

CPSC Clothing Storage Units Rule

Kitchen Cabinet Manufacturers Association

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Agenda

Background

- STURDY Act
- CPSC's Adoption of ASTM Standard

New Rule Details

- Definition of CSU
- Rule Requirements

Key Considerations

- Staying out of scope of the rule

Additional Material

- Contract language
- Website language

Problem to Be Solved

CPSC aware of numerous deaths and injuries resulting from CSUs tipping over



A number of tip-over accidents involve children 3 years old or younger



Accidents result from child climbing the CSU

A close-up photograph of a person's hands in a professional setting. The left hand is resting on a large stack of papers, while the right hand holds a silver pen. The papers are organized with various colored folders and clips. A blue rectangular box with a thin black border is centered over the image, containing the text 'Regulatory Background' in white, bold, sans-serif font. The background is blurred, showing a person in a dark suit.

Regulatory Background

Background

November
2022

- CPSC promulgated a final CSU rule

December
2022

- Congress passed STURDY Act

April 2023

- CPSC adopts ASTM standard that supersedes Nov. 2022 rule

STURDY Criteria for Voluntary Standards

Voluntary standard must protect children from tip-over-related death or injury with:

Tests (i.e., simulating children's weight; real world use of CSU; CSU itself)

Warning requirements

CPSC Identifies Voluntary Standard

ASTM F2057-23

Standard Safety Specification
for Clothing Storage Units

A person wearing a blue shirt is using a magnifying glass to inspect a document. The document contains a table with several rows and columns. The background is a blurred office setting with large windows.

Specifics of the CSU Rule

CPSC's New Rule

What:

- New mandatory product safety standard that adopts ASTM F2057-23; 16 CFR 1261

Purpose:

- Addresses tip-over related accidents and fatalities associated with clothing storage units (CSUs)

Effective date:

- September 1, 2023

Covered items:

- CSUs manufactured after the effective date

“Clothing Storage Unit” Defined

STURDY Act Definition

- “any free-standing furniture item manufactured in the U.S. or imported for use in the U.S. that is *intended* for the storage of clothing, typical of bedroom furniture.”

ASTM Definition

- “a furniture item with drawers and/or hinged doors intended for the storage of clothing typical with bedroom furniture.”

CSUs Covered by the Rule

Standard applies to CSUs which:

- Are free-standing
- Are 27 inches or greater in height,
- Weigh 30 pounds or greater in mass, and
- Contain 3.2 cubic feet or greater of enclosed storage.

Free-standing CSUs include, but are not limited to:

- chests
- chests of drawers
- drawer chests
- armoires
- chifforobes
- bureaus
- door chests
- dressers

Standard does not apply to shelving units, such as:

- bookcases or entertainment furniture
- office furniture
- dining room furniture
- jewelry armoires
- underbed drawer storage units
- occasional/accent furniture not intended for bedroom use
- laundry storage/sorting units
- built-in units intended to be permanently attached to the building

CSUs: Kitchen Cabinets

Not CSUs

- Not intended for storage of clothing
- Not designed to be free-standing

What are the rule's requirements?



CSUs must be tested in line with ASTM testing requirements



Anti-tip device must be included with each item of furniture covered by the rule



Interlocking devices, if used, must meet certain specifications



Permanent warning labels



Key Considerations

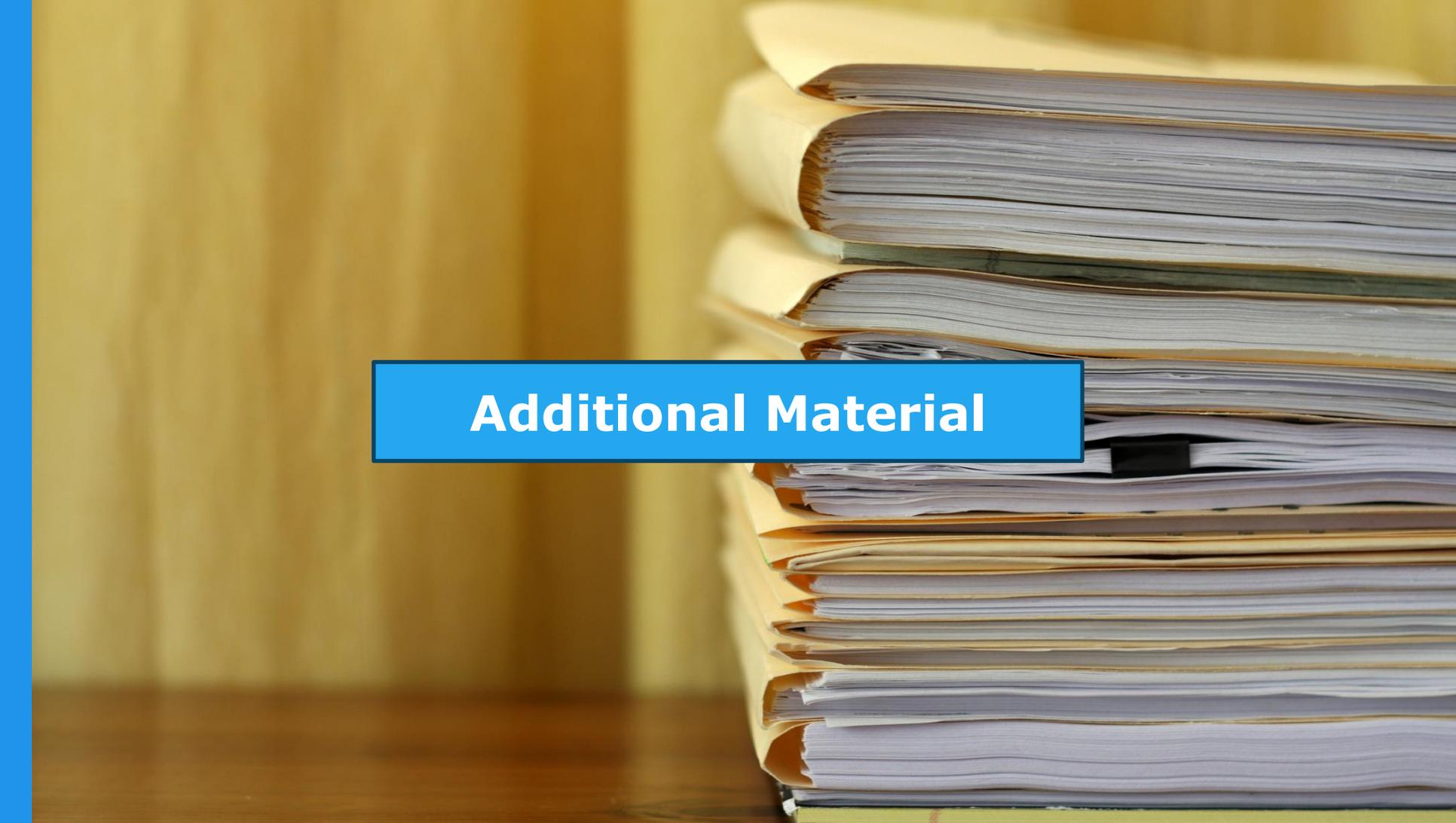
Staying out of scope

Manufacture units not intended for the storage of clothing, typical of bedroom furniture

Manufacture out-of-scope units (e.g., built-in units, bookcases, office furniture)

Communicate to designers the intent of the product (e.g., kitchen cabinets)

Advertise limited scope of products in catalogues and company website

A stack of papers and folders is shown on a wooden surface. The papers are white and the folders are light brown. A blue rectangular box with a thin black border is overlaid on the stack, containing the text "Additional Material" in white, bold, sans-serif font. The background is a blurred wooden surface.

Additional Material

Sample Website Language

“We manufacture [kitchen] cabinets for [permanent] installation on walls or underneath counter tops.”

“[Kitchen and bathroom] cabinets designed to safely store products intended for both uses.”

“We offer a variety of built-in cabinets for kitchens and bathrooms.”

Sample Contract Language

“The purchased [kitchen/bathroom] cabinets are intended for the installation in a [kitchen/bathroom]. The purchased cabinets are designed to store [kitchen dishes, glassware, dry food products, utensils and other kitchen and bathroom items].”

“Products sold by [Seller/Manufacturer] must be permanently affixed to a wall or building to function properly and in accordance with design specifications.”

“All cabinets sold by [Business Name/Seller] are designed and sold for use only in kitchens, and/or bathrooms. Buyer is responsible for compliance obligations associated with any modified uses of cabinets.”

Thank You!



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