



MEETING LOG

SUBJECT: ASTM F15 Ad Hoc Language Task Group

FY 25 OP PLAN ENTRY: Warning Signs and Labels

DATE OF MEETING: 4/29/2025

LOCATION OF MEETING: Virtual and In-Person at ASTM Headquarters (West Conshohocken, PA)

CPSC STAFF FILING MEETING LOG: Tim Smith (ESHF)

FILING DATE: 5/5/2025

CPSC ATTENDEE(S): In-Person: Jacqueline Campbell (EXHR) and Daniel Taxier (ESMC); Virtual: Tim Smith (ESHF), Rana Balci-Sinha (ESHF), Stephen Harsanyi (ESHF), Ashley Johnson (HSPP), Kristen Talcott (ESHF), Carlos Torres (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 chair of the TG, Brenda Hogan. The chair presented, and attendees discussed, a draft ballot to revise the TG's Ad Hoc Language recommendations document. The proposed revisions largely reflected prior discussions of the TG and included the following:

- *General Requirement Language for Products with Multiple Functions.* The draft ballot included proposed language for a requirement that products that can be converted into other products, or have other use modes, for which other product safety standards apply must comply with the requirements of each applicable standard. Attendees discussed whether the addition of such a requirement in a standard would mean that a convertible product that otherwise meets a particular standard would technically fail that standard if it does not meet *another* standard that applies when the product is converted. There was substantial debate on this topic, but the chair noted that this requirement is already in multiple standards and the intent of adding it to the Ad Hoc Language recommendations was just to develop standardized language. Attendees discussed minor editorial changes to the language for clarity, and the chair intends to revise the language accordingly.
- *Warning Label Permanency Test Methods.* The draft ballot included revisions to the label permanency test method language to clarify that no portion of a non-paper label that is removed during testing, whether the entire label or part of the label, can fit fully within the small parts cylinder. Attendees discussed minor editorial changes to the language for clarity, and the chair intends to revise the language accordingly.
- *Type Size Conversion and Reference.* The draft ballot included revisions to the current Marking and



Labeling warning text size requirements to show the metric conversion of 0.2 inches as 5.1 mm, rather than 5 mm, to prevent manufacturers who rely on the metric conversion from using text that is too small. Attendees discussed whether the text size requirements that are currently presented as 0.2 and 0.1 inches should be changed to 0.20 and 0.10 inches, respectively, so the English and metric units are using the same number of significant digits.

- *Suffocation-Related Warning Statements.* The draft ballot included revisions to the language related to the recommended suffocation warning for infant sleep products. These revisions include removing “infant inclined sleep products” from the introductory language describing the products for which the warning might apply, changing “comforters” to “blankets,” and reformatting the warning to add bullet points before each precautionary statement. Attendees discussed the appropriateness of changing “comforters” to “blankets” and the degree to which these products differed. The consensus opinion was that use of the term “blankets” was more appropriate. Attendees then discussed whether, moving forward, a warning would be permitted to continue to use “comforters” if the standard stated that the warning content need only be addressed. CPSC staff stated that “addressed” means that alternative wording can be used only if the meaning is the same and that the discussions surrounding the appropriateness of the two terms, and the TG’s conclusion that one should be used over the other, suggests that the meaning is *not* the same.
- *Button Cell and Coin Battery Warnings.* The chair recommended that the package warnings and instructional literature warnings for replaceable button cell and coin batteries be removed from the recommendations document because there is now an applicable Federal standard for these products. Attendees agreed.

The discussion then turned to new business. The chair noted that a new revision to the ANSI Z535.4 standard, which is referenced in the Marking and Labeling recommendations, was published in 2023. The chair sought feedback on whether the TG should review the new revision to see how the changes affect the Ad Hoc Language recommendations and to possibly update the current reference from ANSI Z535.4 – 2011 to ANSI Z535.4 – 2023. CPSC staff stated that none of the changes in the latest revision to the ANSI Z535.4 standard are relevant to the specific sections cited in the Ad Hoc Language recommendations, so either version of the standard can be referenced. The TG concluded that the reference to the 2011 version can remain, but that a brief statement should be added to the recommendations document noting that although there is a 2023 revision, there is no change in the requirements within the cited sections.

The chair stated that the Ad Hoc Figures task group met earlier this year and work is ongoing. This work will be discussed at the next round of juvenile products subcommittee meetings in Fall.

Next Steps:

The TG chair intends to finalize and issue a ballot reflecting the TG’s revisions to the recommended language document in about a month.