



CPSC



# Crib Roundtable

## Consumer Product Safety Improvement Act of 2008

This presentation reflects the views of the presenter and is presented for Discussion Purposes Only

# New Children's Product Regulations

- The CPSIA, enacted **August 14, 2008**, established many new safety requirements for children's Products.
- While the major requirements addressing Lead content and Phthalate limits in defined children's products have been much discussed, provisions requiring CPSC to assess effective ASTM Juvenile Products Standards have received less attention.
- Section 104 of CPSIA requires revision to mandatory crib regulations

# Testing & Certification

- The new law established a schedule for certification of nearly all products regulated by CPSC. Children's products generally must be certified based on testing by an accredited lab
- The Commission on January 30, 2009 **stayed enforcement of most testing and certification requirements until February 10, 2010.**
- Lead paint compliance to 16 CFR 1303 (for products manufactured after 12-21-08), crib compliance to 16 CFR 1508, 1509 (manufactured after 1-30-09) and small parts compliance to 16 CFR 1501 (for products intended for children under 36 months (manufactured after 2-15-09) is still require. **Certification is not stayed.**
- The stay does not postpone compliance with any ban or standard.

# Tracking Labels

- Most children's products that are **manufactured after August 14, 2009** will have to bear permanent, distinguishing marks on the product and the packaging, to the extent practicable, that will permit the ultimate purchaser to determine the manufacturer, date and place of production. **Current crib standards already provide for such marking.**
- CPSC is seeking comments on specific issues, including benefits of harmonization of tracking labels with other nations. JPMA will file comments by **April 27, 2009**

# JP REGISTRATION & STDS

- Mandated adoption of substantive safety requirements from certain Juvenile Product ASTM standard provisions as mandatory law (cribs, walkers and bath seats, etc.);
- Makes mandatory product registration for 11 types of Durable Infant products (2 every 6 months).

# ASTM Crib Standards

- ASTM F-1169 and ASTM F-406 addresses dynamic performance requirements for cribs in a more extensive manner than 16 CFR 1508 and 1509.
- CPSC data has established that **such standards have reduced crib related deaths by a “remarkable 89%.”** As cited by CPSC in their **report to Congress.**
- Cribs remain the safest place to leave an unattended infant to sleep.
- Fatality Rates for infants left to sleep outside of cribs are many times higher.

# Factors to Be Considered in Rulemaking

- CPSC data demonstrates that missing hardware, damaged or misassembled cribs present the greatest hazards to unattended infants in cribs.
- Secondhand or Multiuse after disassembly are disproportionately involved in incidents.
- CPSC comparative data should be considered as part of any risk assessment needed to be performed as part of revisions to regulations.

# CPSC Mandatory Crib Stds.

16 CFR 1508 originally enacted in 1973 provides:

1. Interior horizontal dimensions.
2. Interior vertical dimensions from mattress support.
3. Horizontal spacing between slats.
4. Horizontal spacing between slats under defined static load.
5. Vertical ledge or toehold restrictions.

# 16 CFR 1508

## 6. Requirement for understandable assembly instructions that include:

- a. Cautionary statement regarding secure tightening of bolts and other fasteners.
- b. Cautionary statement directing child to be removed at height of 35".
- c. Warning relative to proper mattress size.

## 7. Requirement for certain warnings and identification:

- a. Name and address of manufacturer on crib & carton.
- b. Model number on crib & carton.
- c. Mattress size requirements on crib & carton.

# 16 CFR 1508

8. Production lot records maintained for 3 years including record of sales.
  9. Requirement to eliminate certain cutouts that may cause head entrapment (head form probe).
- **Notwithstanding such requirements CPSC has long relied upon the more comprehensive ASTM crib standards**

# ASTM F 1169

- The ASTM standard on full-size cribs (ASTM F 1169) was first published in 1988 and the current version was published in 2007. This standard refers to 16 CFR 1508 and includes several additional requirements, including:
  1. Surface coating must comply with 16 CFR 1303
  2. Must comply with 16 CFR 1501 (small parts) before and after testing.
  3. Elimination of corner post vertical projections.

# ASTM F 1169

4. Mattress Support Vertical Impact Test to simulate abuse of the support system and crib joints in general – consists of dropping a 45-pound weight of defined geometry from a height of 6 inches above a “mattress” at defined locations and cycle rates for a total of 700 impacts.
5. Crib Side Impact Test consists of repeatedly dropping a 30-pound weight 3 inches at the center of the side bottom rail at a defined cycle rate for 250 impacts.

# ASTM F 1169

6. Crib Side Static Test follows the Crib Side Impact Test and consists of applying and maintaining for 30 seconds a 100-pound weight at the point of impact of the test above.
7. Mattress Support System Attachment Test consists of the application of a 25-pound vertically upward force at each unique attachment corner with no mattress in the crib – simulating a sibling or large dog playing under the crib.
8. Crib Slat Torque Test consists of the application of a 30 lbf-in. torque at the midpoint in height of each spindle or slat.

# ASTM F 1169

9. Crib Drop Side Latch Test applies a 60-pound vertically downward force in conjunction with a 30-pound horizontal force parallel to the side at defined locations and alternating from one end of the side to the other.
10. Crib Folding Side Latch Test is similar to test # 9 above except the 60-pound downward force is replaced by a 30-pound horizontally outward force.
11. Plastic Teething Rail Test to determine the security of the attachment consists of the application of a 50-pound vertically downward force while measuring deformation.

# ASTM F 1169

## 12. Requirements for labeling and warnings on crib:

- a. Suffocation warning for soft bedding, pillows, etc.
- b. Failure to follow instruction and warnings could result in death.
- c. To reduce risk of SIDS infants should be placed on their backs to sleep.
- d. Strings can cause strangulation – hood strings, pacifier cords, toys, etc.

# ASTM F 1169

- e. Be sure all fasteners are tight to help prevent parts of body or clothing becoming trapped and causing strangulation.
- f. Do not place crib near window where cords from blinds or drapes may strangle.
- g. When child is able to pull to standing position, set mattress to lowest position.
- h. After raising side, make sure latches are secure
- i. Do not leave child in crib with side lowered.
- j. When child is able to climb out or reaches height of 35 inches, remove from crib.

# ASTM F 1169

- k. Check for damaged or loose joints, hardware, etc.
- l. Do not use crib if parts are missing or damaged.
- m. Do not substitute parts.
- n. Cribs not intended to hold water mattress must so state.
- o. Statement to replace cracked or loose teething rails.
- p. If refinishing, use a non-toxic finish specified for children's products.

# ASTM F 1169

13. Instructions shall include information on assembly, maintenance, cleaning and storage and use.
14. A means shall be provided to keep the instructions with the crib.
15. Instructions shall contain all warnings required on the crib itself (#12 above) plus:
  - a. Directions for reading and storing instruction for future use.
  - b. Never use plastic bags or plastic film for mattress cover.
  - c. Warning that infants can suffocate in gaps between crib sides and a small mattress.

# New Work To Be Assessed

**Work-in-progress on ASTM F1169 includes (complete or nearly so):**

Design requirements for the attachment/pinning of slats/spindles to top and bottom rails.

Slat/spindle strength performance /defect testing.

Drop Side elimination potential requirement.

# TIMETABLE



▽↑○ (101) Lead Paint

↑● (102) Third Party Certification

▽ General Conformity Assessment

▽ (103) Tracking Labels

↑● (104) Durable Products Registration

▽↑ (105) Labeling/Advertising

▽↑● (106) Mandatory Toy Standard

▽↑ (108) Phthalates

↑ (214) Recall Notices

↑ (217) Civil Penalty Factors

↑ (222) Imported Products Risk Assessment

○ (223) Substantial Product Hazard

▽● (232) ATVs

