**Testimony of Courtney Griffin, Director of Consumer Product Safety**

**Consumer Federation of America**

**Before the U.S. Consumer Product Safety Commission**

**Hearing on “Agenda and Priorities FY 2026 and/or 2027”**

Consumer Federation of America (CFA) appreciates the opportunity to provide testimony about the Consumer Product Safety Commission’s (CPSC) agenda and priorities for Fiscal Year 2026 and 2027. CFA is a non-profit association of approximately 250 pro-consumer groups that was founded in 1968 to advance the consumer interest through advocacy and education.

The CPCS is at a critical juncture, and it must retain its independence in order to fulfill its lifesaving mission. The CPSC was established by Congress in 1972 as an independent, bipartisan agency, specifically to insulate its critical safety mission from political interference and to ensure that the public interest, not partisan or special interests, remains paramount. This independence is not a bureaucratic formality; it is the foundation for the CPSC’s ability to act swiftly and decisively to protect Americans from hazardous products. The CPSC’s focus and expertise, built over five decades, must not be eliminated, diluted, or weakened in any way. At a time when the scope and complexity of consumer product risks are growing, especially with the explosion of e-commerce and imports, a weaker or non-existent CPSC leaves Americans, especially children, at greater risk of injury and death from unsafe household products.

The CPSC’s track record speaks for itself: dramatic reductions in residential fires, child poisonings, crib deaths, and injuries from everyday products. These achievements are the direct result of the agency’s independence, expertise, and singular focus. Eliminating the CPSC would dismantle this proven system and replace it with an untested, less accountable bureaucracy, undermining decades of progress and exposing American families to preventable harm.

**Recommendations for CPSC Priorities**

As the CPSC faces unprecedented threats to its existence, it is essential that the agency, and those who support its mission, remain focused on the most pressing consumer safety challenges. I urge the Commission to prioritize the following:

**1. Online Marketplaces**

The CPSC must strengthen its oversight of products sold through online platforms to ensure compliance with U.S. safety standards and prevent unsafe imports from reaching American homes. Online marketplaces must be held accountable for the non-compliant products they host, as they are a primary channel through which violative products reach the American public. The CPSC should also continue its collaboration with Customs and Border Protection to intercept hazardous goods at the border and modernize its enforcement tools. However, enforcement and product interception cannot be separated from the agency’s vital research, rulemaking, and compliance efforts. These functions are interdependent and essential to effectively protecting American consumers.

**2. Data-Driven Action**

To continue its lifesaving work, the CPSC must be equipped to identify emerging hazards and prioritize interventions that will have the greatest impact on protecting American families. This requires timely, accurate, and comprehensive data to guide decision-making and resource allocation. The National Electronic Injury Surveillance System (NEISS), along with other data collection tools, plays a critical role in tracking injury trends and detecting potential risks associated with consumer products. To be effective, these tools must be modernized, strengthened, and fully supported with adequate funding and technical resources. A robust data infrastructure is essential to ensure that the CPSC can act swiftly and effectively to prevent injuries and save lives.

**3. Children’s Product Safety**

The CPSC must continue its strong action on infant sleep products, toys containing button or coin cell batteries, and other high-risk children’s products, building on recent successes in reducing injuries and deaths. This includes crucial data collection, research, rulemaking, and compliance efforts. Further, the CPSC must expand its public education campaigns targeting parents and caregivers about emerging hazards.

**4. Lithium-Ion Batteries**

We applaud the Commission’s recent decision to continue its lifesaving work on lithium-ion batteries. The CPSC must finalize a rule for lithium-ion batteries to address the growing number of fires, injuries, and deaths linked to their use in everyday consumer products. These powerful batteries are found in variety of items, yet many are poorly manufactured or lack proper safety mechanisms, leading to dangerous overheating, explosions, or fires. With increasing reports of incidents, the lack of consistent safety standards poses a clear and escalating public safety risk. A finalized rule would provide consumers with much needed protection.

**5. Window Coverings**

CFA calls on CPSC to finalize a strong rule for custom window coverings that adequately addresses hazardous looped cords and chains. CPSC identified window cords as a “particularly insidious hazard” in 1981.[[1]](#footnote-1) Yet more than 40 years and several voluntary standards later, hundreds of families have suffered unspeakable tragedies. CPSC’s data demonstrate that looped operational cords have the highest death and injury rate of all cord types. CPSC staff has stated that

“[t]o prevent the strangulation hazard to children, window coverings should be inherently free of accessible strangulation hazards, meaning not presenting a strangulation hazard as manufactured, and should not require any consumer intervention with the product to address the hazard. Incident data demonstrate that tension devices may come off the wall, may not be installed at all, or may not keep continuous loops taut enough to prevent incidents. As shown in the incident data, window coverings that inherently address the strangulation hazard, and do not rely on the consumer or a third party installer to install a safety device, are the most effective approach to addressing the strangulation hazard.”[[2]](#footnote-2)

CFA urges CPSC to finalize a rule that fully considers the hazards presented by looped cords and chains on custom window coverings.

We also call on the CPSC to develop and implement a better consumer education campaign to provide the public with critical safety information about the hazards posed by window coverings. Over the decades, CPSC and industry have shared a variety of safety strategies that are now known to be ineffective. Window coverings are a ubiquitous consumer product presenting a potentially fatal hidden hazard. Consumers deserve a uniform, evidence-based education campaign to ensure safety within their homes and communities.

1. **Child Injuries and Deaths Related to Off-Highway Vehicles (OHVs)**

CFA and its partners documented a dramatic increase in OHV-related fatalities in 2024. CFA identified at least 632 OHV-related fatalities last year. There was also a significant increase of children’s deaths from 2023 to 2024. In 2024, at least 120 OHV fatalities – or 19% – were children 16 years of age or younger. These numbers are likely underestimates as they are based solely on media reports and may grow as more data become available regarding additional deaths. We urge the CPSC to protect children from these preventable horrific injuries and death.

We also urge the CPSC to be a strong voice in opposing the operation of OHVs on roads, and to be a leader in educating consumers about the dangers of on-road OHV use. Data from the CPSC and from the National Highway Transportation Safety Administration’s (NHTSA) Fatality Analysis Reporting System (FARS) document that most ATV deaths take place on roads. CFA’s data confirm and underscore this fact. In 2023, at least 67% of the OHV-related deaths occurred on roads. Even the industry association representing ATV manufacturers and distributors unequivocally opposes the use of ATVs on roads.[[3]](#footnote-3) The design of ATVs makes them incompatible with operation on roads. ATVs have a high center of gravity, and narrow wheelbases, which increase the likelihood of tipping when negotiating turns. The low-pressure knobby tires on ATVs are explicitly designed for off road use and may not interact properly with road surfaces.

Additionally, the CPSC should improve the reporting of OHV death data by including how many deaths occur on private versus public roads and should seek to reduce the significant time lags in releasing OHV death and injury data. The data are critical to understand the scale of the safety challenges.

**Conclusion**

The CPSC is a small agency with an outsized impact on the safety and well-being of every American family. Its unique combination of independence, technical expertise, and regulatory authority makes it an essential guardian of public health and safety. From protecting children from dangerous toys to addressing emerging risks in connected devices and e-commerce platforms, the CPSC’s work touches nearly every aspect of daily life. Today, we recognize and thank the agency for its critical efforts and longstanding commitment to consumer protection. At the same time, we recognize that the safety of our children, families, and communities depends on a strong, independent, forward-looking CPSC.

1. CPSC, Accidental Strangulations (Ligature) of Children Less than 5 Years of Age (May 1981), pg. 18. [↑](#footnote-ref-1)
2. CPSC Comment Letter to WCMA, WCMA 2022 Ballot (Aug. 2022). [↑](#footnote-ref-2)
3. Specialty Vehicle Institute of America, “Opposition to On-Road Operation of ATVs,” available for download at <https://svia.org/opposition-to-on-road-use/>. [↑](#footnote-ref-3)