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Enforcement Policy for Warnings on Clothing Storage Units

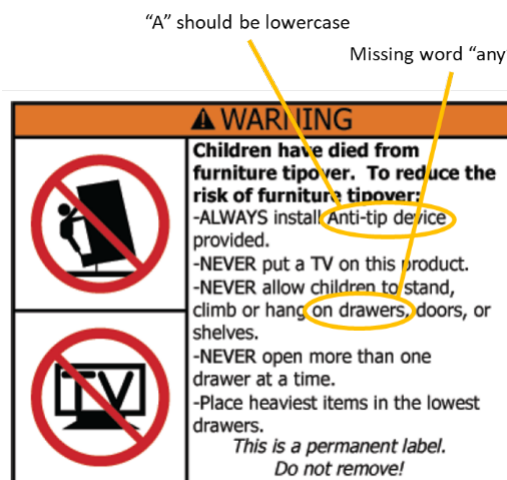
To Whom It May Concern:

I am writing to inform you of the policy of the U.S. Consumer Product Safety Commission (CPSC), Office of Compliance and Field Operations (Compliance) related to an aspect of the warnings required for clothing storage units (CSUs) under the Safety Standard for Clothing Storage Units (STURDY), 16 C.F.R. part 1261, which incorporates by reference ASTM F2057-23. Specifically, with respect to non-substantive variances between the required textual warning statements and the example warning figures in the standard, Compliance will accept either warning.

ASTM F2057-23 requires that each clothing storage unit be permanently marked with specific warning statements detailed in Section 10.2.3. Examples of the required warnings are provided in Figures 16, 17, 18, and 19 of ASTM F2057-23. However, the warnings in these figures vary slightly from the specific warning statements in the text of the same standard:

- Figures 16, 17, 18, and 19 capitalize “Anti-tip device,” whereas it is not capitalized in the warning statements: “ALWAYS install anti-tip device provided.” (ASTM F2057-23 § 10.2.3.3)
- Figures 16 (color version), 18, and 19 omit the word “any,” whereas that word is included in the warning statements: “NEVER allow children to stand, climb, or hang on any drawers, doors, or shelves.” (ASTM F2057-23 § 10.2.3.5)

The figure below shows the color version of the “Figure 16 example warning” in the standard and indicates how it differs from the warning statements detailed in the standard.



ASTM F2057-23 Figure 16 example warning



United States
Consumer Product Safety Commission

Compliance assessed the differences between the warning statement and the figure examples in the standard and determined they are unlikely to affect consumers' understanding of the warning message. Compliance will accept either warning until such time as the standard is updated to align them.

Thank you for your cooperation.

Sincerely,

Robert S. Kaye

Robert S. Kaye

Director

Office of Compliance and Field Operations