



December 1, 2025

TRANSMITTED VIA EMAIL

Ms. Heather Darrah  
Technical Director  
Portable Generator Manufacturers' Association  
1300 Sumner Avenue  
Cleveland, OH 44115-2851

Dear Ms. Darrah:

U.S. Consumer Product Safety Commission (CPSC) staff<sup>1</sup> has observed an ongoing issue of consumers disabling the CO shutoff system on portable generators advertised as G300-certified. As stated in staff's briefing package for the supplemental notice of proposed rulemaking for portable generators,<sup>2</sup> staff has observed videos on social media of people instructing how to bypass or defeat the CO shutoff system on current shutoff-equipped generators. Many of these videos, which staff observes are for many different brands and models, include numerous follow-up comments from other consumers stating that they had already followed, or were intending to follow, the instructions for their portable generator. Despite these videos, to-date, CPSC staff is not aware of any safety incidents involving this issue.

CPSC staff recommends that the Portable Generator Manufacturers Association (PGMA) address this issue by improving the tamper resistance requirements in *ANSI/PGMA G300-2023 Safety and Performance of Portable Generators*. Currently, these requirements (which are the same in both G300-2018 and G300-2023) allow a compliant generator to be started and operated even if the consumer has made its CO shutoff system inoperable. This is concerning because if the CO shutoff system is inoperable on a G300 generator, it presents the same risk of CO poisoning as a noncompliant generator.

According to Section 3.9.1.2.1, the shutoff system is considered tamper resistant when all parts that

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<sup>1</sup> This letter was prepared by the CPSC staff. It has not been reviewed or approved by, and may not represent the views of, the Commission.

<sup>2</sup> CPSC Staff Briefing Package: Draft Proposed Rule For Portable Generators, January 28, 2023.

<https://www.cpsc.gov/s3fs-public/SupplementalNoticeofProposedRulemakingSNPRSafetyStandardforPortableGenerators.pdf?VersionId=zxwp.NpJj8nNCxLf7Clp3zMVqLB1MrgE> (Document ID CPSC-2006-0057-0118 in [www.regulations.gov](http://www.regulations.gov))



affect the proper operation of the shutoff system meet at least one of the following: (1) the part is permanently sealed; (2) the part is not normally accessible by hand or with ordinary tools; or (3) removal or disconnection of the part prevents the engine from running. Section 3.9.1.2.1 allows for different parts of the shutoff system to meet the requirement for tamper resistance using any of the three options, provided that all parts meet at least one of the options.

Staff recommends requiring item (3) to be mandatory and adding a requirement that precludes the generator from being able to operate, or continue to operate, when the CO sensor is bypassed in the circuitry. Staff also recommends incorporating a test method into G300 that would test the generator's susceptibility to nuisance shutoffs.

Staff asks PGMA's technical committee to consider these recommendations for revisions to the standard alongside staff's recommendations regarding fuel leaks that staff sent to PGMA in December 2023 and April 2024.

Staff looks forward to continued cooperation with PGMA to improve the safety of these products for consumers.

Sincerely,

Han Lim  
*Program Manager for Mechanical Hazards*  
*Division of Mechanical and Combustion Engineering*  
*Directorate for Engineering Sciences*

Cc: ULSE, Project Manager for UL 2201  
Jacqueline Campbell, CPSC Voluntary Standards Coordinator