



MEETING LOG

SUBJECT: ASTM F15.30 Bunk Beds Guardrail Task Group Meeting

FY 24 OP PLAN ENTRY: [Not on the FY 24 Op Plan]

DATE OF MEETING: 7/10/2024

LOCATION OF MEETING: Virtual (Microsoft Teams)

CPSC STAFF FILING MEETING LOG: Tim Smith (ESHF)

FILING DATE: 7/11/2024

CPSC ATTENDEE(S): Tim Smith (ESHF) and Daniel Taxier (ESMC)

NON-CPSC ATTENDEE(S): Contact ASTM for the full attendee list

Summary of Meeting:

This meeting of the ASTM F15.30 Bunk Beds Guardrail task group (TG) was led by the TG chair, Stefan Svensson. The purpose of the meeting was to discuss possible requirements for a guardrail to be added to the lower bunk on the side closest to an adjacent wall and for warnings related to the placement of the bunk bed relative to the wall. The chair began the meeting by describing the objective of the TG and the recommended process for developing the requirements. The TG agreed with the general approach outlined by the chair. The chair stated that the TG will have to consider the possible introduction of risks to young children by adding a guardrail to the lower bunk and that incident data from CPSC will help inform the TG on this issue. As noted during the subcommittee meeting in May, CPSC staff intends to pull recent incident data for bunk beds.

The TG discussed warning language in the European bunk bed standard, EN-747-1, that addresses placement of the bunk bed relative to surrounding structures, and discussed two proposals for alternative warning language. The TG agreed that some of the distances recommended in the warnings for placing the bunk bed might need to change to account for the lower bunk being more accessible to younger children than the upper bunk. The TG noted that the listed dimensions were likely based on the torso probe that is used for testing bunk bed openings. CPSC staff stated that a smaller torso probe would make more sense for guardrails and spacing on a lower bunk and suggested that the TG consider the probe used in other product standards with requirements intended to address the risk of entrapment to younger children, such as toddler beds or portable bed rails. Staff also pointed out that the standard for inflatable air mattresses includes a warning to address possible entrapment against structures surrounding the mattress and that this might be useful when developing the warning for bunk beds.

The TG discussed possible language for the guardrail requirement, based on the language of the Federal requirement for upper-bunk guardrails. The initial proposal was to specify that the long side of the lower bunk opposite the ladder or stairs would be required to have a guardrail, but other alternatives were discussed to account for bunk beds whose ladder was on an end structure, such as specifying that the guardrail must be on



a long side that does not include a ladder, or that the guardrail must be on the same side as the full-length guardrail on the upper bunk. TG members will consider these and other alternatives during the interim before the next TG meeting.

The TG discussed whether new warning language pertaining to lower guardrails should be incorporated into the existing bunk bed warnings or should be a separate warning label, and discussed whether warnings should be both on the product and in the product instructions. CPSC staff supported providing the warning both on the product and in the instructions, specifically in the section related to assembly. Staff also stated that a separate warning on or near the lower guardrail might be more effective than adding the language to the existing on-product warning.

The chair raised the question of whether it would be best to issue a single ballot that addresses both the warning and guardrail requirements or to issue separate ballots. The TG agreed that, for now, it would be good to consider both issues together since they are interrelated. The TG also briefly discussed how bunk beds that do not meet the proposed requirements would be affected once the requirements are added to the standard.

Next Steps:

The chair intends to forward the draft requirements that were discussed during the meeting to the TG for review and feedback. The next meeting of the task group was scheduled for September 26.