



October 1, 2020

Kristen Talcott, Ph.D.
U.S. Consumer Product Safety Commission
Division of Human Factors
5 Research Place
Rockville, MD 20850

Re: Clothing Storage Unit Rulemaking

Dear Dr. Talcott,

On behalf of IKEA of Sweden, let me begin by expressing our gratitude to you and your colleagues at the CPSC for your continued dedication to advancing the agenda on consumer safety. We want to serve as a partner to the CPSC to develop solutions and support your work in a way that helps solve today's most pressing product safety issues.

At IKEA, we feel a great sense of responsibility for the safety and health of our customers and of all consumers. That's why, at the technical level, I have appreciated the opportunity to work closely and transparently with you and your colleagues to exchange experience, data and innovative solutions to reduce tip-over incidents of clothing storage units. We have done the same within ASTM in an effort to improve and strengthen the existing standard (ASTM-2057-19).

From the IKEA standpoint, we see a mandatory rule in the United States as the best way to provide clarity to manufacturers, build consumer trust, set a level playing field and most importantly, reduce tip-over incidents. In November 2017, the CPSC published an advance notice of proposed rulemaking (ANPR) to address the tip-over risks associated with clothing storage units. We were encouraged to hear that the Commission plans to introduce a notice of proposed rulemaking (NPR) by the end of the year. We understand that COVID-19 has put pressure on ways of working, but we hope the CPSC will prioritize and resource rulemaking in this area.

We encourage the CPSC to consider the following comments related to both the testing methods for stability technical solutions and the scope of a mandatory rule.

Postal address	Org. No	Telephone	Telefax
IKEA of Sweden	556074-7551	+46(0)476 - 810 00	+46(0)476 - 827 17
Box 702			
S-343 81 ÄLMHULT			
SWEDEN			



October 1, 2020

Design-inclusive testing methods

At IKEA, we have a history of finding innovative solutions to improve safety and health for the customer. For furniture stability, our innovation team has created multiple prototype solutions that have the potential to further increase user friendliness and enhance safe use. Earlier this year, we introduced one such solution, [GLESVÄR](#), to the US market. GLESVÄR is a dresser that meets the requirements of the existing ASTM voluntary standard. But what makes GLESVÄR unique is its interlock function that only allows a customer to open a limited number of drawers at a time, unless attached to a wall. Based on the current ASTM testing requirements, the interlock feature may not be acknowledged as part of the test, so it's unclear whether the function should be disengaged before testing. We think this is a missed opportunity to encourage development of even more design solutions. To move away from design-restrictive requirements, any mandatory rule should include language that adapts testing for technical safety solutions. The door needs to be opened – and industry needs to be encouraged – to constantly seek out better ways to incorporate stability into designs.

Scope: Chests, Bureaus, Dressers

In 2019, the CPSC [reported](#) that between 2000 and 2018, 184 child fatalities occurred in the US involving a “clothing storage unit” tipping over, either with or without a TV.¹ Of these fatalities, 174 involved a bureau, chest or dresser.² This means that 95% of child fatalities from tip-over of a clothing storage unit, as defined by today's standard, involved a bureau, chest or dresser. With this incident data as a guide, we believe there is a clear pathway to develop the rule with a scope focused on clearly defined “bureaus,” “chests” and “dressers.” The current standard (ASTM-F2057-19) is wide-ranging and leaves too much open to interpretation. At best, the scope leaves manufacturers attempting to apply the same standard to a large range of products that pose little to no tip-over hazard or that cannot be appropriately tested to the standard. At worst, it puts up obstacles to setting more effective testing requirements for those products known to present the biggest risks. A mandatory rule must be based on the data. With a more focused scope on

¹ Based on today's standard, “clothing storage unit” would cover the categories of chests, bureaus, dressers, wardrobe, armoires, cabinets, and miscellaneous in the CPSC report figures. Of children fatalities, 95% involved a chest, bureau or dresser.

² https://www.cpsc.gov/s3fs-public/2019_Tip_Over_Report.pdf (See page 23, Figure 2 and page 24, Figure 3)



October 1, 2020

bureaus, chests and dressers, a rule will allow for more relevant and properly strengthened testing for those products.

For too long, stakeholders have discussed the need to clarify and strengthen today's recommended requirements in the U.S. It's time to take action. We look forward to seeing the NPR in the coming months and hope the CPSC will seize its ability to swiftly mandate on this topic. From IKEA, we stand ready to support the CPSC in these efforts and to further explain the IKEA point of view through a virtual meeting, should it be useful to you.

Sincerely,

Stefan Svensson
Product Requirement Team Manager
Physical and Mechanical
Range and Product Development
IKEA of Sweden AB

CC: CPSC Acting Chairman Robert S. Adler
CPSC Commissioner Elliot F. Kaye
CPSC Commissioner Dana Baiocco
CPSC Commissioner Peter A. Feldman