

CONSUMER PRODUCTS

ORGANIZATIONAL SPECIFICS

Standards Organizations:	ASTM
Technical Committees:	ASTM F15
Other Partnering Organizations:	
Government Organizations:	U.S. Consumer Product Safety Commission (CPSC)
Industry Sector(s) / Technology:	Consumer Products
Program / Activity Website URL(s):	https://www.astm.org/get-involved/technical-committees/committee-F15 https://www.astm.org/get-involved/consumer-participation/consumer-safety-standards.html

STANDARDS DRIVEN PUBLIC-PRIVATE PARTNERSHIP (PPP) OBJECTIVES

PPP Drivers:

In 1972, the [U.S. Consumer Products Safety Commission \(CPSC\)](#) was created, through the [Consumer Product Safety Act](#), to protect the public from unreasonable risks of injury or death associated with the use of consumer products. The act directed the CPSC to defer to voluntary consensus standards and shortly after the establishment of the CPSC, the agency asked [ASTM International](#) to create a dedicated committee, [F15 Consumer Products](#), to develop standards. Since then, CPSC has relied on ASTM to deliver standards to help improve consumer product safety.

PPP Goals:

The Consumer Product Safety Commission (CPSC) can either initiate work in voluntary standards through rulemaking or through participation and requests for the creation of voluntary standards. One example of this public-private partnership occurred in 2008, when Congress passed the [Consumer Product Safety Improvement Act \(CPSIA\)](#), which required CPSC to promulgate consumer product safety standards for children's toys and [durable infant and toddler products](#) in over two dozen categories such as cribs, strollers, infant seats, and highchairs among others. The act also required that the CPSC address the standards at an accelerated rate of two standards every six months.

The language of the CPSIA mandated that the standards development process begin with the product categories that the CPSC determines to be of the highest priority. The list included in the Act identified many common juvenile products for which a weak standard or no previous technical standard existed at all.

Public Sector Role & Participation:

CPSC staff participates on ASTM's committee on consumer products ([F15](#)), along with industry and other stakeholders such as industry associations, manufacturers, testing laboratories, end users, consumers/consumer advocates, health professionals, product engineers, and regulatory agencies. CPSC staff are recognized members of the committee similar to other stakeholders, though CPSC staff participate in other ASTM technical subcommittees. These committees cover areas such as paint, packaging, soaps, textiles, sports equipment, tires, fences, and more. Over 70 CPSC staff work within ASTM committees overall, with much of their work dedicated to consumer products.

While a vote within the ASTM process is possible, CPSC staff must be granted permission to hold an official vote within a standards body under the requirements 16 CFR 1031. However, CPSC staff have access to and can provide comments on all ballots where they participate for consideration by the committees.

In some cases, the CPSC may make a request to ASTM International seeking a revision to an existing standard or the creation of a new standards activity targeting a hazard, new product, material, or process. One example includes standards developed to address entrapments with adult portable bed rails to mandate compliance with the voluntary

standard. Another example is the development of a voluntary standard for liquid laundry packets after exposures and ingestions caused a series of injuries and deaths.

Regardless of the hazard or request, CPSC staff participate as stakeholders in the standards-development process to revise standards or create new standards when injury and incident data signal a need for responsive standards through ASTM.

CPSC provides the consumer products committee with incident data, which is reported through various channels including the [NEISS database](#) and incident reports made directly to CPSC. This data helps identify trends and patterns in injuries and incidents that help inform the direction of standardization.

The work between ASTM and CPSC is further strengthened by the important role of the CPSC Voluntary Standards Development Coordinator, who works as a liaison between ASTM and CPSC, supervising standards activities.

ASTM committees are an open and neutral forum to engage with the regulatory community. The process is iterative and requires all parties to collaborate in order to come to consensus. The venue allows for discussion on common sense solutions that can be implemented in a timely manner. Dialogue is also important to ensure all comments and concerns are heard, with the process working best when stakeholders leverage perspectives from a variety of disciplines. ASTM's consensus-based process allows all stakeholders to contribute.

Implementation Methods:

Standards development work begins when a relevant stakeholder identifies the need for a new document or revision to an existing standard. CPSC will also initiate revisions or requests for new standards based on information received from the public and/or recalls to address various safety concerns.

The committee on consumer products publishes, maintains, and updates numerous standards that help to address the safety of pools, spas, and playgrounds; prevent strangulation by clothing drawstrings; reduce bunkbed and baby walker injuries; eliminate the toxicity of crayons and other art supplies; enhance the fire safety of candle products; and much more. Because ASTM standards are living documents, revisions can be made at any time when the need arises.

Measurement of Success:

Since the establishment of the consumer products committee, most of the CPSC work has been conducted under its auspices. Many ASTM standards are incorporated by reference into regulation. One example is the standard consumer safety specification for full-size baby cribs ([F1169](#)). The standard is regularly updated and has been a mandatory safety standard in the U.S. since 2011. According to CPSC data, there has been an 80% reduction in crib deaths from 1973 to 2018.

Other key documents F15 has produced include:

- [The standard consumer safety specification for highchairs \(F404\)](#)
- [The standard consumer safety specification for infant walkers \(F977\)](#)

Recall statistics in particular illustrate the effectiveness of the CPSIA and its impact on toy safety, according to consumer advocate Rachel Weintraub. "In 2007, there were 109 recalls of children's products and toys for lead," she says. "In 2017 there was one such recall for lead. I think that's a very powerful statistic." Toy recalls have also decreased according to Weintraub, declining from 207 in 2007 to 15 in 2017, an 89 percent reduction that may be attributed in part to the CPSIA.

F15 standards have and continue to play a preeminent role in reducing the number of injuries and death associated with the use and performance of consumer products based on identified hazards. The committee, with a current membership of 1423 participants on 63 technical subcommittees, has jurisdiction of over 100 standards.

Key Takeaways:

1. Updating a voluntary standard can be quicker than updating a government-developed standard or other regulatory action.
2. CPSC, like many government agencies, has been understaffed at various times. Using the PPP model, they are able to leverage additional technical expertise that did not exist within the commission.
3. All stakeholders must stay engaged and communicate.

Advice for Others:

ASTM and other SDOs are an open place to engage with the regulatory community. They foster dialogue among a diverse group of stakeholders to develop common-sense safety requirements.

An important consideration for a committee in its standards-development process is risk assessment versus performance.

In standards-development work, the ideal solution is when an issue can be engineered out. If a problem must remain, then finding a way to change or improve it is another solution. If all else fails, then a warning label should be added for the consumer's benefit.