

Advocacy Comments on CPSC’s Proposal to Establish Safety Standards for Clothing Storage Units

On February 3, 2022, the U.S. Consumer Product Safety Commission (CPSC) published a proposed rule establishing safety standards for clothing storage units (CSUs). The proposed rule requires that CSUs be tested and exceed minimum stability requirements, be marked, and labeled with safety information, and bear a hang tag providing data about the unit’s stability.

The prevention of risk of injury or death to children by furniture tip-over accidents is of the utmost importance. However, CPSC should attempt to consider reasonable alternatives to the proposed rule that would ease the burden on small businesses while still meeting the Commission’s objectives. Advocacy made the following comments on the rule:

- CPSC’s initial Regulatory Flexibility Act analysis underestimates the impact the proposed rule will have on small businesses. CPSC should consult with Advocacy to understand the full scope of impacts to small businesses on the proposed rule.
- Advocacy encourages CPSC to consider alternatives that reduce the burden to small businesses while still improving child safety.
 - CPSC should consider a later effective date for the rulemaking to allow small businesses time to comply. In the interim, the Commission should require small businesses to educate and assist consumers with existing product safety options.
 - CPSC should reconsider its two proposed testing methods, as they produce different results that may be confusing for consumers and small businesses alike.
 - CPSC should consider updating existing voluntary standards if appropriate.
 - CPSC should clarify that once a product has been tested and certified, small importers and retailers may rely on that certification without incurring additional testing costs.

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