



May 22, 2019

Dear Members of the New York State Senate and Assembly,

The undersigned consumer organizations strongly urge you to vote in favor of [S.3788-A](#) / [A.217-A](#) to prohibit the sale of crib bumper pads and ban their use in child care facilities.

Crib bumper pads are an unnecessary decorative item for cribs that offer no protection from serious injury. No research shows that crib bumper pads serve an injury prevention purpose, yet data does show that they have been linked to dozens of infant injuries and deaths as a result of suffocation and strangulation.<sup>1</sup> Bumpers both create a risk of mechanical suffocation and reduce the airflow in the crib, increasing the risk of Sudden Unexpected Infant Death (SUID).<sup>2</sup> Crib bumpers were responsible for at least 48 infant deaths from 1985 to 2012.<sup>3</sup> Child care regulations already warn against the use of crib bumper pads in New York child care facilities because of the suffocation risk.

The American Academy of Pediatrics (AAP) attributes increased risk of suffocation and SUID to soft bedding used in cribs, and due to mandatory standards that reduce the space between crib slats, AAP states that crib bumpers are not necessary to prevent head entrapment.<sup>4</sup> Crib bumpers can also put babies at risk of entrapment.<sup>5</sup> While the U.S. Consumer Product Safety Commission (CPSC) has acknowledged the dangers of bumpers by recommending that parents and caregivers stop using padded bumpers, the CPSC stopped short of enacting a nationwide ban.<sup>6</sup>

These statistics and reports of fatalities have prompted state and local governments in places like Maryland, Ohio, and Chicago, Illinois, to ban the use of crib bumper pads. Most major retailers have stopped selling padded bumper pads. Still, crib bumper pads are available for sale online and at some outlets in states like New York, where many infants remain at risk for suffocation and strangulation.

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<sup>1</sup> Scheers, Nj, et al. "Crib Bumpers Continue to Cause Infant Deaths: A Need for a New Preventive Approach." The Journal of Pediatrics, Vol 169 (Feb. 2016). Accessed at [www.jpeds.com/article/S0022-3476\(15\)01284-6/fulltext](http://www.jpeds.com/article/S0022-3476(15)01284-6/fulltext).

<sup>2</sup> AAP Task Force on Sudden Infant Death Syndrome. SIDS and Other Sleep-Related Infant Deaths: Updated 2016 Recommendations for a Safe Infant Sleeping Environment. Pediatrics. 2016;138(5):e20162938 (online at [pediatrics.aappublications.org/content/pediatrics/early/2016/10/20/peds.2016-2938.full.pdf](http://pediatrics.aappublications.org/content/pediatrics/early/2016/10/20/peds.2016-2938.full.pdf)).

<sup>3</sup> See note 1.

<sup>4</sup> See note 2.

<sup>5</sup> See note 2.

<sup>6</sup> See American Academy of Pediatrics, et al., "CPSC Fails to Ban Crib Bumpers Dangerous to Infants" (Nov. 4, 2016) (online at [www.aap.org/en-us/about-the-aap/aap-press-room/Pages/CPSC-Fails-to-Ban-Crib-Bumpers-Dangerous-to-Infants.aspx](http://www.aap.org/en-us/about-the-aap/aap-press-room/Pages/CPSC-Fails-to-Ban-Crib-Bumpers-Dangerous-to-Infants.aspx)).

New York should be proactive and follow Maryland, Ohio, and Chicago to enact a ban on crib bumper pads. Babies sleep safest in a bare crib, bassinet, or play yard on their backs.<sup>7</sup> Bumper pads should be removed from the sleep space to prevent the risk of suffocation or SUID. These firm sleep surfaces are the only places that babies are intended to spend time unattended, and our organizations want to eliminate all dangerous products from infants' sleep space, beginning with padded crib bumper pads. While the current New York State bills would only ban padded crib bumper pads, our organizations recommend parents avoid all crib bumper pads, including mesh liners.

We strongly urge you to vote in favor of S.3788-A / A.217-A. If you have any questions about the bills or would like more information, please contact any of the organizations below.

Sincerely,

Nancy Cowles, Executive Director  
Kids In Danger | 312-595-0649

Rachel Weintraub, Legislative Director and General Counsel  
Consumer Federation of America | 202-939-1012

William Wallace, Manager, Home and Safety Policy  
Consumer Reports | 202-462-6262

*Kids In Danger (KID) is a nonprofit organization dedicated to protecting children by fighting for product safety. KID was founded in 1998 by the parents of sixteen-month-old Danny Keysar who died in his Chicago childcare home when a portable crib collapsed around his neck. [www.KidsInDanger.org](http://www.KidsInDanger.org)*

*The Consumer Federation of America is a nonprofit association of nearly 300 consumer groups that, since 1968, has sought to advance the consumer interest through research, advocacy, and education. [www.consumerfed.org](http://www.consumerfed.org)*

*Consumer Reports is an independent, nonprofit membership organization that works side by side with consumers to create a fairer, safer, and healthier world. For 83 years, CR has provided evidence-based product testing and ratings, rigorous research, hard-hitting investigative journalism, public education, and steadfast policy action on behalf of consumers' interests. Unconstrained by advertising or other commercial influences, CR has exposed landmark public health and safety issues and strives to be a catalyst for pro-consumer changes in the marketplace. From championing responsible auto safety standards, to winning food and water protections, to enhancing healthcare quality, to fighting back against predatory lenders in the financial markets, Consumer Reports has always been on the front lines, raising the voices of consumers. [www.consumerreports.org](http://www.consumerreports.org)*

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<sup>7</sup> Moon, Rachel Y., MD, FAAP, "How to Keep Your Sleeping Baby Safe: AAP Policy Explained," HealthyChildren.org from the American Academy of Pediatrics (Apr. 15, 2019) (online at [www.healthychildren.org/English/ages-stages/baby/sleep/Pages/A-Parents-Guide-to-Safe-Sleep.aspx](http://www.healthychildren.org/English/ages-stages/baby/sleep/Pages/A-Parents-Guide-to-Safe-Sleep.aspx)).