

March 2, 2026

Also submitted via www.regulations.gov

**Joint Comments of Consumer Reports and Consumer Federation of America
to the U.S. Consumer Product Safety Commission on: Request for Comment on
“Safety Standard for Clothing Storage Units”
Docket No. CPSC-2017-0044**

On behalf of Consumer Reports and Consumer Federation of America, we welcome the opportunity to submit comments to the Consumer Product Safety Commission (CPSC) regarding the agency’s information collection requirements associated with the Safety Standard for Clothing Storage Units. We strongly support this life-saving rule, and offer the following comments on the extension of the collection of information related to clothing storage units (CSUs) requirements:

Our organizations understand firsthand the effort that went into developing the agency’s CSU standard and the importance of continuing to collect information related to its requirements. For years, we advocated for a strong federal standard and worked closely with Parents Against Tip-Overs (PAT) to strengthen the requirements of ASTM F2057-23, Standard Safety Specification for Clothing Storage Units. On April 19, 2023, the Commission determined that ASTM F2057-23 met the requirements of the Stop Tip-overs of Unstable, Risky Dressers on Youth Act (STURDY) Act, and it was incorporated by reference and promulgated as a consumer product safety standard, and took effect on September 1, 2023.¹

Every element of ASTM F2057-23/16 CFR part 1261, including the CSU warning label requirements, were developed in collaboration between parent advocates, consumer safety organizations, and furniture industry representatives, manufacturers, and importers. All compliance burdens associated with the standard, including those for warning labels, were carefully developed, considered, and agreed to by ASTM members through a rigorous consensus-based process, with industry participants publicly affirming that the requirements are feasible, reasonable, and essential for safety.

These warning labels—with their specific statements and pictograms—are vital to help consumers understand the severe risks associated with unstable CSUs, in order to prevent child injuries and deaths. The burdens associated with these consensus-based labeling requirements are reasonable, and non-negotiable from a safety perspective. The CPSC must continue collecting this information to ensure industry compliance with the standard, and to protect children from tip-over injuries and deaths.

In addition to the current information collected by the agency, we also strongly urge the CPSC to require a permanent label on all CSUs that identifies the manufacturer’s name and contact information, the unit’s model number and date of manufacture. Requiring that every CSU sold in the United States has a permanently affixed, easily accessible informational label would enable consumers to easily and accurately identify a CSU when reporting a safety incident or checking if their unit is impacted by a recall or safety warning. Further, it would enable the CPSC and manufacturers to quickly investigate incidents,

¹ CPSC, “Safety Standard for Clothing Storage Units” (May 4, 2023) (online at: www.federalregister.gov/documents/2023/05/04/2023-08997/safety-standard-for-clothing-storage-units)

identify non-compliant products, and carry out recalls or warnings. Manufacturers could also provide this information electronically, for example, on their website or through a scannable QR code, but electronic options should not be permitted as a substitute for a permanent physical label containing this information.

CPSC enforcement actions since the final CSU rule took effect confirm that persistent, proactive oversight is necessary to protect children and families. Since the rule went into effect in 2023, the agency has issued dozens of recalls for violations of the mandatory standard. Since March 1, 2025, the CPSC has issued 30 recalls and safety warnings for violations of the CSU standard.² The sheer number of recalls makes clear that, even with a clear mandatory standard, dangerously unstable CSUs enter the market. Only continuous monitoring, including thorough information collection, and rigorous enforcement of the CPSC's mandatory standard can keep non-compliant products out of homes.

The CPSC has a duty to protect consumers from product-related hazards, and robust labeling requirements are essential to providing consumers with critical safety information to prevent CSU tip-over incidents. To prevent tip-over injuries and deaths, our organizations strongly support the continuation of the information collection requirements for CSUs. Thank you for your consideration of our comments.

Respectfully submitted,

Consumer Reports
Consumer Federation of America

² CPSC, "Recalls & Product Safety Warnings" (Accessed: March 2, 2026) (online at: www.cpsc.gov/Recalls?search_combined_fields=clothing%20storage%20unit&field_rc_date_value=2025-03-01&field_rc_date_value_1=2026-03-02&field_rc_hazards_target_id=All&field_rc_recall_by_product_target_id=2801&field_rc_manufactured_in_value=&page=0)