



MEETING LOG

SUBJECT: ASTM F15 Ad Hoc Language Task Group

FY 25 OP PLAN ENTRY: Warning Signs and Labels

DATE OF MEETING: 1/30/2025

LOCATION OF MEETING: Virtual

CPSC STAFF FILING MEETING LOG: Tim Smith (ESHF)

FILING DATE: 2/3/2025

CPSC ATTENDEE(S): Tim Smith (ESHF), Zachary Foster (ESHF), Stephen Harsanyi (ESHF), Kristen Talcott (ESHF), Daniel Taxier (ESMC), and Suad Wanna-Nakamura (HSPP)

NON-CPSC ATTENDEE(S): Contact ASTM for the full attendee list

Summary of Meeting:

This meeting of the ASTM Ad Hoc Language task group (TG) was led by the TG lead, Brenda Hogan. The TG discussed several possible updates and revisions to the Ad Hoc TG's recommended language document. Most of the discussion, outlined below, pertained to the recommended suffocation warning for infant sleep products:

- *Introductory Language.* There was general agreement to changing the language introducing the warning, which describes the warning as being for infant sleep products and provides multiple examples of such products, so that "cribs" is changed to "crib mattresses," "inclined infant sleep products" is deleted, and language is added to state explicitly that the examples are not exhaustive.
- *Format.* The TG discussed the warning format, which some ASTM members thought was inconsistent with the recommended warning format requirements because bullets do not precede the precautionary statements but *are* included within the hazard description. The TG considered various alternatives, including removing the existing bullets and adding bullets to the precautionary statements, putting bullets in front of all these elements of the warning, and leaving the warning formatted as-is. The TG concluded that bullets could remain in front of the hazard elements, for readability purposes, but that other bullets, visually distinct from the ones used in the hazard statement, should be included in front of the precautionary statements to be consistent with the formatting requirements specified in the recommendations document.
- *Warning Language.* The TG concluded that the warning's reference to infants having suffocated on "comforters" should be changed to the broader term of "blankets." CPSC staff also raised the possibility of reducing the amount of text in the warning by removing or merging potentially redundant language and removing standalone hazard identifiers (e.g., "SUFFOCATION HAZARD") when the hazard is



otherwise already identified in the warning text.

The TG also discussed the possibility of adding a statement to the recommendations document about individual subcommittees being allowed to consider reduced warning language content if a pictogram is used that communicates the same message, consistent with the recommendations of the ANSI Z535.4 standard. CPSC staff pointed out that the ANSI Z535 series of standards recommends the use of pictograms without accompanying text *only* if the pictogram has passed comprehension testing, as described in ANSI Z535.3; thus, any statement about the use of pictograms to reduce language should include such a statement. The TG concluded that the best approach would be to include a brief statement referring the reader to the ANSI Z535.3 standard if a pictogram is used.

Lastly, the TG discussed standard language for a general requirement to make sure that products that can be converted to a product covered by another standard, or that have functions that are addressed by other product standards, would be required to meet the requirements for the applicable standard when in that use mode. The TG lead presented multiple alternatives for such a requirement, pulled from individual ASTM standards. The TG agreed that all alternatives were very similar, and the TG lead agreed to prepare a generic version for the TG's consideration.

Next Steps:

The TG lead intends to mark up the latest revision (H) of the Ad Hoc Language TG's recommended language document and share it with the TG. The TG lead also will send out a poll to schedule a follow-up TG meeting to continue the discussion.