

LOG OF MEETING DIRECTORATE FOR ENGINEERING SCIENCES

SUBJECT: Meeting of the ASTM F15 Ad Hoc Language Task Group

OP PLAN PRODUCT: Warning Signs and Labels

DATE OF MEETING: September 20, 2022

PLACE OF MEETING: Virtual/Teleconference

LOG ENTRY SOURCE: Tim Smith (ESHF)

COMMISSION ATTENDEES: Tim Smith (ESHF), Celestine Kish (ESHF), Kristen Talcott (ESHF), and Suad Wanna-Nakamura (HSPP)

NON-COMMISSION ATTENDEES: Contact ASTM for attendee list

SUMMARY OF MEETING:

This meeting of the ASTM Ad Hoc Language Task Group (“Ad Hoc TG”) was led by the Chair of the task group, Kitty Pilarz. The meeting focused on a proposal from CPSC staff to consider developing a recommended statement related to the restraint use that would warn consumers against placing blankets or other soft bedding between a baby and a product with restraints, as this could interfere with restraint use and effectiveness.

Prior to the meeting, CPSC staff provided the Chair with incident data related to this issue, specific to rockers, swings, inclined sleepers, and bouncers. The Chair summarized the data for the task group, but pointed out that for many incidents it was difficult to tell whether bedding interfered with restraint use. The Chair also provided examples of how various standards currently address warnings about restraint use. The warning language in the standards differed, but many standards use similar language when telling consumers to always use the restraint and to adjust the restraint to fit snugly. CPSC staff stated that perhaps consumers are not using the restraints with very young infants because they do not think swaddled infants require restraining, and that there might be value in emphasizing the restraints should be used even for the youngest infants.

The task group discussed whether the issue was universal enough to lend itself to being addressed by the Ad Hoc TG, or if it should be standard- or product-specific. CPSC staff questioned whether including recommendations that are applicable to only a subset of products or standards makes sense, given that the Ad Hoc Language recommendations are intended to be broadly applied across all juvenile product standards. Staff expressed concern that including such language in the Ad Hoc Language recommendations could lead to all standards including the language by default, even if the issue is not a significant hazard for that product, resulting in extra unnecessary warning text. The task group pointed out that the Ad Hoc Language recommendations document does not include any warning statement recommendations related to

restraint use at all. CPSC staff asked whether it would make sense to develop recommended language for basic restraint use first—for example, “ALWAYS use restraints. Adjust to fit snugly.”—and then consider language related to blanket or soft bedding interference afterwards. The task group generally agreed, but one member expressed concern about the impact of recommending such language for convertible products whose initial use might not include restraints and might be for sleep, where you would not want a restraint to be used.

The Chair concluded the meeting by stating that she would draft the language for basic restraint use and send it to the task group for comment. She then would add this topic to new business to be discussed during the October Ad Hoc TG meeting.