



MEETING LOG

SUBJECT: ASTM F15.16 Infant Feeding Supports Scope Task Group

FY 24 OP PLAN ENTRY: Nursing Support Products

DATE OF MEETING: 3/6/2024

LOCATION OF MEETING: Virtual

CPSC STAFF FILING MEETING LOG: Tim Smith (ESHF)

FILING DATE: 3/7/2024

CPSC ATTENDEE(S): Tim Smith (ESHF), Ashley Johnson (HSPP), Suad Wanna-Nakamura (HSPP), and Tabby Zeb (GCRA)

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

Summary of Meeting:

This meeting of the ASTM Infant Feeding Supports Warnings task group was led by the chair of the task group, Rachael Shagott. The purpose of the meeting was to discuss the warning-related comments and negatives on the balloted draft voluntary standard for infant feeding supports (ASTM ballot F15 (23-20), item 2). The primary topics of discussion were as follows:

- *Warning Length.* There was general agreement within the task group that the current warning was too lengthy. After communications with two commenters prior to the meeting, the chair prepared a revised version of the warning with less content to present to the task group. This version removed some language thought to be redundant or unnecessary. One member also pointed out some statements in the balloted warning that seemed to contradict the actual, intended use of the product (*e.g.*, telling consumers to keep the baby within arm's reach, when you could not use the product for nursing or feeding without doing so).
- *Single- versus Dual-Function.* CPSC staff pointed out that much of the discussion surrounding possible redundant or contradictory language depends on whether nursing pillows are intended to be single-function products. Staff noted that when the warning was being developed by the task group, many of the performance requirements had not yet been developed, and the task group and subcommittee had assumed that many nursing pillows would also potentially have a lounging or propping function. Since that time, the subcommittee has concluded that nursing pillows should be single-function products. Staff stated that whether the nursing pillows are single- or dual-function products affects the language of the warning. The task group discussed this issue, and the consensus was that these products should be for nursing or feeding only.



- **“CAN KILL” Language.** Some members expressed concern about the initial sentence of the warning, which states that using the product for infant sleep or naps can kill, alleging that “kill” implies violence rather than accidental death, was jarring, and that consumers may ‘shut down’ and not read the warning if they see this term. CPSC staff stated that it is not accurate to say that “kill” automatically implies violence, as it is used in some other product warnings and is often used in the context of accidental death, such as “killed by a falling tree” or “killed in a car crash.” Staff stated that warnings and risk communication research and literature, taken as a whole, does not support the idea that consumers automatically will be turned off by language associated with increased threat. Staff also stated that stronger, direct language, such as “can kill,” was needed to motivate behavior because nursing pillows already have warnings about the potential for death by suffocation, and juvenile products with warnings that use such language is common. The task group discussed alternative language that would convey a strong message, but not use “kill,” such as “Babies have died when using this product for sleep or naps.”
- **Warning Format.** The task group discussed possible changes that would affect the format of the warning, such as changing the top, signal word panel of the warning to include “SUFFOCATION” immediately before “WARNING.” Staff stated that this would run contrary to the formatting requirements of the standard and the recommendations of the Ad Hoc Language task group. Staff also noted that this would imply that the entire warning would be related to suffocation and not include language about the fall hazard. Staff stated that although some have claimed that falls from elevated surfaces are obvious, this hazard pattern is one of the most common in the incident data, suggesting that it is not obvious to all consumers.
- **Warning Placement.** The chair presented the task group with mocked-up images of the original warning on a nursing pillow, and the revised, smaller warning on the same nursing pillow, and asked whether the task group should discuss the placement of the warning. The subcommittee chair, who was present, stated that warning placement and the possibility of an alternative “conspicuous” definition was discussed during the Scope task group meeting and will be discussed further at the next meeting.

Next Steps:

The task group will consider what was discussed at the meeting and members can provide any additional thoughts on the issues to the task group chair or subcommittee chair prior to the next Warnings task group meeting, which is scheduled for March 20, 2024.