



## MEETING LOG

**SUBJECT:** ASTM F15.18 Non-Full-Size (NFS) Cribs and Play Yards Suffocation Hazard Pictogram Task Group Meeting

**FY 24 OP PLAN ENTRY:** Non-Full-Size Cribs and Play Yards

**DATE OF MEETING:** 3/5/2024

**LOCATION OF MEETING:** Virtual

**CPSC STAFF FILING MEETING LOG:** Stephen Harsanyi (ESHF)

**FILING DATE:** 3/8/2024

**CPSC ATTENDEE(S):** Ashley Johnson (HSPP), Frederick DeGrano (ESMC), and Stephen Harsanyi (ESHF)

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

### Summary of Meeting:

The ASTM F15.18 NFS Cribs and Play Yards Suffocation Hazard Pictogram Task Group convened to discuss potential pictograms and safety messaging to be added to the suffocation hazard warning label required in ASTM F406, *Standard Consumer Safety Specification for Non-Full-Size Baby Cribs/Play Yards*. The task group reviewed new iterations of pictograms, including images modified by CPSC staff. Note: each iteration includes both a positive (“do”) action and a negative (“don’t”) action.

The task group agreed with CPSC staff’s proposed change to depict the infant’s mouth and nose being blocked by soft bedding in the negative action illustration. The task group also agreed with other recommendations from CPSC staff, such as (1) using “shall” language rather than “should” for pictogram size, and (2) placement of the “X” and checkmark such that the symbols do not cover the illustrations. Additionally, CPSC staff recommended that ASTM F406 references the appropriate ANSI Z535 standard for pictograms, ANSI Z535.3, *American National Standard for Criteria for Safety Symbols*. The task group chair explained that there is an approved ballot on administrative hold, which requires conformance to elements of ANSI Z535.4, *American National Standard for Product Safety Signs and Labels*, and Z535.6, *American National Standard for Product Safety Information in Product Manuals, Instructions and Other Collateral Materials*, and the task group will look into whether Z535.3 is necessary.

The task group chair recommended showing a  $\frac{3}{4}$  view of the infant’s face, which is in contrast to the  $\frac{1}{2}$  view used in the CPSC contractor-tested pictogram. The group discussed the benefits of the change. CPSC staff explained that deviating from the tested pictogram risks harm to comprehension; however, CPSC staff agreed that being able to show two eyes may better emphasize that the infant is in distress in the negative action illustration, and also that the  $\frac{3}{4}$  view may make it easier to distinguish the facial features.

The task group discussed whether and under what conditions manufacturers should be able to choose to turn the pictogram 90 degrees. The task group chair explained that, for some products, the vertical height of the top rail can be too small for the pictogram, necessitating turning it on its side. Specifically, the task group chair explained that to keep the pictogram in its current state, consistent with the tested pictogram’s vertical orientation, either the images would have to be reduced in height or the products would have to undergo substantial design changes. CPSC staff again opined that deviating from the tested pictogram without additional testing could result in worse consumer comprehension of the pictogram, potentially even resulting in critical confusion (opposite interpretations). Further, CPSC staff explained that



turning the images 90 degrees makes it more difficult to compare them side-by-side for the differences. The task group reviewed the potential benefits of turning the images sideways for products that cannot fit the vertical images, such as that the horizontal images would be more similar to how a consumer would look down at their infants in the products (from the longer side). The task group also discussed various methods to try to attract the consumer's attention to the infants' heads when the images are turned sideways.

The task group discussed potential changes to the message panel of the warning label, such as whether to include "pillows" and "toys" in the list of items to never add to an infant's sleep area. CPSC staff mentioned that pillows are often cited in incident reports, whereas toys have rarely been reported as contributing to injuries and deaths due to suffocation in play yards and non-full-size cribs. CPSC staff cautioned, though, that any added text should be limited so as not to overwhelm consumers with text and to not stretch the message panel further sideways.

#### **Next Steps:**

The task group plans to meet one additional time before presenting their recommendations to the subcommittee for an eventual ballot. The next meeting has not been scheduled at this time.