



**Comments of Nancy Cowles, Executive Director
Kids In Danger
To the U.S Consumer Product Safety Commission Crib Bumper Expert Panel Hosted by
Commissioner Robert Adler
October 26, 2016**

Good Morning. My name is Nancy Cowles and I am the executive director of Kids In Danger (KID). KID is a nonprofit organization dedicated to protecting children by improving children's product safety. Our mission is to promote the development of safer products, advocate for children and educate the public about dangerous children's products -- such as crib bumper pads.

KID was founded in 1998 by the parents of Danny Keysar who was killed in a recalled portable crib in his licensed child care home in Chicago. In forming KID, his parents made it their mission to prevent other tragedies such as the one they suffered.

I appreciate all the in-depth information we have heard here today. The earlier staff report presented a skewed view of the data – one that has been balanced by the statements here today. The case against permitting padded crib bumpers in a child's sleep environment is clear. This isn't medicine vital to a child's health that may have some side-effects we must weigh. It isn't a product that serves a useful purpose for safety and proper education on its safe use is needed. This is an unnecessary accessory to decorate a nursery that has no place in a safe sleep environment. Industry has attempted to paint this as a 'safety item' but it is not. By talking about the "safety" benefits of bumper pads, both the manufacturers and CPSC staff are saying a crib isn't safe on its own – despite the world's strongest crib standard – a very dangerous message. Decorate the nursery, not the crib!

In our educational materials and when talking to parents, KID has always warned against crib bumper pads. Any soft bedding in a crib or bassinet can cause suffocation and has been linked to SIDS. Older babies who can pull to a stand, can use the bumper pads as footing to catapult out of the crib – possibly facing severe injuries from a fall. While most deaths in cribs are caused by suffocation or entrapment, most non-fatal injuries come from falls.

When Dr. Bradley Thach published his research in 2007 in the Journal *Pediatrics*, we thought that would put an end to the use of crib bumper pads. Dr. Thach, of Washington University in St. Louis, found 27 deaths over a period of about a decade that were attributable to bumper pads – where babies were found with their face or head against the bumper pad or wedged between the mattress and bumper pad. But unfortunately, crib bedding manufacturers tried to discredit this doctor's research and promoted bumpers as a safe product for cribs. You have heard today from NJ Sheers and Dr. Thach the updated data that shows the same outcome – bumpers have been involved in deaths.

In early 2010, we were approached by two families that renewed our commitment to seeing this product off the market.

In February 2010, Aiden suffocated against his crib bumper in Texas. We were contacted by his grandmother. She had purchased the bumper pads herself, led to believe they were part of a safe sleep environment and important to keep her grandson from injuring himself. Imagine her heartache after learning that the very thing she purchased thinking it would protect her beloved grandson ended up being what suffocated him as he slept.

Then we heard from the family of Preston Maxwell. Just eight weeks old, Preston slept on a sleep positioner in the middle of his crib. His distraught parents found him one morning – he had rolled off the sleep positioner and ended up with his face between the bumper pad and mattress. Immediately after Preston's death, the US Consumer Product Safety Commission along with the FDA -- led by Dr. Sharfstein -- issued a warning against sleep positioners-- saying they were unnecessary AND dangerous. For years, that reduced the number of sleep positioners on the market to almost 0. We are beginning to see them creep back in now online and urge CPSC to stay vigilant on this issue. But no action was taken by CPSC to eliminate the padded bumper Preston suffocated against.

Among children's product safety issues, a safe sleep environment is an overriding concern. Suffocation – most of it in a sleeping environment – is a leading cause of unintentional death in infants. The number of sleep related deaths in infants is too high and is not showing signs of decreasing – it is a public health emergency. Whether they are bassinets, portable cribs, play yards, cribs, or some newly designed product or accessory, sleep products must meet the highest standards for safety. It is the one place we leave infants alone.

Crib bumper pads were developed when crib slats were far apart and there was a risk of a child slipping through, only to be caught by the neck and strangle. It didn't work, babies still strangled that way and crib standard changed to limit the space between slats decades ago. But the padding remains – now as a decorative item that some parents are falsely led to believe will keep their baby safer. Manufacturers point to it keeping a baby's arms or legs from getting stuck between the slats. But a review of SaferProducts.gov show that close to 90% of the reports made of that problem are of babies over the age of six months – when manufacturers themselves recommend the product be removed to avoid a baby stepping on it to climb out of the crib. So they seem to be saying that if parents don't heed their warnings, the product offers protection. We must stop the use of crib bumper pads for our vulnerable babies. A bump or bruise of the leg or even head is nothing compared to the horror that Preston and Aiden's family and others like them face when they find a lifeless baby.

Crib bumper pads pose an unnecessary risk to sleeping infants. Earlier this week and again here today the American Academy of Pediatrics warned against the use of crib bumper pads in their safe sleep guidelines. Based on AAP recommendations and the history of suffocation and possible link to SIDS, almost all hospitals tell parents not to use crib bumpers in the crib. Retailers such as Target and IKEA have removed bumpers from their shelves. Most childcare facilities in the country are prohibited from using bumpers. Child care regulations in states are often an opportunity to put best practices in place – we can monitor and regulate what is used in these settings as opposed to in private homes. If it is important for your child's nap at child care it should be important at home.

The CPSC has been petitioned to accept the ASTM standard for infant bedding that covers crib bumper pads. Manufacturers continue to point to that as proof bumpers are now safe. But that standard, which only limits bumpers to two inches of thickness – more than twice what most bumpers are already -- simply means that the very type of bumpers we know have suffocated children –would now be labeled by the CPSC as safe.

In addition to the direct risk of suffocation from crib bumper pads, there is also the issue of contributing to SIDS by reducing airflow in the crib AND confusing parents on the safe sleep message that encourages a bare crib. The safe sleep message is a hard one. The messaging is simple and straightforward – back to sleep and bare is best. And both messages have reduced infant deaths. But “Bare is Best” runs smack into our intuition of what is we think babies need. We even call a mother preparing for her baby ‘nesting’ – surrounding the baby with softness and cuddling them even when we aren’t holding them. But that softness and padding is the opposite of how babies sleep safely. Which is why the sale of padded bumpers not only increases the risk of babies suffocating on the pad itself, but of following the lead of manufacturers by adding more padding and softness around the baby. It is hard to convince parents to remove padded items such as pillows from the crib when you are selling them a two-inch thick pad to wrap around the crib at the same time. Those in the child safety and public health arenas work tirelessly to educate parents on this concept – padded bumpers make it all the harder.

Commission Adler, you participated a few weeks ago in a workshop on the effectiveness of information and education campaigns to reduce injuries. We heard how without changes in design or regulation, the education has little effect. Parents are bombarded with images such as these almost every time they are online. AMAZON) multiplied many times.

As long bumpers are still on store shelves, they will continue to be used despite every health and safety organization warning against their use.

You have heard a lot of compelling information here today. I know the debate on it will continue despite that. But I urge you to move to protect our most vulnerable consumers from this unnecessary product. As I said, we thought in 2007 we had enough data to compel us to stop selling this product. I was wrong then, but hope you will take that action now, almost 10 years later.

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