TESTING REQUIREMENTS: STORAGE FURNITURE

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MAJOR UPDATES TO ASTM F2057-23

Standard covers children up to 72 months – change from up to and including 5 years of age

Term nightstand removed from exemption list. Scope updated to include specific attributes: free-standing clothing storage units, including but not limited to chests, chests of drawers, drawer chests, armoires, chifferobes, bureaus, door chests, and dressers

- 27 in. or greater in height and;
- 30 lbs. or greater in mass and;
- 3.2 ft3 or greater of *enclosed* storage space
- If your unit does **not** meet any **one** of these attributes, it is exempt from ASTM F2057-23

SCOPE
STURDY ACT

The overall intended use of the item, as well as the likely perceived use, is used to determine if an item is within the scope of the standard, the item's named may be used for intent, but it is not the only one.

| The manufacturer's intent, if reasonable

| Whether the product is marketed as a CSU

| Whether the product is commonly recognized by consumers as a CSU

Free-standing:

| Does not require permanent attachment to the building

| The anti-tip device is not considered permanent attachment

MAJOR UPDATES TO ASTM F2057-23

Test weight increased from 50 lbs. to 60 lbs. and applied to units with _all available drawers open_ rather than only one drawer opened,

Three new tests developed to simulate real life situations:

- **Simulated Clothing Load** (section 9.2.1): Drawers open and loaded test – 8.5 lbs. per ft3 of volume

- **Simulated Horizontal Dynamic Force** (Section 9.2.2): – 10 lb. horizontal force with all available drawers open

- **Simulated Reaction on Carpet with Child Weight** (Section 9.2.3): – unit tilted forward using a 0.43 in. test block and 60 lbs. applied to open drawers

MAJOR UPDATES TO ASTM F2057-23

Interlock drawer integrity test – 30 lb. horizontal force test

Compliance with ASTM F3069-23 – test force increased to 60 lbs. to mirror ASTM 2057-23

Label changes and location requirements

l 0.5" or less from top of drawer side and 3" or less from the back of the drawer front.

l On an open door or on the cabinet side adjacent to the door no more than 1" from door closed position

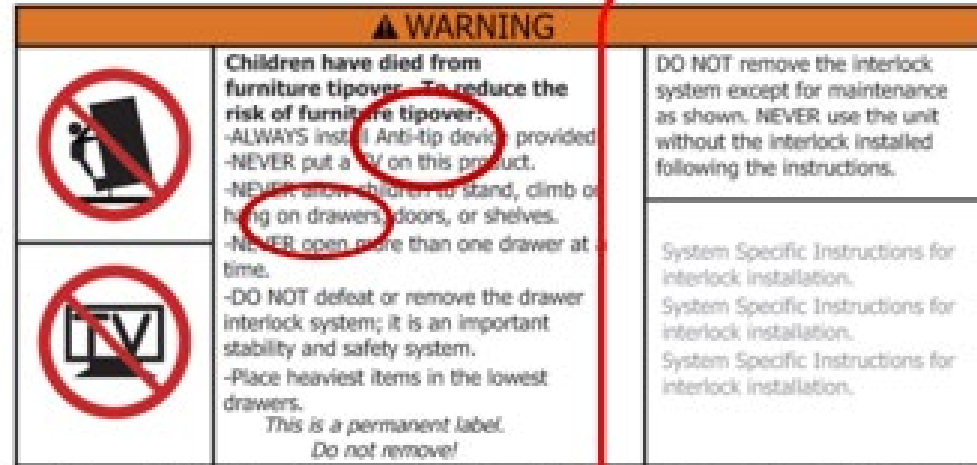# ASTM F2057-23 LABEL REQUIREMENTS

FIG. 19 Example Warning Billboarded for Use with Interlocks Requiring in Unit Warnings

Two oversights are noted on some of the example warnings:

- "Anti-tip device" should be "anti-tip device" (10.2.3.3)

- "..hang on drawers, doors.." should be "hang on any drawers, doors.." (10.2.3.5)

CPSIA LEAD REQUIREMENT

Coatings: 16 CFR 1303

- Coatings on children's products, **furniture** (adult's and children's), wet paint
- 90 ppm total lead limit
- Test method**:** CPSC-CH-E1003-09.1
- Mandatory third party testing by a CPSC registered lab for children's products/furniture

CPSIA LEAD REQUIREMENTS

Substrates 16 CFR 1252

| Accessible materials on children's products

| 100 ppm total lead limit

| Test method: Non-metal: CPSC-CH-E1002-08.3 / Metal: CPSC-CH-E1001-08.3

| Exempted materials

| Materials listed in 16 CFR 1500.91 (d) & (e): such as wood (not composite), textiles, (excluding after treatment applications) and plant and animal-based materials, for detailed list, please refer to https://www.ecfr.gov/current/title-16/chapter-II/subchapter-C/part-1500/section-1500.91

| Textiles are exempt from testing and certification, but not exempt from compliance.

| Inaccessible materials

- After normal and reasonable foreseeable use and abuse

- Coatings and electroplating are not considered barriers

- Fabric is not a barrier for mouthable components (one dimension less than 5 cm)

COMPONENT PART TESTING

A Component Part is part of a product that may be tested separately from the product

l Buttons, wet paints, spray sampling, knobs, screws, hinges

Voluntary, but if relied upon then must meet requirements of 16 CFR 1107

Component part certifier has same responsibilities of a manufacturer

l Third party certification testing
l Third party periodic testing
l Production testing
l Recordkeeping

Component part must be traceable back to the party who tested it

Certifiers and testing parties in possession of the part must exercise due care to prevent contamination.

l Due care does not permit willful ignorance

PERIODIC TESTING PLAN AND REPRESENTATIVE SAMPLING

CPSIA requires periodic testing of children's products

| Plan must define testing frequency and testing quantity to provide a High Degree of Assurance (HDoA) of compliance

| CPSC defined no minimum sample size, but did say periodic testing must be conducted at least once per year; 2 years with in house testing; 3 years with ISO certified in house testing

| Samples must be representative of the production population

Based on several factors including:

| Lot size
| Risk to the user if nonconforming
| Variability between produced units
| Quality systems at the manufacturing site

https://www.cpsc.gov/Business--Manufacturing/Testing-Certification/Third-Party-Tes

CALIFORNIA PROPOSITION 65

Storage Furniture Settlements

| Storage furniture
  | For children 12 years old and younger shall not exceed 100 ppm total lead.
  | Products not primarily intended for children 12 years old and younger shall not exceed 300 ppm total lead
  | Plastics and coatings shall not contain more than 0.1% (1000 ppm) of each of DEHP, BBP, DBP

| Upholstered furniture
  | Plastics and coatings shall not contain more than 0.1% (1000 ppm) of each of the following phthalates
  | DEHP, BBP, DBP, DINP, DIDP and DnHP.
  | All accessible and inaccessible polyurethane foam shall not contain any detectable (BV reporting limits are 5 mg/kg) level of:
    - *Tris(2-chloroethyl) phosphate (TCEP),*
    - *Tris(2,3-dibromopropyl)phosphate (TRIS),*
    - *Tris(1,3-dichloro-2-propyl) phosphate (TDCPP)*

TESTING REQUIREMENTS

CLOTHING STORAGE UNITS

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