

November 15, 2024

TRANSMITTED VIA EMAIL

Molly Lynyak
ASTM F15 Staff Manager
ASTM International
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

RE: Administrative Ballot– F15.21– Standard Consumer Safety Specification for Infant Loungers

Dear Ms. Lynyak:

U.S. Consumer Product Safety Commission (CPSC) staff¹ is casting a negative vote on this administrative ballot. As stated in the ballot, a negative vote means that the group would not discontinue work but would continue to work on the draft ASTM standard with the intention of publishing a standard.

On October 16, 2024, the CPSC voted 5-0 to publish a final rule establishing a safety standard for infant support cushions. The final rule is effective on May 5, 2025, and will require all infant support cushions manufactured for sale after the effective date of the final rule to meet the new requirements, available at: www.federalregister.gov/documents/2024/11/04/2024-25181/safety-standard-for-infant-support-cushions. Staff recommends that the subcommittee continue work to publish a voluntary standard for infant loungers that adopts requirements in the final rule. Staff values the insights, collaboration, and knowledge of the manufacturers, retailers, trade organizations, laboratories, consumer advocacy groups, consultants, and the public provided through the voluntary standards process. A published voluntary standard would allow for continued collaboration on safety improvements for these products, including continued collaboration on the warnings and performance requirements, that could then be considered by the Commission for inclusion in the regulation.

In December 2021, staff sent a letter² requesting that ASTM form a working group to develop a voluntary standard to reduce the risk of death and injury from hazards associated with infant pillow

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

² CPSC staff letter, available at: www.cpsc.gov/s3fs-public/Nursing-and-Support-Pillow-VS-request.pdf?VersionId=SIRjiA7nbiNFkVXutkgwUxcO7kvbxdAb

products. In response to staff's letter, ASTM formed two subcommittees intended to develop two separate voluntary standards: the F15.16 Infant Feeding Supports subcommittee, to develop a standard for nursing pillows, and the F15.21 Infant Loungers subcommittee. Since the formation of the Infant Loungers subcommittee, staff has actively participated in this subcommittee to develop a voluntary standard that addresses hazards associated with these products. In addition to attending subcommittee meetings, staff has joined and participated in all scope, data analysis, warnings, and performance requirements task groups. In response to the drafts of the infant lounger's voluntary standard included in ballots F15.21 (24-01) and F15 (24-18), staff sent letters³ commenting on the ballots. Staff has actively participated in analyses of incident data and the development of performance requirements, test methods, and warnings contained in the draft voluntary standard. In fact, the Commission's final rule for infant support cushions incorporates many of the same requirements included in the draft voluntary standard for infant loungers.

As noted in staff's previous letter, dated October 16, 2024, consistent with the Commission's decision, staff believes that the requirements in the Commission's final rule are necessary to address the hazards to infants from all infant support cushions, including infant loungers. Staff urges ASTM to align the draft standard with that regulation, including both scope and performance and warnings requirements, to address the suffocation, fall, and entrapment hazards to infants posed by infant support cushions. Any improvements to the requirements in the draft standard could then be considered by the Commission for inclusion in the regulation.

Staff encourages the subcommittee to publish a voluntary standard and looks forward to continuing to work with the subcommittee to improve the safety of these products.

Sincerely,

Ashley Johnson, Ph.D.
Physiologist
Directorate for Health Sciences

cc:

Rachael Shagott , Subcommittee Chair for ASTM Infant Loungers
Don Mays, ASTM F15 Chair
Jailynn McGhee, JPMA Government Affairs Standards and Certification Associate
Daniel Taxier, CPSC Children's Program Manager
Jacqueline Campbell, CPSC Voluntary Standards Coordinator

³ CPSC Staff Comment to Ballot F15.21 (24-01) ASTM F15.21 on Infant Loungers, available at: www.cpsc.gov/s3fs-public/CPSCStaffCommenttoBallotASTMF1521onInfantLoungers.pdf?VersionId=tGM05rvyA6WCUzQxHFCdkVHVxRLbtQLv.

CPSC Staff Comment to Ballot F15 (24-18) ASTM F15.21 on Infant Loungers, available at: www.cpsc.gov/s3fs-public/staff-comment-to-ballot-ASTM-F15-21-on-infant-loungers.pdf?VersionId=oMjqKOhKBI0IEWiQliiCJ3u3OP2XcB7n.