

## CPSC PUBLISHES NEW MANDATORY STANDARD FOR CLOTHING STORAGE UNITS

May 10, 2023

The U.S. Consumer Product Safety Commission last week published a final rule finding that ASTM F2057-23 meets the requirements of the Stop Tip-overs of Unstable, Risky Dressers on Youth (STURDY) Act and adopting it as a mandatory standard to prevent tip-overs of clothing storage units. The rule will apply to clothing storage units manufactured after September 1, 2023.

The STURDY Act defines clothing storage units (CSUs) as “any free-standing furniture item manufactured in the United States or imported for use in the United States that is *intended* for the storage of clothing, typical of bedroom furniture.”(emphasis added)<sup>[1]</sup> Examples include, but are not limited to, “chests, chests of drawers, drawer chests, armoires, [chifforobes], bureaus, door chests, and dressers.”<sup>[2]</sup> CSUs are subject to the mandatory rule if they are:

- 27 inches or greater in height;
- 30 pounds or greater in mass; and
- contain 3.2<sup>3</sup>feet or greater of enclosed storage volume.

Under ASTM F2057-23, CSUs must meet a set of three stability tests to simulate the capability of a child weighing up to 60 pounds interacting with a CSU. The final rule describes these as follows:

- The first stability test, Section 9.2.1 Simulated Clothing Load, loads drawers with simulated clothing loads. The CSU must not tip over with all doors and extendible elements (movable load-bearing storage components including, but not limited to, drawers and pullout shelves) open.
- The second stability test, Section 9.2.2 Simulated Horizontal Dynamic Force, applies a 10-pound horizontal force over a period of at least 5 seconds at a “hand-hold” not to exceed a 56-inch height, and then holds the force for at least 10 seconds.
- The third stability test, Section 9.2.3 Simulating a Reaction on Carpet with Child Weight, uses 60 pounds of weight placed on the edge of an open drawer or pull-out shelf, while the CSU is

tilted forward using a 0.43 inch test block to simulate placement on a carpeted surface, with all doors and extendible elements open.

ASTM F2057-23 also requires permanent labeling of CSUs with specified safety warnings.

The CPSC's adoption of ASTM F2057-23 as a mandatory standard follows months of uncertainty in the industry. On November 25, 2022, the CPSC proposed a mandatory federal safety standard for CSUs that was to "significantly change the way clothing storage units are tested and labeled," and was to take effect May 24, 2023.

On December 23, 2022, however, President Biden signed the STURDY Act into law, requiring the CPSC to consider a voluntary industry standard, ASTM F2057-19, and to adopt it as a mandatory standard within a year of the law's enactment, so long as the standard met the performance requirements set out in the STURDY Act.

In February 2023, ASTM updated and published the revised standard, F2057-23, which CPSC voted to adopt (by a vote of 3-1) on April 19, 2023. The move was welcomed by industry, as the proposed CPSC rule would have applied to a larger group of products and would have required more complicated and difficult-to-meet testing requirements.

For questions or more information on this or other CPSC related issues, please contact the authors.

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<sup>[1]</sup>Section 201(a).

<sup>[2]</sup>ASTM F2057-23.

## MEET THE TEAM



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