

February 25, 2020

The Honorable Robert Adler, Acting Chairman  
The Honorable Elliot Kaye, Commissioner  
The Honorable Dana Baiocco, Commissioner  
The Honorable Peter Feldman, Commissioner  
U.S. Consumer Product Safety Commission  
4330 East West Highway  
Bethesda, Maryland 20814

Re: CPSC-2019-0033, “CPSC Forum on Crib Bumpers”

Dear Acting Chairman Adler and Commissioners Kaye, Baiocco, and Feldman:

As 91 national and state medical, public health, and consumer organizations dedicated to children’s health and safety, we write to urge the U.S. Consumer Product Safety Commission (CPSC) to remove hazardous crib bumper products from the market. We appreciate the CPSC’s consideration of this important issue and are grateful for the opportunity to comment.

Crib bumpers are dangerous products that have no place in a safe sleep environment. They are inconsistent with expert safe sleep recommendations, which advise placing babies alone, on their back, and on a flat, firm surface with no restraints or loose fabric nearby. Given current safety standards for crib slat distance, crib bumper products are not necessary to prevent head entrapment, and they can lead to suffocation when an infant’s face is pressed against the side of the crib.<sup>1,2</sup> Bumper pads have led to dozens of infant suffocation deaths and do not offer protection to babies. Maryland; Ohio; New York State; Chicago, Illinois; and Watchung, New Jersey have taken action to ban these products in their jurisdictions. More research is needed to verify the safety of mesh crib liners, as the risks of suffocation may outweigh any benefits.

The safest sleep environment for an infant is a crib, bassinet, portable crib, or play yard that conforms to CPSC standards and is free of soft objects, loose bedding, and crib bumpers. We are concerned that the current lack of action from the CPSC to remove deadly crib bumpers from the marketplace leads consumers to assume these products are safe, when in fact they pose the risk of infant fatality. The adoption of a rule allowing any padded bumpers would reduce safety by removing protections in states and cities that currently ban these products and by sending a dangerous message to parents encouraging them to use these risky products.

We strongly urge the CPSC to remove all crib bumpers and liners from the market. Due to the unique vulnerabilities of infants, the CPSC has a crucial role in protecting families from the risk of an infant sleep-related fatality in a dangerous product.

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<sup>1</sup> Thach BT, Rutherford GW Jr, Harris K. Deaths and injuries attributed to infant crib bumper pads. *J Pediatr.* 2007;151(3):271–274, 274.e1–274.e3. pmid:17719936

<sup>2</sup> Scheers NJ, Woodard DW, Thach BT. Crib bumpers continue to cause infant deaths: a need for a new preventive approach. *J Pediatr.* 2016;169:93–97, e91. pmid:26621044

If you have further questions, you may reach out to Zach Laris with the American Academy of Pediatrics at [zlaris@aap.org](mailto:zlaris@aap.org). Thank you for your consideration.

Sincerely,

**National Organizations:**

American Academy of Pediatrics  
Association of Maternal & Child Health Programs  
Child Care Aware® of America  
Children's Advocacy Institute  
Consumer Federation of America  
Consumer Reports  
Cribs for Kids  
Empire State Consumer Project  
First Focus Campaign for Children  
Keeping Babies Safe  
Kids In Danger  
MomsRising  
National Association of Pediatric Nurse Practitioners  
Ounce of Prevention Fund  
Parents for Window Blind Safety  
Safe States Alliance  
U.S. Public Interest Research Group

**State and Local Organizations:**

AKPIRG  
American Academy of Pediatrics - Arizona Chapter  
American Academy of Pediatrics - California Chapter 3  
American Academy of Pediatrics - Hawaii Chapter  
American Academy of Pediatrics Georgia Chapter  
American Academy of Pediatrics New York Chapter 1  
American Academy of Pediatrics New York Chapter 2  
American Academy of Pediatrics New York Chapter 3  
American Academy of Pediatrics, Colorado Chapter  
American Academy of Pediatrics, Orange County Chapter  
American Academy of Pediatrics, Rhode Island Chapter  
American Academy of Pediatrics, Utah Chapter  
American Family Children's Hospital  
Ann & Robert H. Lurie Children's Hospital of Chicago  
Arizona PIRG  
Arkansas Chapter, American Academy of Pediatrics  
California Chapter 1, American Academy of Pediatrics

CalPIRG  
Children's Health Alliance of Wisconsin  
Colorado PIRG  
ConnPIRG  
Delaware Chapter of the American Academy of Pediatrics  
Empire State Consumer Project, Inc.  
Florida Chapter - American Academy of Pediatrics  
Florida PIRG  
Georgia PIRG  
Idaho Chapter of the American Academy of Pediatrics  
Illinois Action for Children  
Illinois Chapter, American Academy of Pediatrics  
Illinois PIRG  
Indiana Chapter of the American Academy of Pediatrics  
Iowa Chapter of the American Academy of Pediatrics  
Iowa PIRG  
Kansas Chapter, American Academy of Pediatrics  
Kentucky Chapter of the American Academy of Pediatrics  
Louisiana Chapter of the American Academy of Pediatrics  
Maine Chapter, American Academy of Pediatrics  
Maryland Chapter, American Academy of Pediatrics  
Maryland PIRG  
Massachusetts Chapter of the American Academy of Pediatrics  
MassPIRG  
Michigan Chapter American Academy of Pediatrics  
Minnesota Chapter of the American Academy of Pediatrics  
Missouri Chapter of the American Academy of Pediatrics  
Missouri PIRG  
NC PIRG  
Nevada Chapter of the American Academy of Pediatrics  
New Hampshire PIRG  
New Mexico PIRG  
NJ PIRG  
North Carolina Pediatric Society  
North Dakota Chapter of the American Academy of Pediatrics  
Ohio PIRG  
Oklahoma Chapter of the American Academy of Pediatrics  
OSPIRG  
PennPIRG  
Pennsylvania Chapter of the American Academy of Pediatrics  
PIRGIM (PIRG in Michigan)  
Rhode Island PIRG  
South Carolina Chapter of the American Academy of Pediatrics  
Sudden Infant Death Services of Illinois, Inc.

Tennessee Chapter of the American Academy of Pediatrics  
Texas Pediatric Society  
Texas PIRG  
The Consumer Assistance Council, Inc.  
UW Health  
Virginia Chapter, American Academy of Pediatrics  
WashPIRG  
West Virginia Chapter of the American Academy of Pediatrics  
Wisconsin Chapter American Academy of Pediatrics and WIAAP Foundation  
Wisconsin PIRG  
Wyoming Chapter of the American Academy of Family Physicians  
Wyoming Chapter of the American Academy of Pediatrics  
Wyoming Medical Society