



United States
Consumer Product Safety Commission

April 2, 2025

Ms. Joan Lawrence, ASTM F15.22 Subcommittee Chair
Mr. Jos Huxley, ASTM F15.22 Task Group Chair
ASTM International
100 Barr Harbor Drive
West Conshohocken, PA 19428

Dear Ms. Lawrence and Mr. Huxley:

On May 14, 2024, UL published ANSI/CAN/UL 3300:2024 *Standard for Safety of Service, Communication, Information, Education and Entertainment Robots – SCIEE Robots*. This standard contains performance requirements and test methods to address potential product hazards associated with robotic functions, such as crushing forces or entrapments with humans. However, robots identified as toys are considered out of scope of the UL standard.

U.S. CPSC staff¹ is concerned that robotic toys are prevalent in the marketplace including robotic building sets and child companion/play/learning robots that may be considered a toy rather than an educational product. Robots can be developed with the potential for increased physical interactions, such as hugging, grabbing, pulling, and lifting. Safety requirements that consider children's interactions with robotic products should be developed to address potential hazards to children. CPSC staff has recently begun a data review to look for robot-human interaction issues including for toy robots and will provide such data as they are identified.

CPSC staff recommends that the ASTM F15.22 Subcommittee develop safety requirements to address potential robotic toy hazards in ASTM F963, *Standard Consumer Safety Specification for Toy Safety*. A review of the requirements in ANSI/CAN/UL 3300:24 standard may be an appropriate starting point for a task group to begin considering requirements for robotic toys. If you have any questions or need additional information, please reach out to staff accordingly.

Sincerely,

Benjamin Mordecai

Benjamin Mordecai,
CPSC Project Manager for Toy Safety

¹ The views or opinions expressed in this letter are solely those of the staff, and these views and opinions do not necessarily represent those of the Commission.



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