

U.S. CONSUMER PRODUCT SAFETY COMMISSION  
LOG OF MEETING

SUBJECT: Commissioners Feldman and Dziak held a teleconference with representatives of BabyBjörn

DATE OF MEETING: May 29, 2024

LOG ENTRY SOURCE: COPF Staff

LOCATION: Teleconference

CPSC ATTENDEE(S): Commissioner Feldman, Commissioner Dziak, Henry Kerner, Thomas Fuller, and John Mitchell

NON-CPSC ATTENDEES: Hanna Frisk Garlin (Global Product Safety and Compliance Manager, BabyBjörn), Jed Whitters (General Manager North America, BabyBjörn), Matt Howsare (Partner, Cooley LLP), Mark Brandenburg, MD (Senior Medical Director, Oklahoma Health Care Authority), Matthew Maltese (Senior Scientist, MRM Analysis LLC), and Mayra Thomas-Romero.

SUMMARY OF MEETING: Commissioners Feldman and Dziak held a teleconference with representatives of BabyBjörn to discuss the proposed rule for infant and infant/toddler rockers.

MATERIALS RECEIVED AT THE MEETING: BabyBjörn provided short bios and other information, which are attached.

# BabyBjörn

Founded in 1961 by Björn Jacobson, with a mission to simplify everyday life for families with small children. First product was the baby bouncer. Building on their own families experience they developed more products. The first carrier was launched in 1973. The company is still a family-owned business. Always putting the needs of families first.



We develop safe and well-designed quality products that meet the needs of families with small children. We build our brand and our product on five pillars: Safe, Caring, Trusted, Enjoyable, Inclusive and Simplicity.

Safety is at the core of what we do. Since are products are made for the most precious beings in the world, we aim to go beyond what is required under product compliance and standards. Safety is our top priority throughout the entire design and development process.

BabyBjörn products are sold in 55+ countries globally. Headquarter in Stockholm, Sweden. Regional head quarters in New York, Tokyo and Seoul. Sales turnover in 2023 approx. 110M USD.

Current product categories:



BABY BOUNCERS



BABY CARRIERS



SLEEP



BATHROOM



KITCHEN

# MARK BRANDENBURG, MD, MSC

Dr. Brandenburg is a physician and epidemiologist who has practiced emergency medicine for over 30 years. He is Senior Medical Director of the Oklahoma Health Care Authority (Oklahoma's Medicaid Agency) and Clinical Assistant Professor at University of Missouri Kansas City where he works in the Truman Medical Center Level I Trauma Center teaching residents and medical students.

Dr. Brandenburg has published over 20 peer-reviewed medical papers and two parenting books on child injury prevention. He currently serves as Review Editor for Frontiers Journal in Public Health.



# HANNA FRISK GÅRLIN

Hanna is the Global Product Safety & Compliance Manager at BabyBjörn and has been with the company since 2017. She has a background as a chemical engineer and has been working within product safety of juvenile products for the past 17 years. Hanna is active in standard development and is currently the Chair of the Swedish Technical Committee for EU standardisation of child use & care articles.



# MATT HOWSARE

Matt is the chair of Cooley's North American product safety practice and a leading global consumer product safety and compliance lawyer who counsels manufacturers, retailers, distributors, trade associations and consumer product companies on issues within all aspects of a product's life cycle. From preventative counseling incorporated before a product launch, to manufacturing and defect management, and recall strategies and governmental compliance adherence, Matt's experience spans the most challenging product related issues faced by companies around the world.



# MATTHEW MALTESE, Ph.D

Dr. Maltese began his career as a federal researcher focused on injury biomechanics especially pertaining to children, and then continued his research in faculty positions at the Children's Hospital of Philadelphia (CHOP) and the University of Pennsylvania Perelman School of Medicine. He has published 60+ scientific articles and 2 book chapters on injury biomechanics. Presently, he is co-founder of a MedTech spinout from CHOP, is a consultant to government and industry on pediatric injury, and teaches a course in Bioengineering at the University of Pennsylvania.





# JED WHITTERS

Jed Whitters is currently the General Manager for BabyBjörn North America and has been with BabyBjörn since 2018. Jed has worked in the Juvenile Products industry for the past 20 years in Sales and Leadership and has served on the JPMA Board of Directors. Jed is currently raising his family of 3 including his new 6-month-old daughter in Connecticut.





Rocking  
Reclined  
Posture

Reclined infant posture  
promotes ...

... object Interaction.  
Soska & Adolph (2014)  
Schneider et al (2021)

... parental Interaction.  
Fogel et al (1999)  
Rocha et al (2020)

... infant development.  
American Academy of Pediatrics  
Comments to Rocker NPR (2023)

# Why are options important?

Rocking mitigates crying...  
Campos (1994)  
Bryne & Horowitz (1981)



... and excessive crying ..

... harms parental mental  
health.  
Petzoldt et al (2018)  
Georg et al (2021)  
Barr et al (2006)  
Reigneveld et al (2004)  
Arneitz et al (2024)

... is linked to delayed child  
development.  
Rao et al (2004)  
Wolke et al (2009)



A close-up photograph of a woman with dark hair and a gold hoop earring, smiling and holding a baby in a grey and white striped BabyBjörn carrier. The baby is wearing a white long-sleeved shirt and has their hands near their face. The background is softly blurred, showing a window with bright light. The text is overlaid in a white serif font.

29<sup>th</sup> of May 2024  
Meeting regarding NPR Infant  
& Infant/Toddler Rockers

BabyBjörn

# Agenda

- Infant crying & the effects on caregivers
- Benefits of rockers
- Addressability of Fatalities/Injuries
- Introducing new requirements- benefits vs risk

# Meeting Notes

- Rockers provide essential benefits to infants, including to infants below 4 months of age. This is supported by scientific literature (Infographic in next slide).
- BabyBjörn does not believe the CPSC should impose a limitation in marketing or sales of rockers in terms of minimum age.
- Harm can be done if new requirements are introduced without a holistic analysis of benefit vs risk for negative consequences. Setting a minimum age restriction will likely have negative impact on overall safety and well being of the youngest infants.
- In AAP's comment letter to the NPR for Infant & Infant/Toddler rockers, for question J, AAP replies "*The AAP believes that the concavity and firmness requirements included in the NPRM would address the sleep-related death risk concerns regarding rockers with an incline "greater than 10 degrees". Accordingly, at this time, the AAP does not believe any modifications to the proposed rule are necessary.*"
- BabyBjörn encourages further work into concavity, firmness and torso angle requirements before introducing these requirements in a final rule. Further consideration to strike the right balance on pass/fail criteria is recommended not to restrict products that are safe, or to unintentionally increasing misuse, such as for example adding more bedding. It is also recommended test methods are specified further.
- Concavity, firmness and torso angle could potentially, after consideration in above point, be used to distinguish between toddler rockers and infant rockers in order to address the difference in vulnerability in regards to breathing of these two age groups.



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