



Designation: **F2388 – 17a F2388 – 18**

# Standard Consumer Safety Specification for Baby Changing Products for Domestic Use<sup>1</sup>

This standard is issued under the fixed designation F2388; the number immediately following the designation indicates the year of original adoption or, in the case of revision, the year of last revision. A number in parentheses indicates the year of last reapproval. A superscript epsilon ( $\epsilon$ ) indicates an editorial change since the last revision or reapproval.

## INTRODUCTION

This consumer safety specification addresses incidents associated with baby changing products identified by the U.S. Consumer Product Safety Commission (CPSC). Incidents involved collapse, falls from the table, and entrapment in structural members.

In response to incident data collected by CPSC, this consumer safety specification attempts to minimize the risk of injury and death due to: (1) falls from changing tables, (2) failure of structural or mechanical components, (3) instability and entrapment in openings in the table structure, and (4) suffocation. This specification also contains requirements for warnings and instructional materials directed to parents or caregivers.

## 1. Scope

1.1 This consumer safety specification covers performance requirements, test methods, and labeling requirements to promote the safe use of baby changing products including changing tables, changing table accessories, contoured changing pads, and add-on changing units.

1.2 This specification covers products sold for domestic use for children up to a weight of 30 lb (13.6 kg).

1.3 Changing products shall meet all applicable performance and labeling requirements.

1.4 No changing product produced after the approval date of this specification shall, either by label or other means, indicate compliance with this specification unless it conforms to all applicable requirements contained herein, before, and after all testing.

1.5 The values stated in inch-pound units are to be regarded as standard. The values given in parentheses are mathematical conversions to SI units that are provided for information only and are not considered standard.

1.6 The following precautionary caveat pertains only to the test method portion in Section 7 of this specification. *This standard does not purport to address all of the safety concerns, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate safety, health, and environmental practices and determine the applicability of regulatory requirements prior to use.*

1.7 *This international standard was developed in accordance with internationally recognized principles on standardization established in the Decision on Principles for the Development of International Standards, Guides and Recommendations issued by the World Trade Organization Technical Barriers to Trade (TBT) Committee.*

## 2. Referenced Documents

2.1 *ASTM Standards:*<sup>2</sup>

[D3359 Test Methods for Rating Adhesion by Tape Test](#)

[F406 Consumer Safety Specification for Non-Full-Size Baby Cribs/Play Yards](#)

[F963 Consumer Safety Specification for Toy Safety](#)

[F1169 Consumer Safety Specification for Full-Size Baby Cribs](#)

[F2057 Safety Specification for Clothing Storage Units](#)

<sup>1</sup> This consumer safety specification is under the jurisdiction of ASTM Committee F15 on Consumer Products and is the direct responsibility of Subcommittee F15.18 on Cribs, Toddler Beds, Play Yards, Bassinets, Cradles and Changing Tables.

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<sup>2</sup> For referenced ASTM standards, visit the ASTM website, [www.astm.org](http://www.astm.org), or contact ASTM Customer Service at [service@astm.org](mailto:service@astm.org). For *Annual Book of ASTM Standards* volume information, refer to the standard's Document Summary page on the ASTM website.

## 2.2 Federal Regulations:<sup>3</sup>

16 CFR 1303 Ban of Lead-Containing Paint and Certain Consumer Products Bearing Lead-Containing Paint

16 CFR 1500 Hazardous Substances Act Regulations including sections:

16 CFR 1500.48 Technical Requirements for Determining a Sharp Point in Toys or Other Articles Intended for Use by Children Under Eight Years of Age

16 CFR 1500.49 Technical Requirements for Determining a Sharp Metal or Glass Edge in Toys or Other Articles Intended for Use by Children Under Eight Years of Age

16 CFR 1500.50-.52 Test Methods for Simulating Use and Abuse of Toys and Other Articles Intended for Use by Children

16 CFR 1501 Method for Identifying Toys and Other Articles Intended for Use by Children Under Three Years of Age Which Present Choking, Aspiration or Ingestion Hazards Because of Small Parts

Consumer Product Safety Improvement Act

## 2.3 ANSI Standards:<sup>4</sup>

ANSI Z535.4 American National Standard for Product Safety Signs and Labels

ANSI Z535.6 American National Standard: Product Safety Information in Product Manuals, Instructions, and Other Collateral Materials

## 3. Terminology

### 3.1 Definitions of Terms Specific to This Standard:

3.1.1 *add-on changing unit, n*—a rigid addition to or separate product used in conjunction with an item of furniture that provides barriers to prevent the infant from rolling off the product when a diaper is being changed.

3.1.2 *barrier, n*—any component of the changing product intended to prevent a child from rolling or falling off the changing surface.

3.1.3 *changing pad, n*—a flat or contoured pad specifically designed for the purpose of changing the diaper of a child with a body weight of up to 30 lb (13.6 kg) on an elevated surface. The child is placed on the pad during the process of changing.

3.1.4 *changing product*—one of the following: changing table, changing table accessory, add-on changing unit, contoured changing pad.

3.1.5 *changing surface, n*—the surface that is in direct contact with the child when the changing product is in the manufacturer's recommended use position.

3.1.6 *changing table, n*—an elevated, freestanding structure generally designed to support and retain a child with a body weight of up to 30 lb (13.6 kg) in a horizontal position for the purpose of allowing a caregiver to change the child's diaper. Changing tables may convert from or to other items of furniture, such as, but not limited to, a dresser, desk, hutch, bookshelf, or play yard, may have pull-out or drop-down changing surfaces, and may provide storage for diapers and diaper products.

3.1.7 *changing table accessory*—an accessory that attaches to a crib or play yard designed to convert the product into a changing table typically having a rigid frame with soft fabric or mesh sides or bottom surface, or both.

3.1.8 *conspicuous, adj*—visible when the changing product is in any manufacturer's recommended use position, to a person in a position normally associated with the task of changing a child's diaper.

3.1.9 *contoured changing pad, n*—a changing pad designed for use on an elevated surface which incorporates barriers to prevent a child from rolling off the changing surface.

3.1.10 *double action release mechanism, system, n*—~~a release mechanism that requires requiring~~ either two consecutive actions, the first of which must be maintained while the second is carried out, or two separate and independent ~~single action locking mechanisms that must be activated simultaneously simultaneous actions~~ to fully release.

3.1.11 *key structural elements, n*—side assemblies, end assemblies, base assemblies, leg assemblies, primary changing surface supports, or other components designed to support the weight of the occupant, or a combination thereof (see Fig. 1).

3.1.12 *manufacturer's recommended use position(s), n*—any position that is presented as a normal, allowable, or acceptable configuration for the use of the product as a diaper changer by the manufacturer in any descriptive or instructional literature. This specifically excludes positions that the manufacturer shows in a like manner in its literature to be unacceptable, unsafe, or not recommended.

3.1.13 *non-paper label, n*—any label (material such as plastic or metal) which either will not tear without the aid of tools, or tears leaving a sharp defined edge.

3.1.14 *paper label, n*—any label material that tears without the aid of tools and leaves a fibrous edge.

3.1.15 *protective component, n*—any component used for protection from sharp edges, points, or entrapment of fingers or toes.

<sup>3</sup> Available from U.S. Consumer Product Safety Commission (CPSC), Washington, D.C. 20207, website: [www.cpsc.gov](http://www.cpsc.gov).

<sup>4</sup> Available from American National Standards Institute (ANSI), 25 W. 43rd St., 4th Floor, New York, NY 10036, <http://www.ansi.org>.

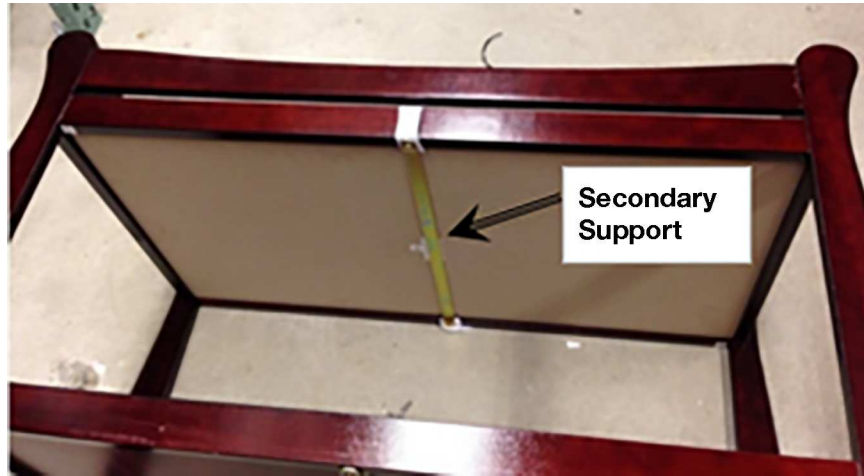


FIG. 1 Example of Secondary Support Component

3.1.15.1 *Discussion*—

Examples of protective components include caps, sleeves, and plugs.

3.1.16 *secondary support component, n*—a strap, bar, rod, or other component that is consumer installed and provides added support, to the changing surface of the changing table.

3.1.17 *self-folding steps, n*—steps which must be held open by an adult caregiver that, when released, fold away and latch automatically into their normally closed position.

3.1.18 *support surface, n*—a surface to which a changing pad, changing table accessory, or add-on changing unit may be mounted according to manufacturer’s instructions.

3.1.19 *threaded fastener, n*—a discrete piece of hardware that has internal or external screw threads which is used for the assembly of multiple parts and facilitates disassembly.

**4. Calibration and Standardization**

4.1 All testing shall be conducted on a concrete floor, which may be covered with 1/8-in. (3-mm) thick vinyl flooring cover, unless test instructs differently.

4.2 Unless otherwise noted, the product shall be completely assembled in accordance with the manufacturer’s instructions, including any pad supplied by the manufacturer or pad the manufacturer requires, for product to be used as a changing table.

4.3 No testing shall be conducted within 48 h of manufacturing.

4.4 The product to be tested shall be placed in a room with ambient temperature of 73 ± 9°F (23 ± 5°C) for at least 1 h prior to testing. Testing shall then be conducted within this temperature range.

4.5 All testing required by this specification shall be conducted on the same unit.

**5. General Requirements**

5.1 *Sharp Points and Edges*—There shall be no hazardous sharp points or sharp edges as defined by 16 CFR 1500.48 and 16 CFR 1500.49 before and after testing to this specification.

5.2 *Small Parts*—There shall be no small parts as defined by 16 CFR 1501 before testing or liberated as a result of testing to this specification.

5.3 *Surface Coatings*—The paint or surface coating on the product shall comply with 16 CFR 1303.

5.4 *Wood Parts*—Prior to testing, any exposed wood parts shall be smooth and free from splinters.

5.5 *Openings*—Holes or slots that extend entirely through a wall section of any rigid material less than 0.375-in. (9.53-mm) thick and admit a 0.210-in. (5.33-mm) diameter rod shall also admit a 0.375-in. (9.53-mm) diameter rod. Holes or slots that are between 0.210 in. (5.33 mm) and 0.375 in. (9.53 mm) and have a wall thickness less than 0.375 in. (9.53 mm) but are limited in depth to 0.375-in. (9.53-mm) maximum by another rigid surface shall be permissible (see Fig. 2). The product shall be evaluated in all manufacturer’s use positions.

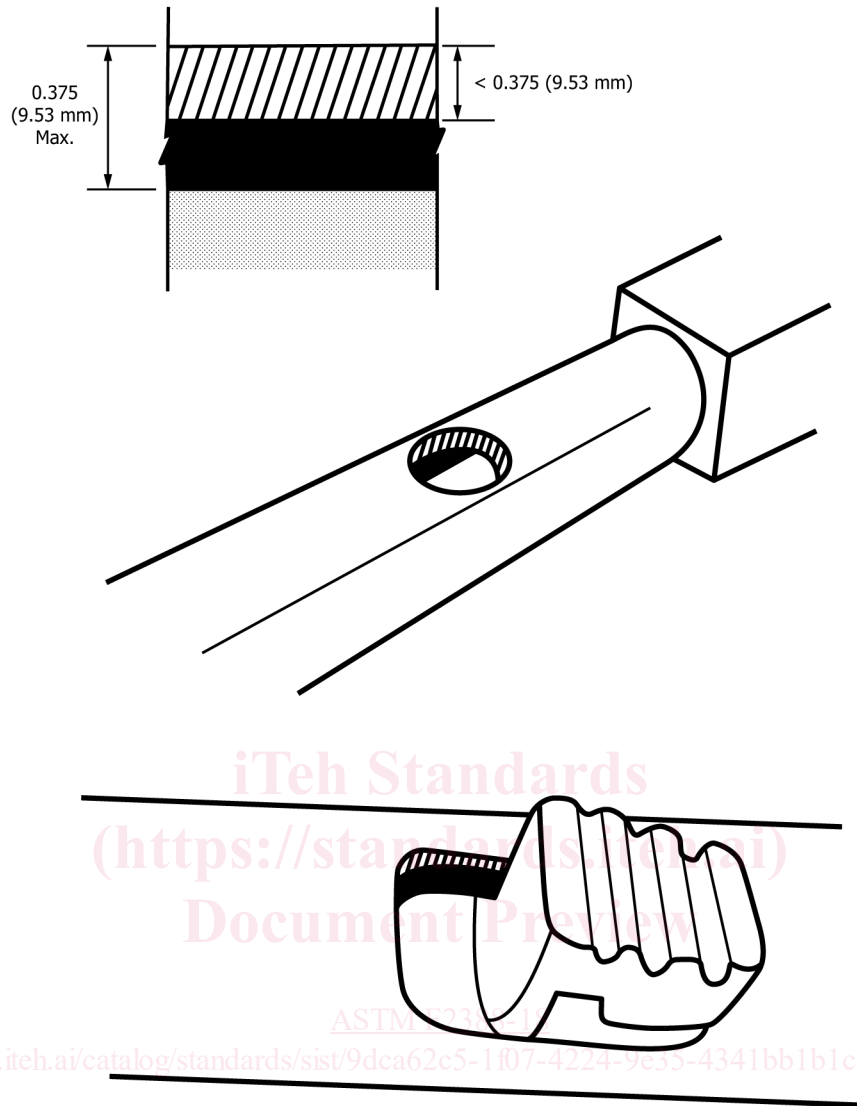


FIG. 2 Opening Examples

5.6 A changing table accessory, when attached in the manufacturer’s recommended use position to a full-size crib or non-full-size crib/play yard, shall conform to the requirements of this specification and the applicable requirements of Consumer Safety Specification **F1169** or **F406**, respectively.

5.7 Toys—Toy accessories attached to, removable from, or sold with a changing product, as well as their means of attachment, must meet applicable requirements of Consumer Safety Specification **F963**.

5.8 Threaded Fasteners:

5.8.1 Wood Screws and Sheet Metal Screws:

5.8.1.1 No changing table shall require consumer assembly of key structural elements using wood screws or sheet metal fasteners directly into wood components. This shall not apply to non-key structural elements such as drawers, secondary support components, other storage components, accessory items and the fasteners used for attaching contoured pads and add-on changing units to other supporting furniture. This shall also not apply to the fasteners used for changing tables which are also clothing storage units which fall under the scope of Safety Specification **F2057**.

5.8.2 Metal inserts, with external wood screw threads for screwing into a wood component and providing internal machine threads to accommodate a machine screw, that are used to secure key structural elements shall be glued or include other means to impede loosening or detaching.

5.8.3 Metal threaded fasteners, such as sheet metal screws and machine screws, secured into metal components and used to attach key structural elements shall have lock washers, self-locking nuts, or other means to impede loosening as defined in **6:26.1** or detachment during the testing required by this specification.

15 lbf (67N) MAX TENSION

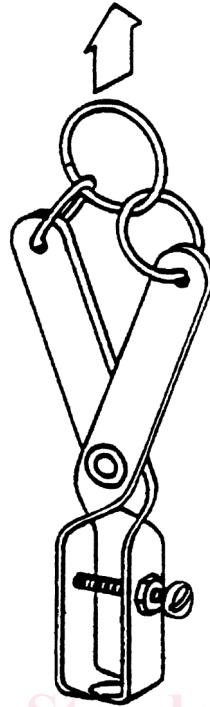


FIG. 3 Tension Test Clamp

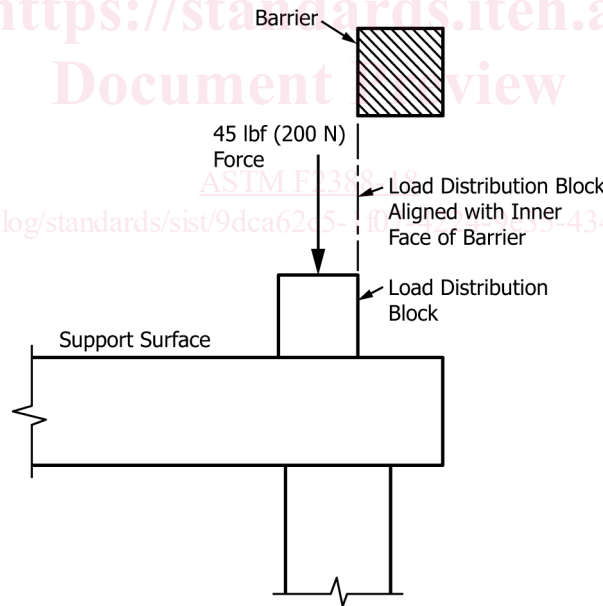


FIG. 4 Stability Test

5.9 Protective Components—If the child can grasp protective components between the thumb and forefinger, or teeth, or if there is at least a 0.04-in. (1.0-mm) gap between the protective component and its adjacent parent component, such component shall not be removed when tested in accordance with 7.1. All protective components that are accessible to a child in/on the product or accessible to a child from any position around the product shall be evaluated.

5.10 Product must comply with the applicable requirements of the Consumer Product Safety Improvement Act.

5.11 Scissoring, Shearing, and Pinching—The product, when in the manufacturer’s recommended use position(s), shall be designed and constructed to prevent injury to the occupant from any scissoring, shearing, or pinching when members or components rotate about a common axis or fastening point, slide, pivot, fold, or otherwise move relative to one another. Scissoring,

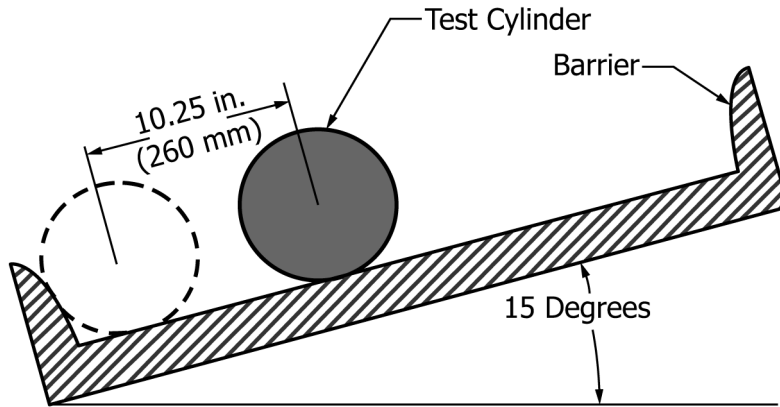
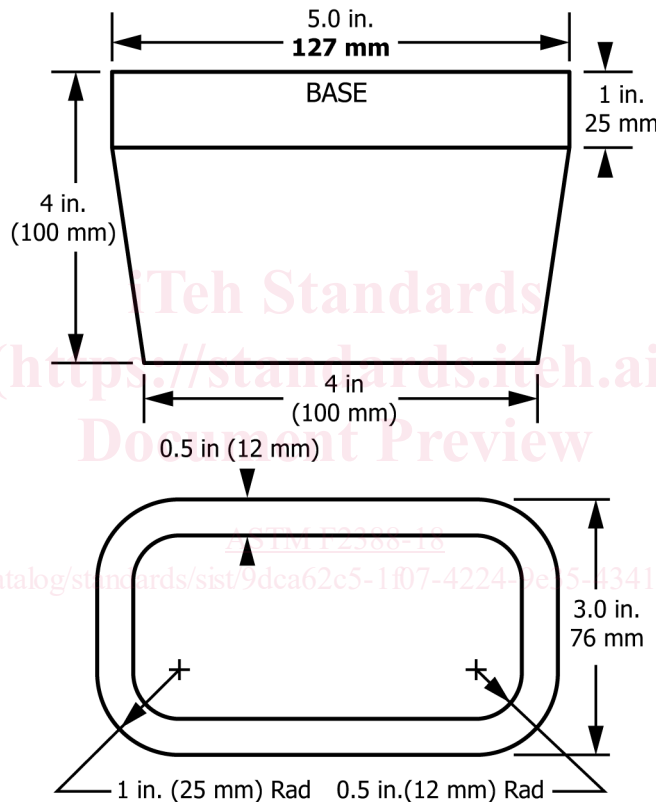


FIG. 5 Barrier Retention Test



Material: Any rigid Material

FIG. 6 Torso Probe

shearing, or pinching that may cause injury exists when the edges of the rigid parts admit a probe greater than 0.210 in. (5.33 mm) and less than 0.375 in. (9.53 mm) in diameter at any accessible point throughout the range of motion of such parts.

5.12 If the changing product can be converted into another product for which a consumer safety specification exists, the product shall comply with the applicable requirements of that standard when in that use mode.

## 6. Performance Requirements

6.1 *Protective Components*—If a child can grasp protective components between the thumb and forefinger, or teeth, such as caps, sleeves, or plugs used for protection from sharp edges, points, or entrapment of fingers or toes, or if there is at least a 0.040-in. (1.00-mm) gap between the protective component and its adjacent parent component, such protective component shall not be removed when tested in accordance with 7.1.