



MEETING LOG

SUBJECT: Meeting of the ANSI Z245.3 and .6 Subcommittee on Containers

FY 24 OP PLAN ENTRY: Not on the FY24 Op Plan

DATE OF MEETING: 1/25/2024

LOCATION OF MEETING: Sunny Isles Beach, Fl.

CPSC STAFF FILING MEETING LOG: Sharon White

FILING DATE: 2/9/2024

CPSC ATTENDEE(S): Sharon White

NON-CPSC ATTENDEE(S): Contact ANSI for attendee list.

Summary of Meeting:

This meeting was led by Kirk Sander, Chief of Staff & Vice President, Safety and Standards, National Waste & Recycling Association. The purpose of the meeting was to present CPSC staff's concerns regarding 95 gallon roll out carts and to encourage the ANSI Z245.30 Subcommittee on Containers to form a task group to address staff's concerns.

The meeting began with the participants introducing themselves. Following introductions and opening remarks, Mr. Sander turned attention to CPSC staff to begin presenting. Staff presented the injury data for context, identifying the major hazard pattern as one in which consumers pushed the cart with the lid open and stepped on the lid, causing consumers to fall into the hard edge of the cart and sustain serious injuries. Subsequently, staff informed the group that staff examined and conducted an analysis of several brands of 95 gallon roll out carts in support of CPSC's work on these products. Staff expressed that based on an examination of the products and an analysis of the data, staff concluded that the current voluntary standard for these products is inadequate and that the standard needs to be revised to strengthen the warning requirements and develop performance requirements to reduce the potential for future incidents.

A subcommittee member suggested including a warning on bills sent to consumers and in a CPSC public safety announcement, including a video campaign. CPSC staff indicated that these recommendations could serve as part of an information and education campaign which would be needed to reinforce on-product



warnings. Staff also recommended that the industry in cooperation with the CPSC develop a public safety announcement (e.g., press release) warning consumers about the hazard associated with 95 gallon roll out carts.

A major point of contention was the rate of injury over time involving the subject hazard pattern associated with these products. The group expressed that they need a way to measure performance of the current voluntary standard, so they stated that they need baseline data. They further expressed that the current label may be working. CPSC staff responded that based on discussions with our Hazard Analysis Office it does not appear possible to get injury estimates from our NEISS data for the scenario of interest because hospital intake notes do not tend to have a lot of details about hazard scenarios. However, staff agreed to follow up on this topic with staff from Hazard Analysis.

Another major point of contention was CPSC staff's proposal for revised on-product warnings. A subcommittee member used the illustration of a slippery when wet sign and a hot coffee warning on a cup of coffee. He explained that there was no need to provide any additional details in these warnings to warn the public so why the need to include additional information in the current warning for carts. CPSC staff responded that the hazard in both cases is obvious and that consumers are likely to take appropriate preventive measures. Staff responded that in the case of 95 gallon roll out carts, the hazard is not obvious, and that therefore, the current warning on the roll out carts, (i.e., Keep lid closed while moving) has no motivational content (i.e., rationale behind the precaution) which is needed to increase the likelihood that consumers would comply with the warning.

The group raised other concerns, including that design changes to the product could be expensive which could have unintended consequences.

A task group was formed at CPSC staff's request to address incidents associated with 95 gallon roll out carts.

There was discussion on subcommittee business matters, after which, the meeting was adjourned.

Next Steps:

A task group meeting will be held February/March 2024. Date TBD.