



December 13, 2021

Molly Lynyak, MPA
ASTM International
F15 Staff Manager
100 Barr Harbor Drive
PO Box C700
West Conshohocken, PA 19428-2959

RE: CPSC Staff Request for Formation of a Subcommittee to Address Hazards Associated with Infant Support Pillows

Dear Ms. Lynyak:

U.S. Consumer Product Safety Commission (CPSC, Commission) staff¹ requests that ASTM International form a working group under the F15 committee to develop a voluntary standard containing performance requirements to reduce the risk of death and injury due to hazards associated with infant support pillows, such as nursing pillows. Staff is concerned with the deaths associated with these products when they are used to support infants outside of nursing.

Attached, please find incident data for nursing pillows from manufacturers, received between January 1, 2010, and September 30, 2021, yielding 141 incidents reported through the Consumer Product Safety Risk Management System (CPSRMS) and an additional 121 incidents reported through National Electronic Injury Surveillance System (NEISS)². Among the 141 CPSRMS incidents, there were 135 incidents involving a fatality, and among the 138 NEISS incidents, there was 1 death.

In addition, staff has included incident data for loungers and other infant support pillows. These incidents were not identified as C- or U-shaped nursing pillows, but included products marketed as baby loungers or baby pillows. Staff reviewed these “pillow” incidents closely and included items that were clearly marketed for infants or babies. Items that staff identified as throw pillows, pregnancy pillows, and adult bed pillows were not included. Therefore, although the term in the narrative may say “pillow,” staff is confident it was a pillow that was intended for babies. Most of the CPSRMS reports involved fatalities (38 of 48).

Staff reviewed many of these products and identified that they are marketed and labeled as “not for sleep,” and staff found incidents involving sleeping nonetheless; therefore, staff does not believe that

¹ The comments in this letter are those of the CPSC staff and have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

² Note that 2021 NEISS data are preliminary and subject to change. 2021 NEISS data will be finalized, and hospital weighting determined in spring 2022.



warning and labeling are sufficient to prevent the foreseeable-use pattern of caregivers allowing infants to sleep in these products. Staff understands that infants, especially the youngest and most vulnerable, fall asleep easily in many products, but we believe there may be performance standards that can reduce the likelihood of the product being used outside of the nursing environment. In addition, performance standards may reduce the likelihood of an infant encountering a life-threatening situation should they fall asleep while propped sitting or placed prone for “tummy time.”

In closing, CPSC staff requests the formation of a working group under the F15 committee to develop a voluntary standard containing performance requirements to reduce the risk of death and injury due to hazards associated with infant support pillows, such as nursing pillows. Staff is aware that ASTM has recently started a group to work on infant loungers, with a first meeting on January 11th, 2022, and believes the upcoming group would be interested in these data.

Sincerely,

A handwritten signature in black ink, appearing to read "Hope Nesteruk", written in a cursive style.

Hope E J. Nesteruk
Children's Program Manager
Directorate for Engineering Sciences

CC: Jacqueline Campbell, Voluntary Standards Coordinator
Meredith Birkhead, Product Safety & Certification Associate, JPMA
Rachael Shagott, Chair, new subcommittee on Infant Loungers

Attachment(s): Incident data table