



**European Commission**  
**DG JUST,**  
Directorate-General for Justice and Consumers  
Product and Service Safety Unit **Unit E.3**  
Rue Belliard 232, Office 06/018  
B-1040 Brussels /Belgium

Brussels, 20 April 2016

**Subject: EUROPEAN STANDARD**  
**Safety requirements for children footwear**

**Czech Footwear and Leather Association - CFLA fully agrees and has the same opinion as European Association for the co-ordination of consumer representation in nonprofit organizations – ANEC (posted you a disagreement from 14 March 2016 / ANEC – CHILD 2016-G-035)**

Referring to the last CSN meeting on 2. February 2016, members and observers were asked to cement on the proposal from the COM:

- not to proceed with the work on safety requirements for children footwear for the time being or
- to proceed with the work on safety requirements for children's footwear addressing only hazards for children up to 3 years of age and extend it to children's clothes (focusing on choking and strangulation hazards).

**The Ministry of Industry and Trade and the Trade Union of the Czech Republic, I was appointed as an international expert in the formation of European Standard Safety requirements for children footwear. For the creation of this standard, we have cooperated with experts from Tomas Bata University in Zlin, who also contributed to the drafts and documents for this standard. All comments and suggestions are sent in May 2015 to Mrs. Vasil'ová's Ministry of Industry and Trade in Czech Republic.**

Since then we have not been contacted and we have not received any suggestions from experts from other EU countries.

**CFLA strongly disagrees with the Commissions proposed way forward for the following reasons:**

- **no opportunity for discussion the pros and cons to come to a consensus**

The replies received from the members of the small expert group and from CSN members were never shared/ distributed. No paper summarizing the experts' positions was sent out and no discussion took place with the small expert group to come to a consensus. Instead, the only information the COM provided was that there was no consensus about hazards for

children above 3 and also no consensus about chemicals. We would like to see all the replies and ask for these replies to be discussed by the expert group.

On the 7<sup>th</sup> slide of the COM's presentation the October 2015 CSN meeting it says that that a list of hazards and a new draft will be shared. As far as we know, this was not done.

**This takes us very concerned because there is a demonstrable harm children's feet due to lack of technical requirements that children's shoes and is still no European standard!**

- **Age requirements**

**We strongly support limiting some hazards only for shoes for small children up to 36 months. The age limit for shoes to be considered as "Children shoes" is to be 15 years.**

As children under the age of 3 tend to put everything in the mouth, biological hazards and hygiene requirements are equally important to be addressed.

- **Sizes requirements**

**CFLA also recommend Sizes group and range of the size numbers in mm:**

- Children's infant's footwear for infants, from 105 to 140
- Children's footwear for toddlers, from 145 to 165
- For preschool age, from 170 to 190
- For school age, from 195 to 230

- **Construction requirements**

**For children's shoes completely lacking technical requirements.**

Construction requirements of children's shoes: right construction of lasting insole, shape height and stroke of the toe shoes, heel height, vertical position of the heel, height of the upper in the heel part, proper size (length and width) marking shoes.

Construction and orthopedic requirements are very important for shoes for children under 3 and should be covered as well.

- **Chemical requirements**

In its position paper „Hazardous chemicals in products – The need for enhanced EU regulations „ (June 2014) CFLA considered that „*the present specific European regulatory provisions for chemicals in (consumer) products, particularly in articles, are insufficient* “. Further, it was stated that REACH does not, and will not, compensate for these deficits because articles – particularly imported ones – are barely covered“ for a number of reasons which are not here discussed. CFLA insisted that "a systematic approach to address chemicals in products relevant for consumers needs to be developed". This holds true also for shoes in general, and shoes for children, in particular. It should be noted that there are very few restrictions concerning chemicals in shoes in REACH (such as the limits on chromium VI or azocolourants and azodyes).

- **Extending the safety requirements to children's clothing:**

Safety requirements for children's clothing should be addressed separately from footwear requirements.

**FUNDAMENTALLY DISAGREE WITH THE SUGGESTION FOR DISCARDING MAKING EUROPEAN STANDARDS FOR CHILDREN'S FOOTWEAR.**

Please contact us with your statement.

Kind regards

**Ing. Radim Kocourek, Ph.D.**

Expert for children footwear

**Czech Footwear and Leather Association CFLA**

**Tř. T. Bati 5267, 760 01 Zlín, Czech republic**

Tel./fax: +420 577 525 230, Mob.: +420 724 613 910

**kocourek@coka.cz, coka@coka.cz <http://www.coka.cz>**

**ČESKÁ OBUVNICKÁ  
A KOŽEĎELNÁ ASOCIACE**

**Tř. T. Bati 5267**

**760 01 Zlín**



**Notified Czech Institutions:**

**1. Mrs. Mgr. Lenka Vasil'ová**

Department of technical harmonization and consumer legislation

Ministry of Industry and Trade

Na Františku 32, 110 15 Praha 1, Czech Republic

**2. Mrs. Marta Novotná**

president of Confederation of Commerce and Tourism

Těšnov 5, 110 00 Praha 1, Czech Republic

---

Česká obuvnická a kožedělná asociace, Tř. T. Bati 5267, 760 06 Zlín - Czech Republic

Tel./fax: 00420 577 525 230, tel.: 00420 577 435 411

IČO: 26982510 DIČ: CZ 26982510

[www.coka.cz](http://www.coka.cz) e-mail: [coka@coka.cz](mailto:coka@coka.cz)