

SUBJECT: ASTM F15 Juvenile Products Subcommittee Meetings

DATE OF MEETINGS: October 21-23, 2019

LOCATION: ASTM Headquarters, West Conshohocken, PA

CPSC ATTENDEE(S): Hope Nesteruk (ESME), Celestine Kish (ESHF), Suad Wanna-Nakamura (HSPP), and others attended for specific meetings or via telephone

NON-CPSC ATTENDEE(S): Contact ASTM for attendance list

SUMMARY OF MEETINGS:

Monday October 21, 2019

F15.16 Floor Seats: Kevin Lee (ESMC), Lawrence Mella (ESMC)

Stability task group: Focused on looking at the stability of recalled product. Initial focused on occupant retention, but went hand in hand with stability. Rearward stability appeared to be the issue. Task group is ready to send to ballot.

F15.18 Bedside Sleepers: Kevin Lee (ESMC), Lawrence Mella (ESMC). Phone: Tuere Williams, Keysha Walker

Ballot results: Reapproval passed.

Task group reports: Ad hoc language. Never met. Will regroup with Ken as chair.

F15.59 Children's Chairs: Kevin Lee (ESMC), Lawrence Mella (ESMC). Phone: Jill Jenkins (EC)

Scissoring/Shearing, work has been ongoing

Ballot results – no negatives. Several comments. Will be approved and published.

Metz – asked for stronger rationale, subcommittee chair explained the rationale more.

Ware – asked for latching AND locking instead of latching OR locking. Will do, editorial.

Cowles – She is good. Misunderstood something.

King – Thought there was a mistake in numbering. Editorial.

Chair requested that ASTM notify CPSC of the revision

New business – Circular holes (5.9) vs other standards use openings. Opening applied to slots vs only holes. Keysha told Brian CPSC technical staff said this was for finger amputation. Did not specify which staff.

Chair requested an incident data pull for the next round of meetings.

F15.16 Highchairs: Kevin Lee (ESMC), Lawrence Mella (ESMC). Phone: Stef Marques, Carlos Torres, Jill Jenkins (EC)

Ballot results:

19-07, Item 2 – Drago negative, had issues with the wording either reclining or upright, when it should be both. Negative withdraw because there will be a new ballot to correct this.

Task groups:

Infant seats – task group has completed work toward a new proposal. Subcommittee went through it line-by-line and refined the proposal, which will go out to ballot. Along with a second attachment that details other parts of the standard that will need to be revised for an infant only high chair, including adding some guidance that came from CPSC staff in the revised definition. Tyler suggested moving to a note.

New Business: CPSC rejected F404-18

F15.18 Inclined Sleep Products: Kevin Lee (ESMC), Lawrence Mella (ESMC). Phone: Tuere Williams, Chris Nguyen, Rana Balci-Sinha (ESHF), Jill Jenkins (EC)

One victim mother at meeting.

Agenda reorg, move NPR discussion above task groups.

Cel reported on the supplemental NPR package, Commission to vote by Friday. Cel explained this was the staff package, but not final because the Commission needs to vote that Friday. Dr. Mannen was on the phone to answer questions. Staff recommendation was to address infant sleep products that are not currently covered by another standard. Any product that comes onto the market must meet a current standard. Summarized the staff recommendation that anything that doesn't fall under an existing standard would fall under the bassinet standard.

Questions raised during discussions:

What is the point of having the IISP standard?

What is the definition of a sleep product?

What is the definition of a compact sleeper?

Does the NPR refer to the IISP standard now?

Does the “must fall under a standard” mean a voluntary standard?

What about products, like in-bed sleepers, which would need additional warnings from bassinets?

What about new products coming into the market? We are going to stifle innovation...

Bassinet standard exempts certain products, such as pop-up tents.

In-bed sleeper side height should be shorter than bassinets...

What about “loungers” and “resting”?

Renaming of product, i.e., renaming the RNP as a “soother”. Health Canada staff explained how this worked in Canada, which was that one can market yourself into the regulation by marketing for sleep, but cannot market yourself out of the standard if the product is otherwise obviously for sleep.

Dr. Mannen summarized the work they did. Including team qualifications and the incident review, product evaluation/analysis, and described biomechanical testing.

F15.17 Stationary Activity Centers: Kevin Lee (ESMC), Lawrence Mella (ESMC). Phone: Jill Jenkins (EC)

The subcommittee discussed the Ad Hoc ballot F15(19-09) item 3, which had one negative. The vote was concerned Ad Hoc should only dictate the warning language and not the location. The subcommittee chair found the negative persuasive and will re-ballot. Other editorial changes were made.

The chair discussed the progress of the two task groups:

-Strap integrity task group:

Met once since last subcommittee but did not get a chance to put their recommendations into a ballot due to lingering questions. They will have one more meeting to finalize their recommendation (a redundant system that has separate attachment points from the primary suspension system and has no loading during normal use or a 120,000 cycle dynamic load test).

-Super seat task group:

Met in April. The intent was to make it clear infant floor seats are not a part of this standard’s scope by adding in clarification in section 1.3. The subcommittee approved the language and it will go out for ballot.

F15.21 Hand-Held Carriers: Kevin Lee. Phone: Jill Jenkins (EC)

The currently chairs, Don Huber’s, is resigning and Dan DiSimone is taking over

Ballot results:

F19-09, item 13:

Discussed negatives:

One negative was because shopping carts already have this warning, adding this warning to the HHC would distract from others. The ballot was to put in the instructions, not on the product. Therefore, negative was withdrawn.

Admin negative for timing purposes.

One negative was “most likely” editorial. If not, will be considered persuasive and reballoted.

19-09 item 14 (ad hoc)

Discussed negatives. Overall, the negatives were persuasive and the ballot will be withdrawn, revised, and rebalotted.

Task groups

Carry handle – Proposal was discussed, with the next step to be lab testing.

Warnings task group – Will continue work on warnings for rebalotting.

New business

Requested incident data pull for next round of meetings.

F15.18 In-Bed Sleepers: Kevin Lee (ESMC). Phone: Jill Jenkins (EC)

The subcommittee discussed the direction of the subcommittee in light of the CPSC SNPT. They are looking at relying on ASTM F2194 for ~95% of requirements, and then consider adding to warnings.

The chair recommended merging the three task groups into F3118 product development in light of the CPSC staff's position with IISPs.

Tuesday, October 22, 2019

F15.18 Infant Rockers: Kevin Lee (ESMC).

Ballots F19-09, Item 9 Ad Hoc

One negative was persuasive and will go back to ballot to change a Caution to a Warning.

No old business.

New business

Request from a lab to review a new product that pivots. Is it a rocker, bouncer, or a swing. The subcommittee agrees it is a rocker, as it was not powered like a swing nor does it bounce up and down like a bouncer.

Health Canada raised the issue that HC believes rockers are not for sleep.

F15.21 Infant Swings: Kevin Lee. Phone: Keysha Walker

Discussed the ballots:

Ballot F19-09 item 15 was about the strangulation in infant swings from the exposed straps connecting the seat pad to the product's metal frame. There were 2 negatives. One negative was withdrawn.

The Ad Hoc Ballot had 1 negative. He was concerned that this ballot and the cradle swing ballot are editing different sections at the same time. The negative was found persuasive and therefore will be rebalotted. Julia will combine the two ballots and send out again.

New Business: Section 4 restraints – Cradle swing is for sleeping, so it cannot have a restraint, but that is not specifically stated. Need to address in task group.

F15.20 Infant Bathers: Kevin Lee. Phone: Keysha Walker

Both ballots passed and will be published soon.

No task groups, no old business.

New business

The subcommittee discussed warnings on foam products. Including if foam products are in the standard, and if so, how do warning labels work. For example on sponge-like open cell products, printing a label would be difficult and potentially illegible. One member asked to exempt open cell products. Task group was formed to discuss further.

Additionally, there was a comment to add “smooth” before test surface – correcting term.

The chair asked for a data pull for the next cycle of meetings.

F15 Ad Hoc Scope: Kevin Lee Phone: Tuere Williams

Infant Travel Tents – reviewed new incident.

Tricycle/Stroller & Wagon/Stroller– reviewed incident data. No patterns. There will be more discussion in strollers, specifically on the tricycle/stroller combo.

Revision of Scope Chart (Attachment D) – will be revising the scope chart, and will incorporate recent decisions on in-bed sleepers, and to be reordered in standard numerical order.

Also the group is considering adding guidance that would move definitions of products into the scope of the standard, but will move to ad hoc language for further discussion.

New items:

The group looked over a product similar to a walker, but for crawling. The walker subcommittee chair will be informed of this product.

F15 Ad Hoc Language: Tim Smith.

The Task Group Chair noted that Revision E is now the most current version of the Ad Hoc Language Task Group recommendations document on the ASTM website. The discussion then turned to new business, which addressed the following issues:

- One member commented on non-replaceable batteries still being accessible. There is an EN requirement that even non-replaceable batteries must be capable of being removed for disposal.
- Attendees discussed proposed revisions to the recommended battery-related warning and cautionary statements for Instructional Literature, based on recommendations from CPSC electrical engineering staff. Some of the discussion focused on references to “used,” “old,” and “dead” batteries, and the extent to which these terms were appropriate in the warnings. The Chair decided to revisit this issue within the task group.
- The task group will consider adding a new section to address warning and label permanency.

- There was some discussion about whether “exceeded” is the proper term to use in the recommended language for the Torque Test. The group agreed to keep this term because it is consistent with the language that appears in 16 CFR 1500(e).
- The task group agreed to move the statement, “For products that require warnings on the package,” before Z.7 to clarify that not all products need warnings on the package. This statement also will be placed within brackets to indicate that this statement itself is not intended to appear in standards.
- There was some discussion about whether the requirement for each product and its retail packaging to be marked or labeled to indicate the name, place of business, etc., could be revised to exempt packaging from this requirement if the product has this information and it is readily visible through the packaging. CPSC staff stated that this allowance might be in violation of the CPSIA and would look into it.
- One member suggested that the recommendations document include a note to remind people to add ANSI standards to the list of referenced standards, even though ASTM tends to add them to this section automatically during a standard revision.
- The group briefly discussed the definition of “double action release system” in the recommendations document, and how it related to independent wheel brakes on a stroller. The consensus of the group was that two brakes that have to be released separately do not meet the definition of a double action release system. The group suggested that the Strollers subcommittee revisit their use of “double action release system.”

The recommendations document will be updated to reference the ANSI standard consistently throughout.

F15.21 Frame Carriers: Tim Smith, Kevin Lee, Kristen Talcott.

No ballots

Task group reports

Ad hoc task group – Reviewed a bunch of changes throughout the standard to align the standard with the ad hoc recommendations. Will go back to task group to continue work.

Scope & Warnings – Question about weight limit, should it remain as a hard limit at 50 lbs or should it be generally between X and Y, and then testing will be tied to manufacturer recommendations. The whole standard will need to be reviewed to check weight limits throughout.

The chair urged manufacturers to attend the scope and warnings task group as they have no representation in the task group.

New business:

The chair mentioned frame carriers worn at the front or side. Should the scope of the standard be modified to allow these types of designs? This was added to the memory sheet as several members could not envision a comfortable carrier in this design.

There was a question about where the strangulation warnings originated from (leg openings similar to strollers?)

CPSC staff joined task groups and will reach out to manufacturers to try to get some to join.

F15.17 Carriages & Strollers: Tim Smith, Kristen Talcott Phone: Brian Baker, Carlos Torres

No ballots.

Task group reports

Brake accessibility – Proposal read to review. Access zone is based on EN standard. The chair proposed adding and exemption for multiple single action release parking brakes located within the access zone based on discussion of the definition of a double release system in the Ad Hoc Language Task Group meeting. The group discussed making the access zone illustrations more clear, the intention of the barrier/frame with relation to access under the seat, CPSC staff expressed concern with the new exemption, and wording with requirements applying to each brake vs. the parking brake system. The group will continue to discuss and refine the language and figures in the task group.

6.2.5. took Note 5 out and made it 6.2.5.1 unacceptable conditions.

The group discussed allowance and the brake to be a double action release mechanism or multiple single action brake releases to fully release the brake(s). Discussion that it should perhaps focus on the braking system release, rather than “each parking brake.”

Jogger wheel detachment – Work is still ongoing. Potentially looking at rolling road test.

Stroller-tricycle: The discussion of these products continued with a presentation by one manufacturer of combination product. The presentation recommended and exemption for combination products. The task group will continue discussions.

F15.21 Soft Infant Carriers Tim Smith, Kristen Talcott.

Ballots:

19-05, item 4 – to uphold the subcommittee finding of non-persuasive on a negative. Passed.

19-09, item 18

Admin negative only.

19-09, item 19

Chair is holding publication for a few more ballots, so as to publish one revision with all work.

Task groups

Leg openings and labeling – Task group work is ongoing to test leg openings in all positions. Subcommittee reviewed proposal and offered a few tweaks. Work is also still ongoing with the labeling proposal, which was also reviewed and discussed. Both will go back to task group for additional work.

Fastener strength – Looking into the European structural integrity standards. Removing static load test BECAUSE it will add in the EN dynamic test of 50,000 cycles. Changing to EN test torso. Additional task group work. Also add “fabric tearing” as a structural failure, per 6.2.1.

F15.21 Sling Carriers Tim Smith, Kristen Talcott.

Ballot F19-09 Item 20

The negative was withdrawn with editorial changes.

Looking at November 1 approval and a January notification to CPSC.

5 years review if not needed because of impending publication.

Task groups

Babywearing apparel: A task group member made presentation detailing “skin to skin” carrying. According to the presentation, baby can only be carried vertically, between breasts in these products. Presenter seemed to be saying products are not for transport of babies, but contended tests are for transport purposes. In addition, she felt the warning labels are too big and need expensive stretch printing. She concluded with two potential avenues. Both involved specifying a different test mass that was more anthropomorphic and modifying tests currently in the standard.

Ad hoc/Warnings – Task group will have something ready for the next meeting.

New business –

Discussion about adding additional warnings (*e.g.*, a fire hazard) to a warning label. This is a hazard included in the instructions only, due to lack of established hazard patterns. Topic will move to the sling ad hoc task group.

F15.11 Bed Rails: Tim Smith, Kristen Talcott.

Ballot results

19-09 Item 1 (sheet fabric content)

Passed. Drago comment was editorial.

New standard is expected to be approved in November and ASTM will notify CPSC afterward.

New business:

Incident data was review. The last four IDIs were requested.

Wednesday, October 23, 2019

F15.18 Full-Size Cribs: Tim Smith (ESHF). Phone: Jill Jenkins (EC).

Straight to new business

- Discussed cleaning up the language regarding screws. Task group formed.
- Discussed the 5.12 record keeping requirement. A suggestion was made to remove the section because it is redundant with CPSIA requirement. Considering changing to a note.

F15.57 Commercial Cribs: Tim Smith. Phone: Tuere Williams. Phone: Jill Jenkins (EC).

Ballot Results

F19-09 Item 23

One negative, withdrawn after editorial changes were made. A revised standard will be published.

New business

Reviewed incident data and requested redaction of 120921CCC1003.

One complaint that an evacuation crib did not have brakes on wheels. Discussion that maybe brakes would make evacuation slower. However, most products on the market already include brakes, so it doesn't seem like it would be an issue with evacuation.

Subcommittee seemed to be in favor of considering adding them. Task group formed.

F15.19 Infant Bedding: Tim Smith. Phone: Jill Jenkins (EC), Sandy Inkster

The chair reminded the subcommittee that the standard was overdue for revision, and needs to be revised or reapproved by December 2020 or it will be withdrawn.

The subcommittee discussed the results of the ballot, which received seven negatives and three comments. Two negatives were withdrawn because the issues were primarily editorial and there was agreement that the subcommittee will address the non-editorial issues in the next revision to the standard. Four of the remaining five negatives objected to issuing a standard for crib bumpers when such products are inconsistent with safe sleep principles. The subcommittee concluded that this issue was not within the scope of the ballot, as it is not up to ASTM to ban a product. The subcommittee also expressed a desire to ensure some level of safety for those crib bumpers on the market, because not having a standard would mean that these products would not be subject to any requirements.

Additional issues raised in the five remaining negatives included the following:

- No comment. One negative included no content other than "no comment." The Chair followed up with the commenter, who stated that his negative was because he was tired of seeing so many revisions to ASTM standards, was experiencing "standard revision fatigue," and wanted it to stop. The subcommittee did not consider this issue to be within the scope of the ballot item.
- The phrase "Fall Hazard" should be added to the warning language related to infants using crib bumpers to climb out. The subcommittee discussed this issue and pointed out that the crib standard includes a similar hazard description in its warning. CPSC staff pointed out that this could make the inclusion of this phrase in the crib bumper warning redundant and potentially unnecessary, particularly since the warning explicitly states that the bumper can allow a child to climb out. The subcommittee also noted this issue was discussed at length in task group and it was decided that the fall hazard should not be explicitly stated because (1) the potential hazard is not limited to falls and

could include access to other hazards in the room, and (2) there is very limited data supporting the idea that bumpers increase the fall hazard.

- The warning language related to suffocation should state that infants have or can suffocate in crib bumpers. The subcommittee pointed out that this issue was discussed in task group and that the balloted warning language of “reduce the risk of suffocation” was selected because the warnings are being applied to both crib bumpers and mesh liners. There are no clear suffocation incidents in mesh liners, and warning about bumpers on mesh liners could be confusing to consumers.
- Adding a firmness requirement without an accompanying breathability or airflow test is irresponsible. The subcommittee discussed the challenges associated with developing an airflow test. However, the subcommittee concluded that not including an airflow test was not a valid reason for preventing a firmness requirement from being added to the standard.
- The rationale in the appendix should not state that there are no known suffocations involving bedding less than 2 inches thick. The subcommittee could not confirm that there have been suffocations on bedding less than 2 inches thick, and noted that this is a non-mandatory portion of the standard.

For the reasons described above, the subcommittee found the negatives not persuasive.

One commenter on the ballot raised questions about whether the nursery items referenced in the scope of the standard are intended to include all types of bedding or textile products and accessories, not just crib-specific ones. The subcommittee agreed to add this issue to the memory sheet for future consideration.

The subcommittee also discussed an abstention with comment by CPSC staff that identified two errors on the ballot, both of which were also identified in a withdrawn negative and considered editorial, as well as a bullet list of items to consider for future revisions of the F1917 standard, which staff briefly summarized for the subcommittee.

Meeting concluded with the Chair pointing out that the ballot was approved and will now move forward.

F15.66 Crib Mattresses: Tim Smith. Phone: Steve, Jill Jenkins (EC)

No Ballots

Task group reports

Cyclic testing: Reviewed testing results. CPSC staff and one manufacturer have done testing. Another manufacturer is still fixing their machine and plans to conduct additional testing. Subcommittee is still discussing the appropriate mattress support for the test (*e.g.*, concrete, plywood, spring base).

Non-segmented mattress: Task group has come up with a consensus proposal that is ready for ballot.

Compression: Discussed the concern for crib mattress compressing from sheets, which can lead to greater gaps between the crib mattress and crib sides. CPSC staff discussed testing of one of staff’s personal crib mattresses per F2933 section 6.2, and will get the subcommittee more information about the crib mattress. In addition, there have been a number of reports of mattresses being compressed by sheets, causing gaps. One incident, in particular, involved a child entrapped in a corner gap. In addition, it was noted that memory foam is against AAP recommendations.

Clarifications to the standard: Discussed if the standard should include bassinet mattresses. Previous ballot was to rename to infant mattresses. Other changes include ad hoc harmonization. Task group will continue work and get to ballot soon.

Old business

“Mattresses in a box” were briefly discussed, and will be taken up with the compression discussions.

F15.18 Bassinets & Cradles: Tuere Williams, Jill Jenkins (EC)

Ballots

F19-09, Item 5

Negative was found persuasive. Will revise and reballot.

F19-09, Item 6 (lids)

One manufacturer was adamant that the product needs a lid. Argument is that the lid is integral to shipping. Others are very insistent against a lid. Non-persuasive motion was made, but failed. Therefore, item will be withdrawn and reballotted to allow a lid with strong warning.

Task groups

Baby box – Water repellency requirement/coating test. Looking at AATCC TM22 method, which basically uses a showerhead at a 45 degree angle. 80 is considered water repellent.

Compact Bassinet – Reviewed the revised proposal after the revisions related to the last ballot negatives.

Ad hoc warnings – Will take the latest ad hoc and incorporate into a ballot.

Old business

Still need ballot for 1.5 inch total thickness

Warnings on baby boxes... still in process. Still has one unresolved negative (from Sam). Found non-persuasive.

New business

Discussed other outstanding ballots. Chair confirmed that everything that is going on is happening now (boxes – lids reballot, warnings non-persuasive; compact – reballot, ad hoc – one more task group then ballot, 1.5 inch – out to ballot).

F15.18 Play Yards & Non-Full-Size Cribs Phone: Tuere Williams, Jill Jenkins (EC), Steve Harsanyi

Ballot

19-09 item 4 – Passed but held be an administrative negative.

Task group

Fit & Thickness – Task group is developing a proposal to allow up to a 2" mattress with no more than $\frac{1}{4}$ gap around the play yard. Measurement is from vertical mesh side and edge of filling. European standard only requires that the hard base be $\frac{1}{4}$ " from wall, but no gap requirement for mattress. The task group still needs to define exactly how measurements are taken. The subcommittee discussed how large the gap that should be allowed ($\frac{1}{4}$ " or $\frac{1}{2}$ "). Straw vote was affirmative for $\frac{1}{2}$ " gap.

Memory foam has been discussed by task group, with the concern that this foam is specifically made to conform to a body, therefore, it could confirm to infants face. Also, it is against AAP recommendations.

Task group to continue work.

Entrapment in accessories (5.15) – task group will try to clarify when/how to test in relate to accessory and if bassinet is below but accessories can be put on play yard frame. Task group will continue to work on this.

Hybrid scope interpretation – Task group met to discuss hybrid products (mesh and wood framed). Due to lack of products on the market, the topic will go on to memory sheet.

Discussed recent reports regarding prone positioning. Subcommittee will continue to work on addressing this issue.

Old business

PL112-28 update – approved by Commission. Effective January 20, 2020

Incident data review – not a lot of specific information for any of the new incidents, so no work action from this.