

**U.S. Consumer Product Safety Commission  
LOG OF MEETING**

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7/14/04  
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**SUBJECT: Subcommittee Meeting Minutes for ASTM F15.06 Non-Powder Gun Products**

**DATE OF MEETING: June 22, 2004**

**LOG ENTRY SOURCE: Susan Bathalon** *[Handwritten initials]*

**DATE OF LOG ENTRY: July 12, 2004**

**LOCATION: ASTM Headquarters, West Conshohoken, Pa**

**CPSC ATTENDEE(S): Mark Kumagai, Sharon White and Susan Bathalon**

**NON-CPSC ATTENDEE(S):**

Sanford Abrams  
Dave Baskin  
Dr. Robert Beeman  
Josh Brownstein  
Chris Conte  
Juan Carlos Casas  
William Croce  
Danny Diaz  
Diane Edbril  
Jess Galan  
Steven Glazer  
Athena Jamesson  
David Kochman  
Robert Little  
Aaron Locker  
Marianne McBeth

Maryland Licensed Firearms Dealers Association  
National Wheelchair Shooting Federation  
Airgun Information International  
Consumer Federation of America  
National Rifle Association of America  
GAMO USA Corp.  
American-Dot-Shooters-Assoc.  
Remington Arms Co. Inc.  
Cease Fire Pa  
Miami-Dade P.D.  
Consumer  
Crosman Corporation  
Harris Beach LLP  
University of Michigan – Dearborn  
Locker, Greenberg & Brainin, PC  
Daisy Outdoor Products

Kathie Morgan  
Joe Murfin  
Richard J. Napoli  
Susan Peschin  
John Preston  
Robert Ruxin  
Edward Schultz  
Zack Snow  
John Steele  
Michael R. Stephens  
John J. Thompson  
Joshua Ungier  
Rolf Wilken

ASTM International  
Daisy Outdoor Products  
World Long Range Historical Rifle Association  
Consumer Federation of America  
John Preston Consulting  
S/R Industries, Inc.  
Crosman Corp  
National Shooting Sports Foundation  
Cybergun USA LLC  
Daisy Outdoor Products  
Delaware State Sportsman's Association  
Pyramyd Air  
GAMO USA Corp

**SUMMARY OF MEETING:** CPSC representatives were called on to address the first two agenda items, which were written, verbatim, from the Daisy Provisional Acceptance of Settlement published in the Federal Register, December 10, 2003. These two agenda items were:

- The possibility of uniform industry standards for loading and feeding of BB's in all multi-shot air guns to insure that an air gun, when operated in accordance with the manufacturer's operating instructions, will load, feed or fire properly.
- What is the appropriate age for intended users of air guns that fire projectiles at more than 350 feet per second? (Present standard is 16 years of age.)

CPSC staff explained that as stated in the Settlement agreement, these two agenda items are presented for consideration and review by the subcommittee, Task groups were formed for the two agenda item, multi-shot air guns feeding and loading and age of intended users for air guns greater than 350 feet per second.

CPSC staff distributed a comprehensive listing of In-Depth-Investigations injury data from January 1990 – June 2004 to all subcommittee members for review. CPSC staff asked for assistance by the SC to review and categorize the incidents. A Task Group was formed to review and categorize the nearly 200 incident reports.

The SC chair asked for general discussion on other standard issues in the context of the review process for both the F589-00 and F590-00 standards. The

first issue was the industry performance standard for loading and feeding of BB's in all multi-shot air guns. The SC chair stated that the standard has labeling in multi-shot BB's that conveys 'in manufacturer's recommended position', which may not be representative of field use. She also stated that second hand air guns would not be provided with instructions, This area was considered to be a portion of the already formed task group. As such, the issue will be discussed in the multi-shot air guns feeding and loading task groups.

The next issue was specifications for a bb load indicator requirement. The group discussed that this issue has been brought to the SC in the past. Several members expressed their opinion that a load indicator device would train the user to rely on a mechanical device rather than properly treating the gun as 'always loaded.' This reliance on a mechanical device could prove faulty and warrant more injuries. Aaron Locker asked CPSC to provide information on this subject, as this issue was explored within CPSC.

Automatic safeties that would engage when the air gun is loaded and ready for firing was discussed. Members against such a device argued that people have been known to disengage safety devices, and that users would rely on the mechanical device rather than treating the gun as if it were always loaded. It was stated that teaching these habits could result in more injuries for firearm handlers. There was general discussion that incorporating safety devices have historically met with resistance, though these safety features becomes inherent with use of the product. The example provided was airbags. No task group was formed at this time, but will be considered after the incident data review is completed.

Velocity levels related to ages and uniform standards for velocity limits were discussed. The 350 feet per second velocity was explained to be a 'watershed' number based on past injury data. This velocity is generally considered the speed that can penetrate tissue. The question was raised if a gun could be considered too powerful. The standard does not specify upper limits in velocity, which several manufactures support. The rationale for their support was the there should be no safe distances with respect to a gun's power. It was stated that BB guns are not classified as toys. These issues will be further discussed in the age of intended user task group.

Lastly, the labels and warning sections will readdressed for language that would adequately warn consumers of children under 16 using non-powder guns, warnings of the dangers of death, and the potential hazards of air guns appearing unloaded when they may contain a BB or pellet. These issues will be tackled in a warning and labels task group.

**Resulting task groups:**

1. Data categorization and grouping of similar scenarios
2. Loading and feeding BBs in multi-shot air guns. This area includes load

indicators and performance requirements that test in a 'manufacturer's use position, where consumer use may not be restricted to these positions.

3. Appropriate age of users with high power guns
4. Labeling and warnings