CHILDREN’S SLEEPWEAR STANDARD OPERATING PROCEDURE

Table of Contents

1 SCOPE .................................................................................................................................................. 2

2 FLAMMABILITY TESTING REQUIREMENT ....................................................................................... 2

3 TIGHT-FITTING (SNUG FITTING) SLEEPWEAR - REQUIREMENT .................................................. 3

4 TIGHT-FITTING (SNUG-FITTING) SLEEPWEAR – FIT APPROVAL ............................................... 8

5 TIGHT-FITTING (SNUG-FITTING) SLEEPWEAR – RECORD KEEPING REQUIREMENT ............... 8

6 LOOSE-FITTING (FLAME RESISTANT) SLEEPWEAR - KROGER POLICY .................................. 9

7 LOOSE-FITTING (FLAME RESISTANT) SLEEPWEAR – FLAMMABILITY TESTING REQUIREMENT ................................................................................................................................. 9

8 LOOSE-FITTING (FLAME RESISTANT) SLEEPWEAR – ASSIGNING FPU AND GPU NUMBERS .................................................................................................................................................. 11

9 LOOSE-FITTING (FLAME RESISTANT) SLEEPWEAR – RECORD KEEPING REQUIREMENT .................................................................................................................................................. 13

10 LOOSE-FITTING (FLAME RESISTANT) SLEEPWEAR – LABELING ............................................... 14

11 REFERENCES ........................................................................................................................................ 16
1 SCOPE

1.1 This document establishes the proper procedure for executing Kroger’s Children’s Sleepwear program as it relates to children’s sleepwear flammability standards and requirements. It is only intended as a summary. For specific details, refer to 16 CFR 1615, 16 CFR 1616, 16 CFR 1610, and 16 CFR 1611.

1.2 Children’s sleepwear means apparel sized 0-14, such as nightgowns, pajamas, or similar or related items such as robes, intended to be worn primarily for sleeping or activities related to sleeping.

1.3 Diapers and underwear are exempt from the 16 CFR 1615 and 16 CFR 1616 Flammability Standards.

1.4 Infant garments sized 0-9 months is also exempt from 16 CFR 1615 and 16 CFR 1616 Flammability Standards provided that:

1.4.1 A one piece garment, does not exceed 64.8 cm (25.75 inches in length or a two piece garment, has no piece exceeding 40 cm (15.75 inches) in length.

1.4.2 It complies with 16 CFR 1610 and/or 16 CFR 1611 Flammability Standards

1.4.3 It bears a label stating the size of the garment, expressed in terms of months of age. If the label is not visible to the consumer when the garment is offered for sale at retail, the same information must appear legibly on the package of the garment.

1.5 This document shall be used along with KRGR-TXT-001 – Apparel Testing Program.

2 FLAMMABILITY TESTING REQUIREMENT

2.1 Kroger’s children’s sleepwear must be tested per 16 CFR 1615 & 16 CFR 1616 standards. It is the supplier’s responsibility to ensure that all testing has been done prior to shipment.

2.2 Refer to Table 1 below to determine which flammability testing standard is appropriate for each type of garment.

<table>
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<th>Product Type</th>
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<th>Must meet Tight-Fitting Specs per 16 CFR 1615 and/or 16 CFR 1616</th>
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<tr>
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Table 1
3 TIGHT-FITTING (SNUG FITTING) SLEEPWEAR - REQUIREMENT

3.1 Loose edges that extends the garment such as drawstrings and ties are not allowed.

3.2 Pockets must be small and self closing and cannot have flaps for closure.

3.3 Lettuce edgings/stitching that create a ruffle design at the edges of the garment is not allowed.

3.4 Has no item of fabric, ornamentation or trim, such as lace, appliques, or ribbon, which extends more than 6 mm (1/4 inch) from the point of attachment to the other surface of the garment.

3.5 Buttons or snaps around the ankle or wrist area to “loosen” the garment is not allowed.

3.6 Must comply with all applicable requirements of the Standard of Flammability of Clothing Textiles (16 CFR 1610) and/or the Standard for the Flammability of Vinyl Plastic Film (16 CFR 1611).

3.7 Must bear a hangtag (Image 1) stating “For child’s safety, garment should fit snugly. This garment is not flame resistant. Loose-fitting garment is more likely to catch fire.” The hangtag must measure 1 ½ inch x 6 ¼ inches. The text must be enclosed in a text box that measure 1 inch x 5 ¾ inches and must be in 18 point Arial/Helvetica font. The hangtag must have a yellow background and black lettering. The color yellow must meet the specifications for Standard Safety Yellow (Hue 5.OY; Value/Chroma 8.0/12) as described in American National Standard ANSI Z535.1-1998, Safety Code, p.6, under Munsell Notation. One side of the hangtag must display only this message. The reverse side of the hangtag may display sizing information, but otherwise must be blank. The text must not be obscured by the hole provided for attaching the hangtag to the garment and must be prominently displayed on the garment (no obstruction).

Image 1

3.8 If the garments are sold in packages, the package must have a label with the same language that would appear on the hangtag (Section 3.7). The label must have a text box that measure ¾ inch x 3 ¾ inches. The text must be 11 point Arial Helvetica in black lettering against a yellow background. The packages must be prominently, conspicuously, and legibly labeled with the required message. The package label may be adhesive.

3.9 Must bear a label (Image 2) stating “WEAR SNUG-FITTING, NOT FLAME
RESISTANT.” The text must be printed on the front of the sizing label located on the center back of the garment and must be immediately below the size designation. The text must be a minimum of 5 point sans serif font in all capital letters and must be set apart from other label text by a line border. The text must contrast with the background color of the label. The label must not be covered by any other label or tag.

3.10 Must comply with the sizing requirement and measurement (Table 2) specified in 16 CFR 1615 and 16 CFR 1616. If the garment is sized for a range of sizes, e.g. 2T-3T, the sizing requirement must meet the lower size (in this case, size 2T).

3.10.1 Measure the dimensions on the front of the garment. Lay garment, right side out, on a flat horizontal surface. Smooth out wrinkles. Measure distances as specified below and **multiply them by two**. Measurements should be equal to or less than the maximum dimensions given in the standards (Table 2).

3.10.2 Chest—measure distance from arm pit to arm pit (A to B) as in Diagram 1.

3.10.3 Waist—See Diagram 1. One-piece garment, measure at the narrowest location between arm pits and crotch (C to D). Two-piece garment, measure width at both the bottom/ sweep of the upper piece (C to D) and, as in Diagram 3, the top of the lower piece (C to D).

3.10.4 Wrist—measure the width of the end of the sleeve (E to F), if intended to extend to the wrist, as in Diagram 1.

3.10.5 Upper arm—draw a straight line from waist/sweep D through arm pit B to G. Measure down the sleeve fold from G to H. Refer to table below for G to H distances for each size. Measure the upper arm of the garment (perpendicular to the fold) from H to I as shown in Diagram 1.

3.10.6 Seat—Fold the front of the pant in half to find the bottom of the crotch at J as in Diagram 2. The crotch seam and inseam intersect at J. Mark point K on the crotch seam at 4 inches above and perpendicular to the bottom of the crotch. Unfold the garment as in Diagram 3. Measure the seat from L to M through K as shown.

3.10.7 Thigh—measure from the bottom of the crotch (J) 1 inch down the inseam to N as in Diagram 2. Unfold the garment and measure the thigh from the inseam at N to O as shown in Diagram 3.

3.10.8 Ankle—measure the width of the end of the leg (P to Q), if intended to extend to the ankle, as in Diagram 3.

3.11 Has sleeves which do not exceed the maximum dimension for the upper arm at any point between the upper arm and the wrist, and which diminish in width gradually from the top of
the shoulder (point G in Diagram 1) to the wrist

3.12 Has legs which do not exceed the maximum dimension for the thigh at any point between the thigh and the ankle, and which diminish gradually in width between the thigh and the ankle

3.13 In the case of one-piece garment, has a width which do not exceed the maximum distance for the chest any point between the chest and the bottom of that piece and which diminishes gradually from the chest to the waist; and has a width which does not exceed the maximum dimension for the seat at any point between the seat and the waist and which diminishes gradually from the seat to the waist.

3.14 In the case of a two-piece garment, has an upper piece with a width which does not exceed the maximum distance for the chest at any point between the chest and the bottom of that piece which diminishes gradually from the chest to the bottom of that piece; in the case of an upper piece with fastenings, has the lowest fastening within 15 cm (6 inches) of the bottom of that piece

3.15 In the case of a two-piece garment, has a lower piece with a width which does not exceed the maximum dimension for the seat at any point between the seat and the top of the lower piece and which diminishes gradually from the seat of the top of that piece.

Diagram 1

| Distance From Shoulder (G) to (H) for Upper Arm Measurement for Sizes 9 Months Through 6X |
|---------------------------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|
| 9-12 mo                         | 12-18 mo      | 18-24 mo      | 2             | 3             | 4             | 5             | 6X            |
| 5.8 cm 2½”                      | 6.6 cm 2½”    | 7.4 cm 2½”    | 7.4 cm 2½”    | 8.1 cm 3¼”    | 8.8 cm 3½”    | 9.5 cm 3¾”    | 10.3 cm 4”    | 11 cm 4½”    |

Distance From Shoulder (G) to (H) for Upper Arm Measurement for Sizes 7 Through 14

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<td>4½”</td>
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Diagram 2

Diagram 3
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4 TIGHT-FITTING (SNUG-FITTING) SLEEPWEAR – FIT APPROVAL

4.1 It is the supplier’s responsibility to ensure that all 0-14 sizes of tight-fitting sleepwear is within the maximum measurement requirement per Table 2.

4.2 During the fit-approval process, suppliers must submit one size per size range per style to Kroger’s Technical Designer/Fit Engineer.

4.2.1 For example, on 9M-24M range of sizes, send one of the infant size; on 2T-4T range of sizes, send one of the toddler sizes, on 4-14 size range, send one of the boy/girl size.

4.3 During the pre-production garment submission, suppliers must submit one size per size range per style, across multiple colorways/print design to Kroger’s Technical Designer/Fit Engineer.

4.3.1 For example, if a style has 5 different colorways/print design (red, orange, yellow, green, blue, pink/floral print), on the 9M-24M range of sizes, send one of the infant sizes in the red colorway; on the 2T-4T range of sizes, send one of the toddler size in the yellow colorway; on the 4-14 size range, send one of the boy/girl size in the pink-floral print.

4.4 For any questions regarding fit approval, please contact Kroger’s Fit Engineer, jennifer.thoden@kroger.com.

4.5 During third-party testing for Top of Production (TOP), samples will also be measured and tested by the lab.

4.5.1 Suppliers are to send one size per size range per style across multiple colorways similar to 4.3.1.

5 TIGHT-FITTING (SNUG-FITTING) SLEEPWEAR – RECORD KEEPING REQUIREMENT

5.1 Suppliers must maintain a record of finished samples of tight-fitting garments (one for every size), trims, and fabrics in accordance with 16 CFR 1615 and 16 CFR 1616 for a minimum of 7 years.

5.1.1 As a general rule, there must be enough samples to perform necessary retest if required.

5.2 All relevant documents pertaining to the tight-fitting sleepwear sample shall also be maintained via a physical printed record and digital copies of those documents (for e-mailing purpose) for a minimum of 7 years.

5.2.1 Physical printed copies of the document shall be kept with the samples by the supplier.

5.2.2 Digital copies of the documents shall be maintained by the supplier in a secure
document file that is easily accessible if needed.

5.2.3 At a minimum, the following information shall be easily obtainable from the documents:

5.2.3.1 Style numbers
5.2.3.2 Fabric specification
5.2.3.3 Size range
5.2.3.4 Pattern and measurement for each size
5.2.3.5 Number of units produced and shipped
5.2.3.6 Dates of production and shipment
5.2.3.7 Factory and Vendor Identification
5.2.3.8 PO #
5.2.3.9 Garment yield from fabrics
5.2.3.10 City and Country of production
5.2.3.11 Care Instruction
5.2.3.12 Third-party laboratory test reports

5.3 These records and samples should be available to Kroger immediately upon request.

6 LOOSE-FITTING (FLAME RESISTANT) SLEEPWEAR - KROGER POLICY

6.1 Use of flame retardant chemicals or finishing is not allowed.

6.1.1 Suppliers are required to provide the third party testing laboratory a Letter of Guarantee stating that the sample provided (referencing GPU) does not contain flame retardant chemicals.

6.1.2 If a Letter of Guarantee is not provided, chemical analysis/screening for flame retardant chemicals shall be performed by the lab.

6.2 Loose fitting sleepwear must be made from 100% Polyester fabric.

6.3 Threads used for seam construction or trimming such as embroidery shall also be made from flame resistant threads. 100% polyester threads is the most common flame resistant material.

7 LOOSE-FITTING (FLAME RESISTANT) SLEEPWEAR – FLAMMABILITY
TESTING REQUIREMENT

7.1  Fabric Stage Testing – per 16 CFR 1615 and/or 16 CFR 1616

7.1.1  A Fabric Production Unit (FPU) can only be designated every 5000 linear yards. If a fabric production unit surpasses 5000 linear yards, a new FPU number must be designated and must be tested for flammability separately.

7.1.2  Each colorway or print pattern must also be treated as a single FPU. This means an FPU cannot be a combination of two or more colorways/print design. A new FPU number must be designated for any additional colorway/print and must be tested separately.

7.1.3  Flammability testing for FPU must follow normal sampling plan; 2 yards from the beginning and 2 yards from the end of the FPU.

7.1.4  Testing must be performed as received and after 50 washes.

7.1.5  Ensure that the fabrics being sourced will pass the flammability test. Failing FPU’s will be rejected and cannot be used for garment production of children’s loose-fitting sleepwear.

7.2  Seam and Trim Prototype – per 16 CFR 1615 and/or 16 CFR 1616

7.2.1  Each type of seam construction, that are 10 inches or longer on the garment, and trims are required to be mocked on the passing FPU and tested for flammability at pre-production.

7.2.2  Trim means any decorative materials such as ribbons, laces, embroidery, ornaments, or plastisol printed coatings. It does not include functional materials (findings) such as zippers, buttons, snaps, elastic bands, etc.

7.2.3  Testing must be performed before the production of the loose-fitting sleepwear garment begins.

7.2.4  Prototype testing needs only to be done as received.

7.3  Garment Testing – per 16 CFR 1615 and/or 16 CFR 1616

7.3.1  A Garment Production Unit (GPU) can only be designated every 500 dozen (6000) units of finished garment. If a GPU exceeds 6000 units, a new GPU number must be designated and must be tested separately for flammability.

7.3.2  Each garment colorway/print pattern must also be treated as a single GPU. This means a GPU cannot be a combination of two or more colorways/print design. A new GPU number must be designated for any additional colorway/print and must be tested separately.

7.3.3  Flammability testing needs to be done after 1 home laundering.
7.3.4 Ensure garment is passing flammability test. If the sample fails flammability test, contact michaele.logronio@kroger.com immediately for directions. Retesting is not allowed.

8 LOOSE-FITTING (FLAME RESISTANT) SLEEPWEAR – ASSIGNING FPU AND GPU NUMBERS

8.1 FPU numbers must be assigned for each colorway/print pattern and can only be assigned every 5000 linear yards of fabric.

8.1.1 When assigning FPU, use the format **FP-Style Number-XX**

8.1.2 The last two XX is for numerical and alphabetical assignment.

8.1.2.1 The first X is for numerical assignment for every 5000 yards of fabric; the first 5000 yards is 1, second 5000 yards is 2, third is 3, and so forth.

8.1.2.2 The second X is for alphabetical assignment for every colorway/print pattern; the first colorway/print is A, second colorway/print is B, third is C, and so forth.

8.1.3 Example for assigning FPU number:

8.1.3.1 For style KGF18-SL5006, the FPU number assignment for the first 5000 linear yard of fabric used for colorway/print black “stay wild” pattern is FP-KGF18-SL5006-1A.

8.1.3.2 If 8000 linear yard was used for production of the garment, the first 5000 linear yard was designated as “1”, the remaining 3000 yard will be assigned “2” so the FPU number for the second “3000” yards would be FP-KGF18-SL5006-2A.

8.1.3.2.1 Note that because the colorway/pattern remained the same, “A” was still used at the end.
8.1.3.3 For the same style with a second colorway/print of pink “dream big” that used 15000 linear yards of fabric, the FPU numbers would be:

8.1.3.3.1 FP-KGF18-SL5006-1B for the first 5000 linear yard of fabric.

8.1.3.3.2 FP-KGF18-SL5006-2B for the second 5000 linear yard of fabric.

8.1.3.3.3 FP-KGF18-SL5006-3B for the third 5000 linear yard of fabric.

8.1.3.3.4 Note that since this is the second colorway/print, the last alpha designation is “B”.

8.2 GPU numbers must be assigned for each colorway/print pattern and can only be assigned every 500 dozen (6000) units of finished garment.

8.2.1 When assigning GPU, use the format GP-Style Number-XX

8.2.2 The last two XX is for numerical and alphabetical assignment.

8.2.2.1 The first X is for numerical assignment for every 6000 units of finished garment; the first 6000 finished garment is 1, second 6000 unit is 2, third is 3, and so forth.

8.2.2.2 The second X is for alphabetical assignment for every colorway/print pattern; the first colorway/print is A, second colorway/print is B, third is C, and so forth.

8.2.3 Example for assigning GPU number:

Image 3

8.2.3.1 For style KGF18-SL5006, the GPU number assignment for the first 6000 finished garment used for colorway/print black “stay wild” pattern is GP-KGF18-SL5006-1A.
8.2.3.2 If 10,000 garment unit was produced, the first 6000 garment unit was designated as “1”, the remaining 4000 garment unit will be assigned “2” so the GPU number for the second “4000” garment unit would be GP-KGF18-SL5006-2A.

8.2.3.2.1 Note that because the colorway/pattern remained the same, “A” was still used at the end.

8.2.3.3 For the same style with a second colorway/print of pink “dream big” that has 18,000 garment units, the GPU numbers would be:

8.2.3.3.1 FP-KGF18-SL5006-1B for the first 6000 garment unit.

8.2.3.3.2 FP-KGF18-SL5006-2B for the second 6000 garment unit.

8.2.3.3.3 FP-KGF18-SL5006-3B for the third 6000 garment unit.

8.2.3.3.4 Note that since this is the second colorway/print, the last alpha designation is “B”.

9 LOOSE-FITTING (FLAME RESISTANT) SLEEPWEAR – RECORD KEEPING REQUIREMENT

9.1 Suppliers must maintain 4 linear yards for each FPU’s (2 from the beginning of the FPU, 2 from the end of the FPU – mark clearly on the fabric which ones are from the beginning and which one is from the end of the FPU), 15 mocked specimens of each trim and seam prototype, and 5 finished garments of the largest size for each GPU at a secure location in their facility. These records must be maintained for a minimum of 7 years.

9.1.1 As a general rule, there must be enough samples to perform necessary retest if required.

9.1.2 It is recommended that when suppliers are sampling for third-party test submissions, the supplier should prepare the same amount for record keeping.

9.2 Suppliers must also keep physical copies of all relevant documents pertaining to the loose-fitting sleepwear sample with the samples (samples in Section 9.1).

9.2.1 At a minimum, the following information shall be easily obtainable from the documents:

9.2.1.1 Style numbers

9.2.1.2 Fabric specification

9.2.1.3 Size range

9.2.1.4 Pattern and measurement for each size
9.2.1.5 Number of units produced and shipped

9.2.1.6 Dates of production and shipment

9.2.1.7 Factory and Vendor Identification

9.2.1.8 Kroger’s PO #

9.2.1.9 Garment yield from fabrics

9.2.1.10 City and Country of production

9.2.1.11 Care Instruction

9.2.1.12 Letter of Guarantee stating garment has no flame retardant chemicals.

9.2.1.13 Third-party laboratory test reports

9.2.1.14 Corresponding FPU number and GPU number information for each sample (and how each FPU is related to the GPU and vice versa).

9.3 Flammability tested specimens and remaining samples, including burned/charred specimens, shall be maintained at the third-party laboratory testing facility and shall be kept and maintained for a minimum of 7 years with physical copies of the test report.

9.3.1 These records shall be available upon request from the third-party laboratory.

9.3.2 Only the Kroger Compliance team can ask for these records.

9.4 Digital copies of the documents mentioned in Section 9.2 shall also be maintained by the supplier in a secure document file that is easily accessible if needed.

9.4.1 These documents must be available to Kroger Compliance team within 24 hours of request.

9.5 Physical samples and documents mentioned in 9.1 and 9.2 must be kept together and must be available to the Kroger Compliance team upon request.

9.6 At least once a year, Kroger will be auditing the factories in their facilities to ensure that the records for the children’s sleepwear are properly maintained.

10 LOOSE-FITTING (FLAME RESISTANT) SLEEPWEAR –LABELING

10.1 The text “FLAME RESISTANT” shall also be included on the center back neck or center back waist label of the garment for each loose-fitting sleepwear garment.

10.2 FPU number and GPU number shall be included on the label.
10.3 Care instruction must use the following verbiage:

10.3.1 Note if the garment is a fleece fabrication or it has raised fibers, then the ironing instruction needs to be changed from “COOL IRON IF NEEDED” to “DO NOT IRON.”

WASH BEFORE WEAR
TO RETAIN FLAME RESISTANCE
USE DETERGENT ONLY
IN RECOMMENDED AMOUNT
DO NOT USE SOAP OR
FABRIC SOFTENER
MACHINE WASH COLD
WITH LIKE COLORS
USE ONLY NON-CHLORINE
BLEACH WHEN NEEDED
TUMBLE DRY LOW
COOL IRON IF NEEDED
11 REFERENCES

11.1 Flammability Standards – These standards are available online via www.ecfr.gov

11.1.1 16 CFR 1610 – Standard for the Flammability of Clothing Textiles

11.1.2 16 CFR 1611 – Standard for the Flammability of Vinyl Plastic Film

11.1.3 16 CFR 1615 – Standard for the Flammability of Children’s Sleepwear: Sizes 0 through 6X

11.1.4 16 CFR 1616 – Standard for the Flammability of Children’s Sleepwear: Sizes 7 through 14
## Revision History

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<th>Effective Date</th>
<th>Revision Summary</th>
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<th>Approved by</th>
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<td>Megan Liu</td>
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