Flammability of Textile Products in Canada

2009
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For further information or to obtain additional copies, please contact:
Publications
Health Canada
Ottawa, Ontario K1A 0K9
Tel.: 613-954-5995
Fax: 613-941-5366
E-mail: info@hc-sc.gc.ca

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Preface

The intent of this document is to:

• provide information about the legislation in Canada that applies to textile products which may, or may likely, pose a flammability hazard

• explain how the legislation applies to general textile products, children’s sleepwear and bedding

• describe the testing methods for general textile products, children’s sleepwear and bedding

• discuss the influences of fibre content, fabric construction and design on the flammability characteristics of the finished textile products

• outline the roles and responsibilities of industry and government

To obtain information on the legislative requirements for consumer textile products not covered in this document, refer to the ‘Hazardous Products Act and Regulations’ listed in Appendix C – Canadian Information Resources, on page 27 of this document.

This document may be updated from time to time. For the most recent version, consult Reports and Publications in the Consumer Product Safety (CPS) section of Health Canada’s Web site at www.healthcanada.gc.ca/cps.
This document is an unofficial summary of the requirements for general textile products, children’s sleepwear and bedding. It is not intended to substitute for, supercede or limit the requirements under the applicable legislation. In case of any discrepancy between this summary and the legislation, the legislation will prevail. For further information, specific questions or clarification, contact a Health Canada Product Safety Office (refer to Appendix A – List of Health Canada Product Safety Offices, on page 21 of this document).
Health Canada’s Consumer Product Safety (CPS) program works closely with industry, partners and stakeholders to protect consumers and children from product-related hazards and to promote the safe use of products. CPS gets its regulatory authority from the *Hazardous Products Act* (HPA), which covers the sale, importation and advertising of a variety of products which may, or may likely, pose a danger to the user. It is the responsibility of industry to comply with the legislation. Enforcement actions taken by Product Safety Officers on noncompliant products range from negotiation with industry for the voluntary removal of these products from the market to seizure and/or prosecution under the HPA.

Certain consumer products are prohibited from sale, importation or advertising in Canada. Other products are restricted and must meet specific regulatory requirements prior to sale, importation or advertising. General textile products, certain children’s sleepwear (sleepwear for infants up to 7 kg, as well as hospital sleepwear, polo pyjamas and sleepers in sizes up to and including 14X) and bedding are prohibited if they do not meet minimum flammability requirements. Other children’s sleepwear (nightgowns, nightshirts, dressing gowns, bathrobes, housecoats, robes, pyjamas and baby-doll pyjamas in sizes up to and including 14X) have specific regulatory requirements that must be met prior to sale.
Flammability Requirements for General Textile Products

General textile products are defined, in accordance with the HPA, as all consumer products made in whole or in part of textile fibres, other than children’s sleepwear, bedding, dolls, plush toys, soft toys, cribs and cradles, playpens for children, carpets, rugs, tents, mattresses, as well as expansion gates and expandable closures for children, which must comply with different legislative requirements. General textile products include such items as fabric, drapery, outerwear and daywear.

Flammability requirements for general textile products have been in effect under item 4 of Part I of Schedule I to the HPA since 1971. These products, when tested in accordance with the Canadian General Standards Board standard CAN/CGSB 4.2 NO. 27.5-94 entitled Textile Test Methods - Flame Resistance - 45˚ Angle Test - One Second Flame Impingement, as amended from time to time, are prohibited if they have a flame spread time of one of the following:

- 3.5 seconds or less, if the product does not have a raised fibre surface; or
- 4 seconds or less, if the product has a raised fibre surface and exhibits ignition or fusion of its base fibres.
Flammability Requirements for Children’s Sleepwear

More stringent flammability requirements were established in 1971 for all children’s sleepwear in sizes up to and including 6X under item 5 of Part I of Schedule I to the HPA. In 1987, the flammability requirements for children’s sleepwear were modified by developing even more stringent requirements for loose-fitting children’s sleepwear such as nightgowns, robes, tailored pyjamas and baby-doll pyjamas in sizes up to and including 14X under item 40 of Part II of Schedule I to the HPA and the Hazardous Products (Children’s Sleepwear) Regulations. Children’s polo pyjamas and sleepers, children’s sleepwear designed for hospital use, and sleepwear designed for infants up to 7 kg remained subject to the flammability requirements under item 5 of Part I of Schedule I to the HPA. To provide school-age children with the same level of protection as preschoolers, item 5 was extended to include products in sizes up to and including 14X.
Children’s sleepwear governed under item 5 of Part I of Schedule I to the HPA, when tested in accordance with the Canadian General Standards Board standard CAN/CGSB 4.2 NO. 27.5-94 entitled *Textile Test Methods - Flame Resistance - 45° Angle Test - One Second Flame Impingement*, as amended from time to time, are prohibited if they have a flame spread time of:

- 7 seconds or less (for products with or without a raised fibre surface, and irrespective of a base burn).

Children’s sleepwear governed under item 40 of Part II of Schedule I to the HPA, when tested in accordance with the Flame Resistance Test set out in Schedule I of the *Hazardous Products (Children’s Sleepwear) Regulations*, must have:

- an average char length for five specimens that does not exceed 178 mm; and

- not more than one individual specimen with a char length equal to the full length of the specimen (254 mm).

For additional information on the HPA flammability requirements for children’s sleepwear, refer to the ‘Children’s Sleepwear: Flammability Requirement Guidelines’ listed in Appendix C – Canadian Information Resources, on page 27 of this document.
Flammability Requirements for Bedding

Bedding refers to articles that make up a bed and that are made in whole or in part of textile fibres, including sheets, pillowcases, pillows, blankets, comforters, mattress pads, bed skirts, sleeping bags and similar products used on a bed, but excluding mattresses.

Flammability requirements for bedding came into effect in 1971 under item 13 of Part I of Schedule I to the HPA. Bedding, when tested in accordance with the Canadian General Standards Board standard CAN/CGSB 4.2 NO. 27.5-94 entitled Textile Test Methods - Flame Resistance - 45° Angle Test - One Second Flame Impingement, as amended from time to time, is prohibited if it has a flame spread time of 7 seconds or less, and either:

- does not have a raised fibre surface; or

- has a raised fibre surface and exhibits ignition or fusion of its base fibres.
Textile Labelling Requirements

Consumer textile products advertised, sold or imported into Canada must also meet federal labelling requirements set out in the *Textile Labelling Act* and the *Textile Labelling and Advertising Regulations* administered and enforced by the Competition Bureau of Industry Canada. Some provincial jurisdictions may have other labelling requirements, e.g., for stuffed articles.

For more information on legislative requirements for consumer textile products, refer to Appendix C - Canadian Information Resources, on page 27 of this document.
Testing Methods

A) General Textile Products (item 4 of Part I of Schedule I to the HPA), Children’s Sleepwear (item 5 of Part I of Schedule I to the HPA) and Bedding (item 13 of Part I of Schedule I to the HPA)

In accordance with the Canadian General Standards Board standard CAN/CGSB 4.2 NO. 27.5-94 entitled Textile Test Methods - Flame Resistance - 45° Angle Test - One Second Flame Impingement, as amended from time to time, a dried piece of fabric measuring 50 mm x 165 mm (2” x 6”)
is mounted in a specimen holder at a 45 degree angle to the horizontal, and a standardized flame is applied for one second to the surface near the lower end of the fabric. The flame spread time is the time taken for any flaming to proceed a distance of 127 mm (5”) up the fabric, and is automatically recorded by the burning of a stop cord.

Before a product sample is tested for flammability, preliminary trials are conducted on fabric specimens cut from the sample in different directions to determine the direction in which to cut the test specimens and the surface to test whereby the fabric burns most rapidly. Once this has been established, the flammability of the product sample is determined by measuring the flame
spread time for five test specimens from the same sample and averaging the results.

If the flame spread time for any one specimen is equal to or less than:

- 3.5 seconds for general textile products with a flat fibre surface; or
- 4 seconds for general textile products with a raised fibre surface; or
- 7 seconds for children’s sleepwear and bedding; or
- if some specimens do not burn (i.e., do not ignite or ignite but extinguish),

five additional specimens from the sample are tested. The flame spread time of the product sample is then the average flame spread time for the ten specimens or for the number of specimens that burned.

Borderline or extremely variable flammability test results are followed up by testing at least one, and preferably two or more, additional product samples to ascertain reasonable consistency of the test results.

For detailed information on this test, refer to the Canadian General Standards Board standard CAN/CGSB 4.2 NO. 27.5-94 entitled *Textile Test Methods - Flame Resistance - 45° Angle Test - One Second Flame Impingement*, as amended from time to time, and the ‘Test Method for the Flammability of Textiles – Method F-01’ listed in Appendix C – Canadian Information Resources, on page 27 of this document.
B) Children’s Sleepwear (item 40 of Part II of Schedule I to the HPA)

In accordance with the Flame Resistance Test set out in Schedule I to the *Hazardous Products (Children’s Sleepwear) Regulations*, product samples are first washed and dried or dry cleaned according to specified procedures. Five specimens per product, each measuring 89 mm x 254 mm (3.5” x 10””) are held vertically and tested individually by applying a standardized flame for three seconds to the base and the average char length is determined.

For detailed information on this test, refer to the ‘Test Method for the Flammability of Children’s Sleepwear – Method F-17’ listed in Appendix C – Canadian Information Resources, on page 27 of this document.

Testing is the only way to confirm compliance to the applicable requirements.
Factors Affecting Textile Flammability

Fibre content, fabric construction, fabric weight and fabric finishes can all affect the flammability or rate of burn of textiles. All textiles will burn to varying degrees if exposed long enough to a flame or an intense heat source. When discussing any one factor below, it is assumed that all other pertinent factors remain constant.

A) Fibre Content

With regards to flammability, fabrics may be classified generally according to fibre content:

- **readily flammable:**
  These fibres ignite readily and burn rapidly, leaving a light ash residue (e.g., cotton, acetate, triacetate, rayon, ramie).

- **moderately flammable:**
  These fibres are more difficult to ignite. The synthetics tend to melt and drip, sometimes self-extinguishing upon removal of the ignition source (e.g., acrylic, nylon, polyester, olefin, silk).

- **relatively nonflammable:**
  In general, these fibres will not support combustion after removal of the ignition source (e.g., wool, bamboo, modacrylic, vinyon, Saran).
Blends

Fabrics made of two or more fibres (blends) display flammability characteristics that are different from those of the individual fibres, and testing is the only way to ascertain the flammability of the blend. For example, although polyester is less flammable than cotton, some cotton/polyester blends have been shown to burn rapidly and generate more heat than 100% cotton fabrics. This is due to a “scaffolding” effect, where the charred cotton in the blend acts as a support or scaffold for the polyester fibres. The melting polyester in the blend does not drip away as it may do in 100% polyester fabrics, and continues to burn.

Blended fleece fabrics such as 80% cotton/20% polyester may burn quickly like 100% cotton fleece because the brushed surface can be 100% cotton, while the base may be a blend of 50% cotton/50% polyester or 60% cotton/40% polyester. A flame can quickly pass over the raised surface of the fleece, igniting the readily flammable cotton. Once the base of the fabric is ignited, the moderately flammable polyester slows down the rate of burn to one somewhat slower than that of a pure cotton fabric of equal weight and construction.
B) Fabric Construction

For textiles, the critical factor in determining flammability ratings for varying construction techniques is the availability of oxygen. Combustion is accelerated if air can permeate a fabric easily. The more loosely woven a fabric, the more combustible it is, and the faster the flame will travel over the surface of the fabric. For example, a lightweight tightly woven polyester fabric may be difficult to ignite, whereas a lightweight loosely woven (mesh) polyester fabric may fail flammability testing.

Fabrics with a raised fibre surface require special consideration. Fleece-style fabrics, flannelettes and terry towelling are some examples of construction which allow individual fibres or yarns to be exposed readily to accidental contact with ignition sources. This, combined with the fact that air readily penetrates and circulates around these loose fibres and yarns, increases the hazard level of raised fibre surface fabrics.

The flammability hazard with raised fibre surface fabrics involves the phenomenon called “surface flash” whereby a flame can travel rapidly over the fabric surface, singeing the fibre ends. This flash, in itself, may not be dangerous unless the intensity of the flame is sufficient to ignite the base fabric. In testing, this is known as timed surface flash with base burn.
C) Fabric Weight

A lightweight fabric tends to be more flammable than a heavier weight fabric of the same fibre content and fabric construction. For example, rayon chiffon usually fails to meet the HPA flammability requirements while rayon georgette generally passes. The georgette yarns are more tightly twisted and the weave is more tightly compacted than chiffon. Consequently, the georgette fabric is more difficult to ignite, and when it does ignite, the rate of burn is slower because of the restricted availability of oxygen.

D) Fabric Finishes

A chemical or mechanical finish alters the surface of a fabric and in doing so affects the flammability of that fabric. Finishes not designed specifically to retard flammability must be considered as unknown variables that influence the total flammability of the textile product. Only through testing can the effect of the system be ascertained. For example, enzyme washes designed to reduce the pile on 100% cotton fleece tend to reduce the surface flash by shortening and compacting the loose cotton fibres.
The proper choice of fabrics and design criteria will allow children’s sleepwear to meet the applicable HPA flammability requirements without treatment with flame retardants. Flame retardants are substances used to impart improved flame resistance to a material. If flame retardants are used, they must meet strict toxicological testing set out in the *Hazardous Products (Children’s Sleepwear) Regulations*. 
Canadian Exports to the United States

General textile products and children’s sleepwear produced in Canada and shipped to the United States are subject to textile flammability standards issued and enforced by the United States Consumer Product Safety Commission (CPSC). For more information, refer to Appendix D – United States Information Resources, on page 30 of this document.

Flammability requirements for general textile products and children’s sleepwear are similar in Canada and the United States, but there are some differences such as the requirements and procedures for laundering. Canadian companies exporting to the United States are advised to ensure compliance with the United States standards and have their goods tested prior to export.

For a partial list of laboratories that provide textile testing services, refer to Appendix B – Canadian Textile Testing Laboratories, on page 25 of this document.
At the time of this publication, there were no flammability requirements for bedding in effect in the United States. However, the California Bureau of Home Furnishings and Thermal Insulation (BHFTI) was drafting Technical Bulletin 604, *Test Procedure and Apparatus for the Flame Resistance of Filled Bedclothing* and in 2005, the United States CPSC initiated rulemaking for the flammability of bedclothes by issuing an Advance Notice of Proposed Rulemaking (ANPR) for 16 CFR Part 1634, *Standard to Address Open Flame Ignition of Bedclothes*. To contact the California BHFTI or the United States CPSC for the current status of these standards, refer to Appendix D – United States Information Resources, on page 30 of this document.
Roles and Responsibilities

The roles and responsibilities of government and industry in ensuring the safety of general textile products, children’s sleepwear and bedding include, but are not limited to, the following:

A) Health Canada

• develop and enforce the legislation
• educate and inform industry and consumers
• monitor the marketplace, including following up on industry and consumer complaints, recalls by industry and the United States CPSC, and referrals from other agencies or governments
• obtain samples for testing to determine compliance with the HPA flammability requirements

For products that do not comply with the HPA flammability requirements:

• take enforcement actions depending on the risk of the products to the consumer, including:
  - providing a verbal or written warning for corrective action to be taken by industry
- negotiating with industry to voluntarily discontinue the sale of these products through removal, disposal or recall at industry’s expense

- seizing noncompliant products and/or prosecuting industry under the HPA

• notify the public of a recall on Health Canada’s Consumer Product Recalls Web site

• issue a public warning or advisory if the risk to the public is determined to be serious

• follow up with the supplier to ensure that the same noncompliant fabric was not sold to other manufacturers

• inform the United States CPSC if the noncompliant product or fabric has been shipped to the United States

**B) Mills/Finishers/Importers of Fabric (Yard Goods)**

• ensure that the fabric (yard goods) meets the basic HPA flammability requirements for general textile products

• if the fabric is intended for the manufacture of children’s sleepwear, ensure that it meets the more stringent HPA flammability requirements which are applicable to the style of children’s sleepwear they are producing

• if the fabric is intended for the manufacture of bedding,
ensure that it meets the more stringent HPA flammability requirements for these products

• advise their customers in the event that the fabric they sell meets the basic HPA flammability requirements for general textile products but not the more stringent HPA flammability requirements for children’s sleepwear or bedding

• test the fabric as necessary to ensure continued compliance with the legislation

• when aware of or notified of a noncompliant product, co-operate in any removal, disposal or recall from the marketplace

C) Manufacturers of General Textile Products, Children’s Sleepwear or Bedding

• ensure that the fabric being used meets the basic HPA flammability requirements for general textile products

• if the fabric is used to manufacture children’s sleepwear, ensure that it meets the more stringent HPA flammability requirements which are applicable to the style of children’s sleepwear they are producing

• if the fabric is used to manufacture bedding, ensure that it meets the more stringent HPA flammability requirements for these products
• request test results from their supplier or contract their own testing as deemed necessary

• when aware of or notified of a noncompliant product, co-operate in any removal, disposal or recall from the marketplace

D) Retailers/Buyers of Fabric (Yard Goods), General Textile Products, Children’s Sleepwear or Bedding

• become knowledgeable about the requirements that apply to the goods being purchased

• ensure that the products being purchased meet the applicable HPA flammability requirements

• if products are being purchased outside of Canada, ensure that they meet the applicable HPA flammability requirements prior to importation

• when notified of a removal, disposal or recall of a noncompliant product, immediately remove the affected product from sale

• do not promote children’s daywear as suitable for use as sleepwear

• segregate children’s sleepwear from daywear to assist the consumer in making safe choices for their children

Consumer safety is a shared responsibility.
APPENDIX A

List of Health Canada Product Safety Offices

British Columbia and Yukon

Suite 400 - 4595 Canada Way  
Burnaby, British Columbia  
V5G 1J9

Tel: 604-666-5003  
Fax: 604-666-5988

Bby_Prodsafe@hc-sc.gc.ca

Serves these states in the US: Alaska, California, Hawaii, Nevada, Oregon, Washington

Alberta and Northwest Territories

Canada Place, Suite 730  
9700 Jasper Avenue  
Edmonton, Alberta  
T5J 4C3

Tel: 780-495-2626  
Fax: 780-495-2624

Alberta_Prodsafe@hc-sc.gc.ca

Harry Hays Building, Room 282  
220 - 4th Avenue South East  
Calgary, Alberta  
T2G 4X3

Tel: 403-292-4677  
Fax: 403-292-4644

Alberta_Prodsafe@hc-sc.gc.ca

Serves these states in the US: Arizona, Colorado, Idaho, Montana, New Mexico, Utah, Wyoming
Manitoba and Saskatchewan

510 Lagimodiere Boulevard
Winnipeg, Manitoba
R2J 3Y1
Tel: 204-983-5490
Fax: 204-984-0461
Mb_Prodsafe@hc-sc.gc.ca

Room 412, Federal Building
101 - 22nd Street East
Saskatoon, Saskatchewan
S7K 0E1
Tel: 306-975-4502
Fax: 306-975-6040
Sk_Prodsafe@hc-sc.gc.ca

Serves these states in the US: Arkansas, Iowa, Kansas, Louisiana, Minnesota, Missouri, Nebraska, North Dakota, Oklahoma, South Dakota, Texas, Wisconsin

Ontario and Nunavut

2301 Midland Avenue
Toronto, Ontario
M1P 4R7
Tel: 416-973-4705
Fax: 416-973-1746
Tor_Prodsafe@hc-sc.gc.ca

55 Bay Street North
Room 909
Hamilton, Ontario
L8R 3P7
Tel: 905-572-2845
Fax: 905-572-4581
Tor_Prodsafe@hc-sc.gc.ca

Serves these states in the US: Illinois, Indiana, Michigan, New York, North Carolina
Quebec

1001 St-Laurent Street West
Longueuil, Quebec
J4K 1C7

Tel: 450-646-1353
Fax: 450-928-4066
Quebec_Prod@hc-sc.gc.ca

901 Cap-Diamant, Suite 266-1
Quebec City, Quebec
G1K 4K1

Tel: 418-648-4327
Fax: 418-649-6536
Quebec_Prod@hc-sc.gc.ca

Serves these states in the US: Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, Ohio, Pennsylvania, Rhode Island, Vermont

Atlantic

1505 Barrington Street, Suite 1625
Halifax, Nova Scotia
B3J 3Y6

Tel: 902-426-8300
Fax: 902-426-6676
Atlantic_ProdSafe@hc-sc.gc.ca

10 Highfield Street, 1st Floor
Moncton, New Brunswick
E1C 9V5

Tel: 506-851-6638
Fax: 506-851-3197
Atlantic_ProdSafe@hc-sc.gc.ca

John Cabot Building, 3rd Floor
10 Barters Hill
St. John’s, Newfoundland
A1C 6M1

Tel: 709-772-4050
Fax: 709-772-5945
Atlantic_ProdSafe@hc-sc.gc.ca

Serves these states/district in the US: Alabama, Delaware, District of Columbia, Florida, Georgia, Kentucky, Maryland, Mississippi, South Carolina, Tennessee, Virginia, West Virginia
APPENDIX B

Canadian Textile Testing Laboratories

NOTICE: This listing of laboratories implies no certification or endorsement by Health Canada, nor is it necessarily a complete listing of all laboratories in Canada that provide textile testing services.

Alberta

Textile Analysis Service
Department of Human Ecology
Room B33, Human Ecology Building
University of Alberta
Edmonton, Alberta
T6G 2N1

Tel: 780-492-7677
Fax: 780-492-4111

Ontario

Bodycote Materials Testing Canada Inc.
Textile Department
2395 Speakman Drive
Mississauga, Ontario
L5K 1B3

Tel: 905-822-4111
Fax: 905-823-1446
APPENDIX C

Canadian Information Resources

NOTICE: For further information on textile products, contact a Health Canada Product Safety Office (refer to Appendix A – List of Health Canada Product Safety Offices, on page 21 of this document) or visit the following:

• Consumer Product Safety (CPS)
  www.healthcanada.gc.ca/cps

• Hazardous Products Act and Regulations

  – applicable to items 4, 5 and 13 of Part I of Schedule I to the *Hazardous Products Act*

  – applicable to item 40 of Part II of Schedule I to the *Hazardous Products Act* and the *Hazardous Products (Children’s Sleepwear) Regulations*


• Canadian General Standards Board (CGSB), CAN/CGSB 4.2 NO. 27.5-94, Textile Test Methods - Flame Resistance - 45° Angle Test - One Second Flame Impingement.
  – a copy of the most current version of this standard is available from CGSB at:

  [Link](http://www.pwgsc.gc.ca/cgsb/pubs/catalogue/order-e.html)

• Health Canada’s Consumer Product Recalls

  [Link](http://www.healthcanada.gc.ca/cps-recalls)


  [Link](http://www.competitionbureau.gc.ca/epic/site/cb-bc.nsf/en/h_00148e.html#textile)
• Ontario, Technical Standards and Safety Authority, Upholstered and Stuffed Articles Program. 
  www.tssa.org/regulated/upholstered/default.asp

• Manitoba, Consumer and Corporate Affairs, Bedding, Upholstered and Stuffed Articles Regulation. 
  www.gov.mb.ca/finance/cca/consumb/statutes.html

• Quebec, Economic Development, Innovation and Export Trade Department, An Act Respecting Stuffing and Upholstered and Stuffed Articles 
  www.mdeie.gouv.qc.ca/index.php?id=3646
APPENDIX D

United States Information Resources

• Consumer Product Safety Commission (CPSC)
  www.cpsc.gov

• Title 16 CFR parts 1602 to 1616, Standards for the flammability of clothing textiles, vinyl plastic film and children’s sleepwear
  www.access.gpo.gov/nara/cfr/waisidx_04/16cfrv2_04.html

• Title 16 CFR part 1634, Standard for the flammability of bedclothes (Advance Notice of Proposed Rulemaking (ANPR))
  www.cpsc.gov/businfo/frnotices/fr05/cpscfr05.html

• California Bureau of Home Furnishings and Thermal Insulation (BHFTI)
  www.bhfti.ca.gov

• BHFTI Technical Bulletin 604: Test Procedure and Apparatus for the Flame Resistance of Filled Bedclothing
  www.bhfti.ca.gov/industry/tb604.shtml