



United States

Consumer Product Safety Commission

Requirements for Clothing Storage Units (CSUs)

Webinar

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Presented by: CPSC staff

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



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Overview

- Background
 - Implementation of STURDY
 - Scope of CSU rule
- Requirements & Compliance
 - CSU requirements
 - Other applicable requirements
 - Enforcement
- Test Procedure
- Warning
- Q & A



Implementation of STURDY

- STURDY (15 U.S.C. § 2056f) was enacted in December 2022 and directed CPSC to promulgate rulemaking for CSUs
- CPSC voted to accept ASTM F2057-23 as the safety standard for clothing storage units without edits
 - Adoption of ASTM F2057-23 supersedes CPSC's previous rule at [87 FR 72598](#), see [88 FR 28403](#)
- Regulation codified at 16 CFR part 1261
- Applies to products manufactured after September 1, 2023

What CSUs are subject to 16 CFR part 1261?



- CSU definition at ASTM F2057-23 section 3.1.3:
 - “furniture item with drawers and/or hinged doors intended for the storage of clothing typical with bedroom furniture”
- Free-standing, height of at least 27 in., mass of at least 30 lb., enclosed storage volume of at least 3.2 ft³
- Consumer product definition at 15 U.S.C. § 2052(a)(3)(ii):
 - “for the personal use, consumption or enjoyment of a consumer in or around a permanent or temporary household or residence, a school, in recreation, or otherwise”

CSU Examples



- In scope:
 - Chests, chests of drawers, drawer chests, armoires, chifferobes, bureaus, door chests, dressers
- Out of scope:
 - Bookcases, entertainment furniture, office furniture, dining room furniture, jewelry armoires, underbed drawer storage units, occasional/accent furniture not intended for bedroom uses, laundry storage/sorting units, built-in units, clothing storage chests as defined in ASTM F2598

Q: Are removable totes considered an “extendible element”?

No.

The definition of an extendible element at section 3.1.6 of ASTM F2057-23 specifically excludes bins. Totes would similarly be considered excluded from this definition.

Q: Can storage behind doors be considered an “extendible element”?

Yes.

Pull-out or sliding shelves are an example of an extendible element that could be behind doors.

Q: Are CSUs with casters (wheels) subject to 16 CFR part 1261?

Yes.

Casters are not a criteria to determine whether the product is within scope.

Overview of Regulatory Requirements



- Clothing Storage Unit Requirements
- Lead in Paint
- General Use vs. Children's Products
- Additional Requirements for Children's Products
- Certification

ASTM F2057-23 Mandatory Safety Standard Requirements



- Anti-Tip Device
- Requirements for Interlocks
- Stability Tests
 - Simulated Clothing Load
 - Simulated Horizontal Dynamic Force
 - Simulating a Reaction on Carpet with Child Weight
- Warning

Additional Requirements - Lead in Paint



- Must not contain a concentration of lead greater than 0.009 percent (90 parts per million) in paint or any similar surface coatings.
 - Certification to 16 CFR part 1303 - Lead in Paint
- Exemption: Metal furniture articles (but not metal children's furniture) bearing factory-applied (lead) coatings are exempt from the regulation and require no cautionary labeling
 - 16 CFR § 1303.3(c)

General Use vs Children's Products



- A “children's product” is a consumer product “designed or intended primarily for children 12 years of age or younger.”
- Factors considered to determine if product is a children's product:
 - Manufacturer's statement about intended use (includes label on product)
 - Marketing and Promotion
 - Common Recognition by consumers
 - Staff's Age Determination Guidelines
 - Additional information available: www.cpsc.gov/childrensproduct
- Some products may be designed or intended for use by consumers of all ages, including children 12 years old or younger. Such products would be considered “general use products.”

Additional Requirement for Children's Products



Lead Content

- Must not contain more than 100 parts per million (ppm) of total lead content in accessible parts.
- Inaccessible component parts are excluded

Tracking Labels

- Requires products and their packaging to bear a permanent distinguishing mark that contains certain information, including:
 - Manufacturer or private labeler name;
 - Location and date of production of the product;
 - Detailed information on the manufacturing process, such as a model or batch number; and
 - Any other information to facilitate ascertaining the specific source of the product.

Certification



Every domestic manufacturer or importer of a CSU must issue a certificate of compliance that they meet the rule based on testing.

- General Certificate of Conformity (GCC): Required for general use product.
- Children's Product Certificate (CPC): Required if intended for children 12 years old and under.
- Illustrative examples of certificates for various products can be found here www.cpsc.gov/CPC and www.cpsc.gov/GCC.

Testing Children's Products



Third Party Testing

- Third party testing serves as the basis for a company to certify in a CPC that its children's product is compliant with each applicable children's product safety rule.
- Tested by a CPSC-accepted laboratory: www.cpsc.gov/labsearch
- Required during initial certification, material change, and periodically testing.
 - Additional Information available: www.cpsc.gov/testing



Enforcement Outcomes

Generally, if a product is collected and evaluated, the following outcomes may occur:

- **CSU meets mandatory requirements**
 - No corrective action is warranted
- **Violation Determined**
 - Stop sale, Recondition Inventory, and/or Destruction
 - Recall, Consumer Notification, and CPSC Approved Remedy is Provided

Q: Is there a stockpiling provision for the new CSU rule?

No. Neither STURDY nor CPSC's final rule at 16 CFR part 1261 include any stockpiling provision for products manufactured on or prior to the effective date.

In the interest of public safety, CPSC encourages the sale of products to be compliant with the new rule as soon as possible. Products may still be subject to corrective actions if CPSC determines they present a "substantial product hazard" per 16 CFR part 1115.

Q: Can counterweights or other stability features be sold separately to consumers?

No.

Pre-assembled CSUs must have the stability features already installed.

Stability features for CSUs that are ready-to-assemble must not be offered as a choice or option during purchase (invoice must not list the feature as a second item), but it can be shipped in a separate package for transport purposes.



9.1 Test to Evaluate Interlock System

- Apply a 30-lbf horizontal pull force on each interlocked extendible element
- Additional requirements in Section 4.6 include that interlocks shall not require additional consumer action to engage during normal operation of the extendible element



Requirement: Interlocked element remains closed and functional, or its opening closes the open element

Stability Tests



- 9.2.1 Simulated Clothing Load
- 9.2.2 Simulated Horizontal Dynamic Force
- 9.2.3 Simulating a Reaction on Carpet with Child Weight

Requirement: Unit shall not tip over or be supported by any component unless that component was specifically designed for that purpose



9.2.1 Simulated Clothing Load Test

- All doors open and all available extendable elements extended; unit is filled with a clothing-representative load, if applicable

If 50% or more of the storage volume is extended, test with fill (calculated in Section 5.4)



If less than 50% of the storage volume is extended, test empty



9.2.2 Simulated Horizontal Dynamic Force Test



- All doors open and all available extendable elements extended, unit is empty
- Apply a 10 lbf horizontal force to the highest handhold ≤ 56 inches



Top edge of drawer or center of the pull area of an extendable element



Door handle/pull

9.2.3 Simulating a Reaction on Carpet with Child Weight Test



- All doors open and all available extendable elements extended, unit is empty
- Unit angled using test blocks under rear legs
- Apply the 60-pound test apparatus to the top of the door or extendible element most likely to cause tipover



Q: Are fill weights used in all three stability tests?

No.

Only the “Simulated Clothing Load” test at section 9.2.1 of ASTM F2057-23 references fill weights. The other two stability tests are conducted without the use of fill weights.

Q: Is the test block used in all three stability tests?

No.

Only the “Simulating a Reaction on Carpet with Child Weight” test at section 9.2.3 of ASTM F2057-23 uses the test block. The other two stability tests are conducted without the test block.

Warning



- Signal word panel
 - Safety alert symbol – ⚠
 - Signal word – WARNING
- Warning message panel
 - (Alternative) CSUs to be used with TVs
 - (Dependent) CSUs with interlocks
- Safety symbol panel
 - Child climbing prohibition symbol
 - (Dependent) TV prohibition symbol

⚠ WARNING	
	Children have died from furniture tipover. To reduce the risk of furniture tipover: <ul style="list-style-type: none">• ALWAYS install anti-tip device provided.• NEVER put a TV on this product.• NEVER allow children to stand, climb, or hang on any drawers, doors, or shelves.• NEVER open more than one drawer at a time.• DO NOT defeat or remove the drawer interlock system; it is an important stability and safety system.• Place heaviest items in the lowest drawers.
	<i>This is a permanent label. Do not remove!</i>

Example warning for a unit with an interlock system that is not designed for use with a TV

Warning cont.



- Content requirements vary based on whether the unit is designed for use with a television, and whether it has interlocks; some customization allowed
- The warnings shall be in a conspicuous location when in use, as defined in Section 10.1.1.1
- Warning labels shall be permanent, testing in Section 9.3

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Example warning for a unit with an interlock system that is not designed for use with a TV

Q: Is there a requirement for a hangtag or other labeling?

No.

The new CSU rule pursuant to STURDY does not include a requirement for a hangtag or labeling outside of what is prescribed in ASTM F2057-23.

Q: Can my warning look different than the examples in ASTM F2057-23?

Yes, with some caveats.

Any format is acceptable as long it follows the formatting outlined in ANSI Z535.4 and ASTM F2057-23.

Minimum sizes for icons, panels, and text are noted in section 10 of ASTM F2057-23.



Resources

- CPSC's CSU business guidance page:
www.cpsc.gov/Business--Manufacturing/Business-Education/Business-Guidance/Clothing-Storage-Units
- ASTM's Reading Room:
www.astm.org/products-services/reading-room.html
- Business Education playlist on YouTube:
www.youtube.com/playlist?list=PLPbI8bR243fF7PVUkmRDrxZPjLsCse6xq

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