, the convener of the committee participated in a meeting with the project group where she commented the observations, explained the background for the standard and answered questions from

the Member States. Secondly, the document with the “grey zones” was discussed with the CEN working group at one of their meetings. The meeting gave rise to a fruitful and lively discussion and a couple of the observations were taken onboard in the next revision of the standard or in a foreseen technical guideline document on the application of the standard. The general impression was that such meetings are very useful for both market surveillance and standardisation.

The aim of the action was to reaching a non-compliance level of maximum 2% non-conforming clothes on the market. The analyses in chapter 2.2.2 also indicate that this may not have been met. This raises the question of whether the goal is too ambitious or too difficult to measure? This joint action used the number of non-conforming clothes found by the participants divided by the number of inspected clothes as an indicator of the non-compliance level on the market. The quality of this indicator is debatable however, as the market surveillance authorities’ sampling is often biased (the inspectors focus on potentially unsafe clothes) and it does not take into account that there may be differences between the European market and the markets in the participating Member States. Furthermore, the indicator is based on models and it does not take market shares into account. This may be problematic as all these presumptions tend to drive up the non-compliance level.

4.2 Lessons Learned - Methodology

The market for children’s clothes appears to consist of a few big pan-European operators (that are well aware of the standard and the safety requirements) and a large number of small, local operators with a more sparse understanding of the requirements. Therefore, it seemed successful to use a high number of inspections to enforce the safety requirements in this joint action. This method produced a side-effect that the inspections could be used for educating the economic operators; most of the serious non-conformities are easy to detect and the risk is easy to explain and visualise for the economic operator. On the other hand, the cascading effect from one country to another appeared to be small, if existent at all.

The cross-border cooperation proved its usefulness in other ways. Firstly, the “desk top testing” undertaken at the project meetings was seen to be a successful way of sharing expertise and mutual training in the standard. Furthermore, it reduced test costs dramatically. This idea can most certainly be used in the case of other products where it is important to exchange experience and align the perception of risks between participating Member States. Secondly, the participants used the exchange of information on progress in the national activities at each meeting to benchmark against each other.

The issuing of joint press release was also seen to be successful. The coordinated publishing stressed the European perspective and increased the impact and the visibility largely.

Moreover, it caused less work for the participants to produce the key messages jointly and translate them for their own use. This idea can be used more generally in joint actions (and has been recorded by PROSAFE as best practices).

As regards the involvement of Member States in the action and outreach to Member States outside the action, the participants recognised finding ways to galvanize the interest of more Member States to participate in joint actions as an issue. In general, joint actions experience problems reaching out to Member States that do not participate which, for instance, means that tools and procedures that are developed by the participants are not utilised outside the action. This means that other Member States do not benefit from the experiences gained in the joint actions, which could lead lower the efficiency of their activities. It would also lead to a risk for lack of harmonisation across Europe of approaches, measures, etc.

Further to involving more Member States it was also considered important to involve authorities in countries that produce the products concerned. This joint action benefited from having the Turkish authorities onboard because it enabled quicker communication of the findings from the joint actions to manufacturers outside the EU. This option could be explored further in future joint actions that may envisage using tools like training seminars in big manufacturing countries as a means to increase the conformance level on the European market. PROSAFE has taken onboard this recommendation in the 2009 proposals and foresees visits to China as part of the project.

Finally, the participants have also made the observation that there appears to be a need for European-wide information activities when a new standard is published (or an existing standard is revised). As regards the standard for cords and drawstrings, it was seen to be necessary to repeat this information regularly to ensure that new generations of designers, authorities, parents and economic operators are constantly aware of it. It was not obvious for the participating authorities who should undertake this job- the national authorities, the European Commission – CEN – or PROSAFE. It was noted however, that the common press release was one means for providing such information.

BIBLIOGRAPHY

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

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7. Statistics over RAPEX notifications. Published by the European Commission, DG SANCO, on the website http://ec.europa.eu/consumers/safety/rapex/stats_reports_en.htm.