

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.^{1,2} 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.

¹ 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

² 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. 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