



United States

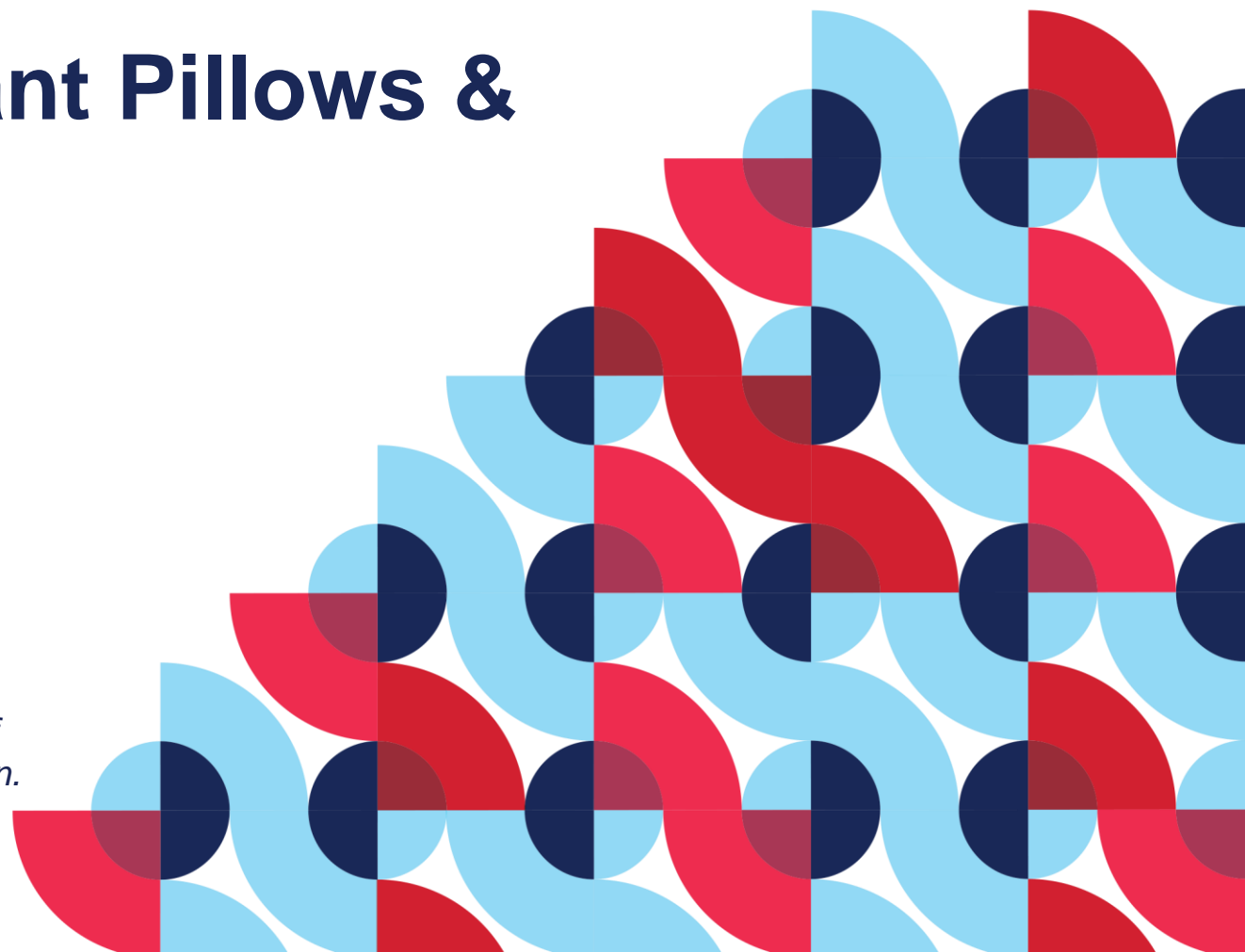
Consumer Product Safety Commission

Requirements for Infant Pillows & Cushions

March 13, 2025

Stephen Lee

Disclaimer: This presentation was prepared by CPSC Staff and may not necessarily reflect the views of the Commission.



Agenda

- Infant pillow ban
- Nursing pillows
- Infant support cushions
- Infant sleep products
- Other applicable requirements
- Q & A

Infant pillow ban



- Scope of the ban

16 CFR §
1500.18(a)(16)



What is covered under this ban?

- An infant cushion, infant pillow, or similar product that meets all of the following:
 - Has a flexible fabric covering
 - Is loosely filled with a granular material (e.g., polystyrene beads)
 - Is easily flattened
 - Is capable of conforming to the body or face of an infant
 - Is intended or promoted for use by children under 1 year of age
- Exemption for nursing pillows designed to be used only as a nursing aide, 16 CFR § 1500.86(a)(9)



Nursing Pillows

- Definition
- General requirements
- Performance requirements
- Warning label

16 CFR part 1242
89 FR 85388

What is a nursing pillow?

- Any product intended, marketed, or designed to position and support an infant close to a caregiver's body while breastfeeding or bottle feeding, including any removable covers, or slipcovers, sold on or together with such a product
 - Can rest upon, wrap around, or be worn by the caregiver in a seated or reclined position
- Does not include maternity pillows, sling carriers, and soft infant or toddler carriers



General Requirements

- Lead in paint
- Small parts
- Hazardous sharp edges or points
- Removal of components
- Permanency of labels and warnings



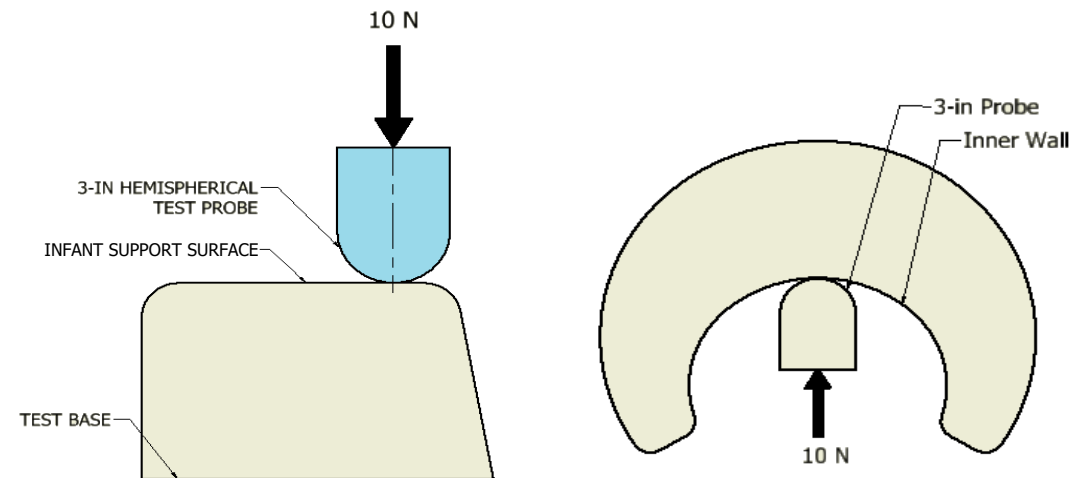
Performance Requirements

- Firmness
- Infant containment (limitation)
- Infant restraints (prohibition)
- Seam strength
- Caregiver attachment strength

Performance Requirements

- Firmness
- Infant containment (limitation)
- Infant restraints (prohibition)
- Seam strength
- Caregiver attachment strength

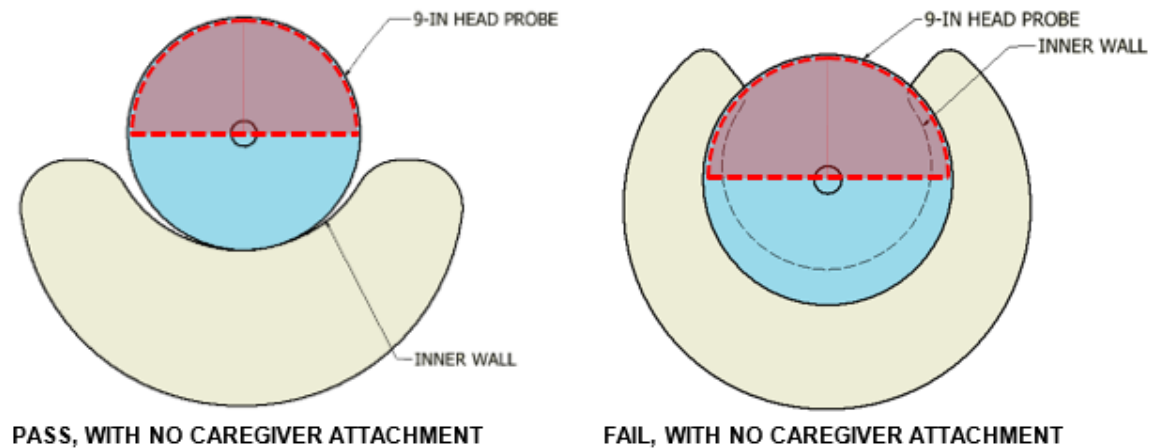
Force to displace 1 in. into the infant support surface and inner wall using the 3-in. head probe must exceed 10.0 N



Performance Requirements

- Firmness
- Infant containment (limitation)
- Infant restraints (prohibition)
- Seam strength
- Caregiver attachment strength

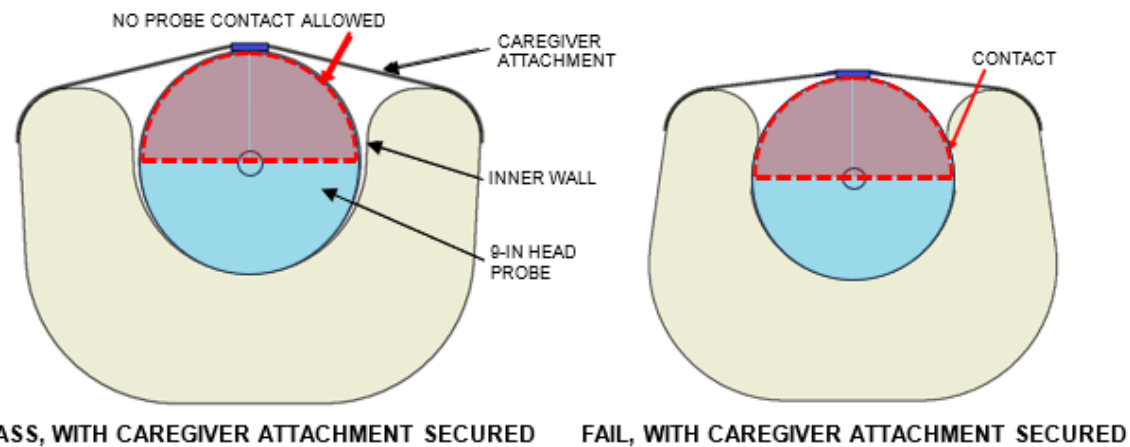
9-inch head probe must extend beyond opening of the product, and outer half of the probe cannot contact inner wall of the opening



Performance Requirements

- Firmness
- Infant containment (limitation)
- Infant restraints (prohibition)
- Seam strength
- Caregiver attachment strength

9-inch head probe must extend beyond opening of the product, and outer half of the probe cannot contact inner wall of the opening





Performance Requirements

- Firmness
- Infant containment (limitation)
- **Infant restraints (prohibition)**
- Seam strength
- Caregiver attachment strength

Nursing pillows are prohibited from having infant restraints.



Performance Requirements

- Firmness
- Infant containment (limitation)
- Infant restraints (prohibition)
- **Seam strength**
- Caregiver attachment strength

Seams must withstand 15 lbs. of force applied evenly over 5 seconds and maintained for an additional 10 seconds



Performance Requirements

- Firmness
- Infant containment (limitation)
- Infant restraints (prohibition)
- Seam strength
- Caregiver attachment strength

Attachment components and points of attachment must bear 20 lbs. of force applied evenly over 5 seconds and maintained for an additional 10 seconds



Warning Label

⚠️ WARNING

BABIES HAVE DIED USING NURSING PILLOWS FOR SLEEP OR LOUNGING

Babies can move without warning and **CAN SUFFOCATE** within minutes if their airway is blocked.

- **Only use this product to feed baby.** Move baby to an infant sleep product, like a crib or bassinet, if baby falls asleep or if you feel drowsy.
- Never leave or prop up baby alone on this product.
- Never place this product where baby sleeps.

Babies have been injured from FALLS.

- Do not use to prop up baby on beds, sofas, or other raised surfaces.
- Do not use to carry baby.



Infant Support Cushion



- Definition
- General requirements
- Performance requirements
- Warning label



16 CFR part 1243
89 FR 87467



What is an infant support cushion?

- An infant product that is filled with or comprised of resilient material and is marketed, designed, or intended to support an infant's weight or any portion of an infant while reclining or in a supine, prone, or recumbent position, including any removable covers, or slipcovers, sold on or together with such a product
- Excludes other durable infant or toddler products (except nursing pillows that can also be infant support cushion)



General Requirements

- Hazardous sharp edges or points
- Small parts
- Lead in paint
- Toys
- Removal of components
- Permanency of labels and warnings
- Convertible products



Performance Requirements

- Restraint (prohibition)
- Seam strength
- Bounded openings
- Maximum incline angle
- Firmness
- Sidewall angle



Performance Requirements

- Restraint (prohibition)
- Seam strength
- Bounded openings
- Maximum incline angle
- Firmness
- Sidewall angle

Infant support cushions are prohibited from having restraints



Performance Requirements

- Restraint (prohibition)
 - Seam strength
 - Bounded openings
 - Maximum incline angle
 - Firmness
 - Sidewall angle
- Seams must withstand 15 lbs. of force applied evenly over 5 seconds and maintained for an additional 10 seconds

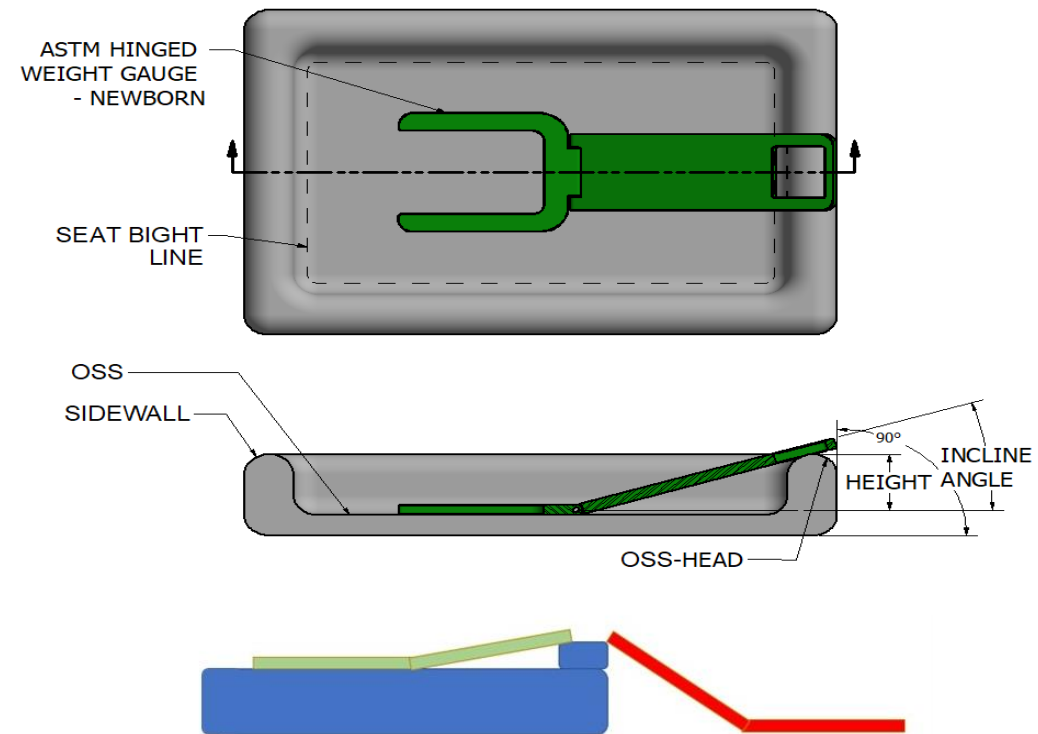
Performance Requirements

- Restraint (prohibition)
 - Seam strength
 - Bounded openings
 - Maximum incline angle
 - Firmness
 - Sidewall angle
- Bounded openings that allow the passage of the small head probe must also allow passage of the large head probe

Performance Requirements

- Restraint (prohibition)
- Seam strength
- Bounded openings
- **Maximum incline angle**
- Firmness
- Sidewall angle

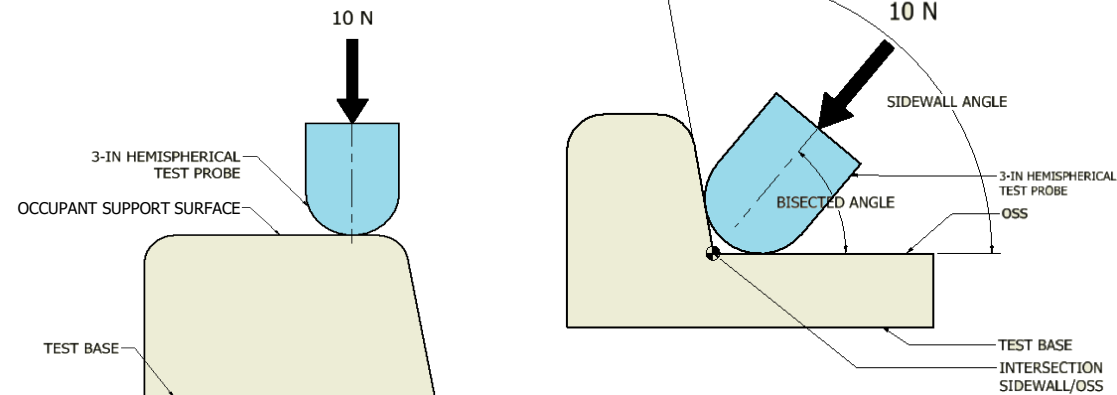
Incline angle must not exceed 10°



Performance Requirements

- Restraint (prohibition)
- Seam strength
- Bounded openings
- Maximum incline angle
- Firmness
- Sidewall angle

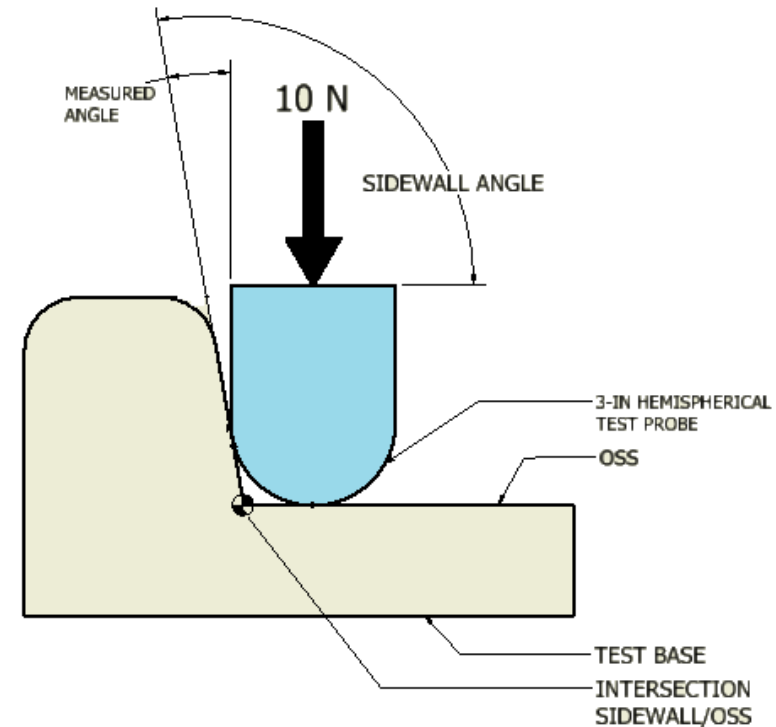
Force to displace 1 in. into occupant support surface (OSS), sidewall, and intersection of sidewall and OSS using the 3-in. head probe must exceed 10.0 N



Performance Requirements

- Restraint (prohibition)
- Seam strength
- Bounded openings
- Maximum incline angle
- Firmness
- Sidewall angle

Sidewall angle must exceed 90°



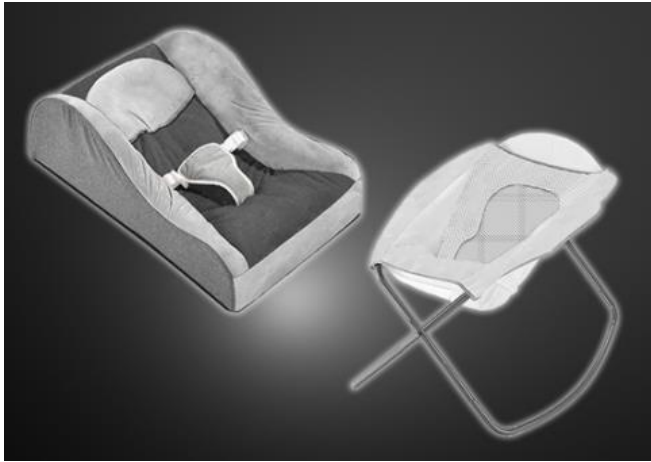
Warning Label

Warning for product w/o tummy time

⚠️ WARNING
<p>USING THIS PRODUCT FOR SLEEP OR NAPS CAN KILL. Babies can turn over or roll out without warning and CAN SUFFOCATE in only a few minutes.</p> <ul style="list-style-type: none">• Only use on the floor with baby on back, face-up.• Stay near and watch baby during use.• Do not use on soft surfaces or in sleep products like cribs or bassinets. Keep blankets and other soft items out of and away from product.• If baby falls asleep, move baby to infant sleep product, such as a crib or bassinet.
<p>Babies have been injured from FALLS.</p> <ul style="list-style-type: none">• Do not use on beds, sofas, or other raised surfaces.• Never carry or move product with baby in it.

Warning for tummy time product

⚠️ WARNING
<p>USING THIS PRODUCT FOR SLEEP OR NAPS CAN KILL. Babies can turn over or roll out without warning and CAN SUFFOCATE in only a few minutes.</p> <ul style="list-style-type: none">• Use on the floor with baby on back, face-up. Put baby on back after Tummy Time.• Stay near and watch baby during use.• Do not use on soft surfaces or in sleep products like cribs or bassinets. Keep blankets and other soft items out of and away from product.• If baby falls asleep, move baby to infant sleep product, such as a crib or bassinet.
<p>Babies have been injured from FALLS.</p> <ul style="list-style-type: none">• Do not use on beds, sofas, or other raised surfaces.• Never carry or move product with baby in it.



Infant Sleep Product

- Definition
- General Requirements
- Performance Requirements

16 CFR part 1236



What is an infant sleep product?

- Product marketed or intended to provide a sleeping accommodation for an infant up to 5 months of age and that is not already covered under any of the following:
 - Bassinets and Cradles
 - Full-Size Baby Cribs
 - Non-Full-Size Baby Cribs
 - Safety Standard for Play Yards
 - Safety Standard for Bedside Sleepers



Overview of Requirements

- Must meet requirements for bassinets and cradles per 16 CFR part 1218
- Includes meeting the definition of a bassinet/cradle
 - Small bed designed primarily to provide sleeping accommodations for infants, supported by free standing legs, a stationary frame/stand, a wheeled base, a rocking base, or which can swing relative to a stationary base
- Must not have a seat back or sleep surface angle exceeding 10°



General Requirements

- Lead in paint
- Hazardous sharp edges or points
- Small parts
- Wood parts
- Scissoring, shearing, and pinching
- Unintentional folding
- Openings
- Labeling
- Fasteners
- Corner posts
- Toys
- Bassinet/cradle accessory to play yard/non-full-sized crib
- Occupant restraint system

Performance Requirements

- Spacing of rigid sided bassinet/cradle components
- Openings for mesh/fabric sided bassinet/cradle
- Static load
- Stability
- Sleeping pad
- Protective components
- Bassinets with segmented mattresses: flatness test
- Fabric sided enclosed openings
- Rock/swing angle
- Removable bassinet bed attachment



Warning Label

⚠ WARNING

Failure to follow these warnings and the instructions could result in serious injury or death.

FALL HAZARD – To help prevent falls, do not use this product when the infant begins to push up on hands and knees or has reached [*manufacturer's recommend maximum weight*], whichever comes first.

SUFFOCATION HAZARD – Infants have suffocated:

- In gaps between extra padding and side of the bassinet/cradle, and
- On soft bedding.

Use only the pad provided by the manufacturer. NEVER add a pillow, comforter, or another mattress for padding.

⚠ WARNING

If a sheet is used with the pad, use only the one provided by the bassinet or cradle manufacturer or one specifically designed to fit the dimension of the bassinet or cradle mattress.



**PRODUCT REGISTRATION FOR
SAFETY ALERT OR RECALL ONLY**

We will use the information provided on this card to contact you only if there is a safety alert or recall for this product. We will not sell, rent, or share your personal information. To register your product, please complete and mail the bottom part of this card, or visit our online registration at: www.website.com.

|||||

BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. _____
POSTAGE WILL BE PAID BY ADDRESSEE

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

Manufacturer's Name
Post Office Box 0000
Anytown, ST 01234

Other Applicable Requirements

- Other Testing
- Tracking Label
- Product Labeling
- Registration Form
- Certification

15 USC § 2063(a)
16 CFR part 1130



Testing Requirements

- Third-party testing, 15 U.S.C. § 2063(a)(2)(A)
- Periodic testing, 16 CFR § 1107.21
- Small parts ban, 16 CFR part 1501
- Lead in paints and similar surface coatings, 16 CFR 1303
- Total lead content, 15 U.S.C. § 1278a
- Phthalates, 16 CFR part 1307



Product Labeling

- Tracking label
- Durable infant and toddler product labeling

	Requirements	Permanent Mark on Product	Permanent Mark on Packaging	Postage-Paid Product Registration Card
1)	Name of the manufacturer or private labeler	X	X	X
2)	Location (city/state) and date of manufacture	X	X	X
3)	Cohort information, such as a batch or run number	X	X	
4)	Manufacturer contact information (U.S. address and telephone number, toll-free if available)	X		X
5)	Model name and number	X		X



Registration Form

- Durable infant or toddler products must have a postage-paid card attached to the product
 - Must be in English
 - Each half sized at least 3½ x 5 x 0.007 inches, separated by perforation
- Firm must also have website (or email if no website is available) for electronic registration
- Business reply mail service provided by United States Postal Service (mssc@usps.gov)

Registration Form (cont.)



PRODUCT REGISTRATION FOR SAFETY ALERT OR RECALL ONLY

We will use the information provided on this card to contact you only if there is a safety alert or recall for this product. We will not sell, rent, or share your personal information. To register your product, please complete and mail the bottom part of this card, or visit our online registration at: www.website.com.



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL

FIRST-CLASS MAIL PERMIT NO.

POSTAGE WILL BE PAID BY ADDRESSEE



Manufacturer's Name
Post Office Box 0000
Anytown, ST 01234

Manufacturer's Contact Information

Manufacturer's Name • 111 Main St • Anytown, ST 01234
www.website.com
Phone Number - Toll-Free (if available)

Model Name:

Model Number:

Manufacture Date:

**KEEP THIS TOP PART FOR YOUR RECORDS.
FILL OUT AND RETURN BOTTOM PART.**

Name

Mailing Address

City

State

Zip Code

Telephone Number

E-mail address

Model Name:

Model Number:

Manufacture Date:



Certification

- Every domestic manufacturer or importer of a children's product must issue a Children's Product Certificate (CPC)
 - Importers must electronically file (www.cpsc.gov/eFiling) CPC data as of July 8, 2026 (January 8, 2027, for products entering US commerce from FTZ)
- No required template or format, illustrative examples of certificates available at www.cpsc.gov/CPC
 - Update to certificate elements, [90 FR 1800](#)



Certification (cont.)

- 1) Identification of the product
- 2) Citation to each safety rule
- 3) Identification of importer or domestic manufacturer
- 4) Contact information for individual maintaining test results
- 5) Date and place of manufacture
- 6) Date and place of testing
- 7) Identification of testing laboratory



Certification (cont.)

- | | |
|--|---|
| 1) Identification of the product | 16 CFR part 1242 – Nursing pillows |
| 2) Citation to each safety rule | 16 CFR part 1243 – Infant support cushions |
| 3) Identification of importer or domestic manufacturer | 16 CFR part 1236 – Infant sleep products |
| 4) Contact information for individual maintaining test results | |
| 5) Date and place of manufacture | 16 CFR part 1130 – Consumer registration of durable infant or toddler products |
| 6) Date and place of testing | 15 U.S.C. § 2063(a)(5)(A) – Tracking label |
| 7) Identification of testing laboratory | |

Contact us!

www.cpsc.gov/SBOContact

Phone: (888) 531-9070

Email: SBO@cpsc.gov

www.cpsc.gov/Email

Select "Business Education"



Regulatory Robot

<https://business.cpsc.gov/robot>



CPSC.gov     USCPSC



Business Guidance Library

www.cpsc.gov/GuidanceLibrary