



UNITED STATES  
**CONSUMER PRODUCT SAFETY COMMISSION**  
4330 EAST WEST HIGHWAY  
BETHESDA, MD 20814

COMMISSIONER RICH TRUMKA JR.

**PROPOSED REVISION TO 16 C.F.R. § 1231,  
SAFETY STANDARD FOR HIGH CHAIRS**

**APRIL 20, 2022**

In order to ensure that CPSC standards governing infant and toddler products always grow more protective, the Commission can only accept changes to our standards that improve safety. It is my opinion that ASTM's proposed revisions to the high chair standard do not improve safety, they are safety-neutral, and so I must vote against them.

Four years ago, the Commission determined that industry's voluntary standard governing high chairs was protective enough to adopt as a CPSC mandatory rule. Now, industry seeks to change the voluntary standard that the Commission adopted. In these situations, the Commission has a gatekeeping role. If the changes improve safety, we allow them to pass into effect. However, where they harm safety or are safety-neutral, the Commission must object and stop them from taking effect.

My vote is not an indictment of CPSC's mandatory rule on high chairs—it is safe and protective. Rather, my vote reflects that no update can occur under Section 104 unless it improves safety. No matter how strong a rule is, there is always room for improvement.

In the future, I expect that voluntary standards bodies will provide all necessary evidence to demonstrate to the Commission that a revision to a product safety rule under Section 104 of the CPSIA *improves* safety if they wish that standard to go into effect.