

INDITEX

Safe to Wear for
children's footwear

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Index - Table of contents

I. Definition of Safe to Wear for children's footwear	3
II. Mechanical Safety	5
II. 1 Cords, Laces, Drawstrings, Straps and Loops	6
II. 2 Components, Materials and Construction	7
III. EU Regulation of mandatory compliance	8
Annex I: Specific country requirements	10
Annex II: Commitment to comply with Inditex Group's Safe to Wear product safety standard	12

I. Definition of Safe to Wear for children's footwear

I. Definition of Safe to Wear for children's footwear

Safe to Wear for children's footwear is defined as a product safety standard that:

- Has been developed by Inditex in conformity with the most stringent legislation on product safety.
- Regulates product features which if present in product could present hazards for safety such as entrapment, strangulation, tripping, choking, cuts and puncture wounds.
- Lastly, includes the General Product Safety Regulation (hereinafter, GPSR) as the EU regulation of mandatory compliance for all Inditex suppliers.

Safe to Wear for children's footwear (hereinafter, STWcf) is of general and mandatory application for all children's footwear supplied to Inditex.

The responsibility of the manufacturers and/or suppliers guaranteeing compliance with the products supplied to Inditex with STWcf does not exempt them from complying with any other law or act that applies to these articles, even if it is not specifically included in this Standard. For more information about the commitment to comply with this standard see Annex II.

The exclusion of other articles does not exclude compliance with any applicable law or regulation and/or certain specific standards of Inditex group for such articles. For more information and for the resolution of doubts, refer to the buyer of the article and/or to the Sustainability Department of Inditex through stw_footwear@inditex.com.

The supplier is responsible for the compliance of the products supplied to Inditex with STWcf.

Apart from supplier mandatory obligation to control product's parameter compliance with STWcf and regardless of the commitment accepted by the supplier to control the parameters regulated in STWcf, Inditex will assess that compliance at any phase of the manufacturing process, by carrying out "Routine" and "Random Sample" analysis on determined "Model/Quality" at any point of their "Production Cycle".

II. Mechanical Safety

II. 1 Cords, Laces, Drawstrings, Straps and Loops

Certain features of the design of children's footwear to effect closure, to secure the footwear to the foot or provide a grippable element, may present an entrapment, tripping or similar hazards. Such features include shoelaces, drawstrings, ties, adjusting tabs, loops, straps and thongs, grip tabs and decorative cords. These features may also be present for decorative purposes only.

These features may be found in footwear intended to be worn by children from birth up to 7 years of age. Therefore, all children's footwear should be risk assessed and specific limitations on size, length and position on certain footwear applied to mitigate the risk.

The hazards presented by particular features or failures are also influenced by the behaviour of the wearers which in turn is mainly governed by their age. A feature that presents no hazard to an adult may be a significant hazard for a young child as they obviously behave differently. Specifications are therefore related to wearer's age and are applied according to the age of the wearer for which the footwear is intended.

Cords, drawstrings and loops may be found also on shoe bags sold together with the footwear and present a strangulation hazard for children if mis-used.

Inditex global requirements

SCOPE	REQUIREMENTS	TEST METHOD
Children's footwear (from birth up to 7 years)	UNE 59300	Visual inspection and measurement control

II. 2 Components, Materials and Construction

Features and components of footwear may present a hazard of choking, aspiration or ingestion, cuts, abrasion, etc. Such features include small parts, security of attachment of components (buttons, press fasteners, rivets, hooks, zipper pullers, eyelets, buckles, clasps, rings, etc.), sharp edges and sharp points. It is therefore essential that all such components on footwear, especially for babies (from birth up to 36 months of age) are sufficiently secure and that they remain so throughout the reasonably foreseeable period of use of footwear.

Foreign objects, that is, items that should not be present in the footwear - such as needles, pins, staples, loose components, etc. - may also present the same hazards. These can be present as a result of poor control during manufacturing process or contamination.

A removable part is any component or accessory which is intended to be capable of being separated from the footwear. A small part is defined as any component or pieces of components which can fit entirely into the standard small part cylinder - which addresses objects small enough to be able to enter the child's lower throat- without compressing and in any orientation. Many of the components attached to footwear will of themselves be small parts if they were to be separated from the footwear.

Small parts present hazards associated with choking, aspiration, ingestion (swallowing) etc., and insertion into eyes, nose or ears. The consequences of these hazards are generally serious for babies (from birth up to 36 months). For this reason, small parts are regulated in a wide range of products for this age group. Certain aspects, such sharp points or edges are also of concern for footwear intended to be worn by children up to 14 years of age. Requirements vary according to the age of the wearer.

Consideration of these hazards may also be applied to adult footwear, but the strict requirements are not directly applied as adults are able to recognize the risk or are less likely to be harmed.

Inditex global requirements

PARAMETER	SCOPE	REQUIREMENTS	TEST METHOD
Small parts	Babies (from birth up to 36 months)	Buttons/rivets/clasps/buckles/hooks/eyelets/rings/press fasteners Removal force > 70 N	UNE 59300 16 CFR 1500.51 & 52 (f)
		Other grippable components (i.e. zipper pullers, ornaments)	
		Rotating components rigidly mounted (i.e. zipper pullers) 0,45 Nm	16 CFR 1500.51 & 52 (e)
Sharp points	Babies (from birth up to 36 months)	Accessible points or edges (as received and after small parts test)	Maximum penetration under test = 0,5 mm 16 CFR 1500.48 UNE 59300
	Children (from 36 months up to 14 years)	Accessible points or edges (as received)	
Sharp edges	Babies (from birth up to 36 months)	Accessible points or edges (as received and after small parts test)	Maximum cut length < 13 mm 16 CFR 1500.49 UNE 59300
	Children (from 36 months up to 14 years)	Accessible points or edges (as received) Maximum length of cut, 50%.	
Foreign objects and nail points	All children (from birth up to 14 years)	Foreign objects that should not be present such as needles, broken needles, pins, staples, loose components, etc. None to be present	Visual inspection

For specific country requirements, please see [Annex I](#).

III. EU Regulation of mandatory compliance

III. General Product Safety Regulation

What is it?

Regulation (EU) 2023/988 of the European parliament and of the council of 10 May 2023 on general product safety. The General Product Safety Regulation, hereinafter GPSR.

Is it of mandatory compliance?

The GPSR is mandatory for all suppliers that manufacture, distribute and/or supply products imported or commercialized into European Union member States, and requires economic operators (manufacturer, importer, distributor, etc.) to place or make available only safe products on the market.

A safe product means any product which, under normal or reasonably foreseeable conditions of use, does not present any risk or only the minimum risks compatible with the product's use for the lifetime of the product.

The GPSR does not replace product specific regulations, it is complementary to other EU specific safety legislation covering any additional aspects and risks not addressed by the requirements of that specific legislation.

Specific safety requirements or "acceptable risk" are not defined within this Regulation. It is the responsibility of the economic operators to place or make available only safe products in the market. According to the GPSR, manufacturers shall ensure that those products placed on the market have been designed and manufactured in compliance with the general safety requirement laid down in the GPSR.

A product is presumed to be in conformity with the general safety requirement if it is in compliance with the relevant European standards or national legislation or requirements. Where no specific European and national legislation or standards exist, product safety shall be assured by Risk Assessment taking into account voluntary national standards, international agreements, Commission recommendations or guidelines, or product safety codes of good practice when available.

The GPSR also obliges manufacturers to carry out an internal risk analysis and draw up technical documentation before placing their products on the market, containing at least a general description of the product and its essential characteristics relevant for assessing its safety.

The GPSR places a requirement on economic operators that, when they consider or have a reason to believe that a product available in the market is a dangerous product or not in compliance with the general safety requirement, they shall immediately take the corrective measures to bring the product into conformity, inform consumers thereof and inform, through the Safety Business Gateway, the market surveillance authorities of the Member State in which the product has been made available on the market thereof.

Therefore, all Inditex Suppliers are required to inform Inditex Sustainability Department immediately if for any reason they become aware that a product supplied by them may be unsafe. Suppliers are also required to co-operate with Inditex in the provision of all necessary information in the event of a safety concern arising from any of the products they supply.

Annex I: Specific country requirements

PARAMETER	SCOPE		REQUIREMENTS	TEST METHOD	COUNTRY EXCEPTIONS
Sharp points	Children (from 36 months up to 96 months)	Accessible points or edges (after small parts test)	Maximum penetration under test = 0,5 mm	16 CFR 1500.48	USA - 16 CFR 1500.53 (e),(f)
Sharp edges			Maximum cut length < 13 mm	16 CFR 1500.49	
Heel Height	All children (from birth up to 14 years)	Any footwear designed with heel	The effective heel height should not be greater than 25 mm	Visual inspection and measurement control	CHINA - GB 30585

Annex II: Commitment to comply with Inditex Group's Safe to Wear product safety standard

Annex II: Commitment to comply with Inditex Group's Safe to Wear for children's footwear product safety standard

I hereby confirm that:

- 1) We have received the Safe to Wear for children's footwear (hereinafter, STWcf) product safety standard, we have read it and thoroughly understand its implications.
- 2) We acknowledge that compliance with STWcf is a contractual obligation and undertake, accordingly, to meet the STWcf requirements in all orders involving production, marketing or distribution placed by any of the formats of the Inditex Group.
- 3) We undertake to disclose and formally demand STWcf implications to the whole production line.
- 4) The Inditex Group:
 - Reserves the right to check: i) compliance with STWcf regarding any goods supplied, by any method, at any time, and/or at any stage of the production, marketing or distribution processes, and ii) the appropriate disclosure of STWcf.
 - Reserves the right to cancel any order for any goods where a non-compliance with STWcf regarding any test and/or inspection has been established.
 - Reserves the right to return any orders already delivered where a non-compliance with STWcf regarding any test and/or inspection has been established.
 - Reserves the right to adopt any measure deemed to be necessary in relation with the goods subject to the cancelled order, subject to the fact that the cancellation of the relevant order shall entail the non existence of the obligation to pay any sum whatsoever for the goods failing to comply with STWcf.
 - Holds the supplier as solely responsible for any and all damages caused by goods failing to comply with STWcf.
- 5) We acknowledge that approval of a "sample" and any subsequent "repetition" of goods by the INDITEX Group do not release us from our liability, for the entire production, marketing and distribution processes.

THE SUPPLIER IS RESPONSIBLE FOR ALWAYS REFERRING TO THE LATEST UPDATED VERSION OF THIS DOCUMENT, AVAILABLE AT www.inditex.com.

INDITEX

Product Sustainability

www.inditex.com

Av. de la Diputación s/n, 15143 Arteixo. A Coruña, España