

May 8, 2025

The Honorable Russell T. Vought
Director
Office of Management and Budget
1650 17th Street NW
Washington, DC 20006

Dear Director Vought,

We write to strongly oppose any attempt to eliminate, defund, or weaken the Consumer Product Safety Commission (CPSC). Instead, this critical agency should be significantly strengthened and remain independent and bipartisan.

The CPSC is an independent federal agency commissioned by Congress to protect the public from unreasonable risks of injury or death from consumer products through education, safety standards, regulation, and enforcement.¹ This small agency with a big mission has had lifesaving effects. CPSC standards and enforcement activities have helped spur a 43 percent decline in residential fires, a 47 percent decrease in fire deaths, and a 41 percent reduction in fire injuries.² Child poisonings have decreased by 80 percent.³ Bicycle injuries dropped by 35 percent.⁴ Deaths from refrigerator door entrapments and garage door incidents have been virtually eliminated.⁵ Crib deaths have plummeted by 80 percent.⁶ Injuries associated with baby walkers have been slashed by 88 percent.⁷ Pool and pool equipment injury rates have decreased by 55 percent.⁸

According to a draft budget document, the Trump administration is finalizing a proposal to eliminate the CPSC and transfer the agency's functions to the Department of Health and Human Services (HHS).⁹ This HHS budget request for Fiscal Year 2026 would scrap the CPSC and states that a new, currently nonexistent staff division within HHS would absorb functions and staff from the CPSC.¹⁰

¹ Consumer Product Safety Commission. "About Us." www.cpsc.gov/About-CPSC. Accessed 14 March 2025.

² Consumer Product Safety Commission. "CPSC Celebrates 50 Years of Making Consumer Safety our Mission. 15, March 2022, www.cpsc.gov/Newsroom/News-Releases/2022/CPSC-Celebrates-50-Years-of-Making-Consumer-Safety-our-Mission.

³ Consumer Product Safety Commission. "CPSC Celebrates 50 Years of Making Consumer Safety our Mission. 15, March 2022, www.cpsc.gov/Newsroom/News-Releases/2022/CPSC-Celebrates-50-Years-of-Making-Consumer-Safety-our-Mission.

⁴ *Id.*

⁵ *Id.*

⁶ *Id.*

⁷ *Id.*

⁸ *Id.*

⁹ Sun, Lena H., et al. "Internal Budget Document Reveals Extent of Trump's Proposed Health Cuts." *The Washington Post*, 16 April 2025. www.washingtonpost.com/health/2025/04/16/hhs-budget-cut-trump/; Faust, Jeremy. "New: A 64-page HHS restructuring proposal outlines sweeping cuts to US public health." *Inside Medicine*, 16 April 2025.

¹⁰ *Id.*

If implemented, this proposal would eradicate – not reorganize – our nation’s governance of product safety. Over its fifty-year existence, the CPSC has developed a body of safety standards, enforcement actions, consumer education campaigns, data collection initiatives, and recall processes, none of which can be “transferred” by executive authority to a new agency.¹¹ If this proposal were carried out, safety standards – such as those preventing fires, lacerations, poisonings, suffocation, drowning, entrapment, and crushing – may no longer be in effect. Consumer products, including those imported from overseas, may no longer be inspected by federal regulators for safety threats. Sellers may no longer be obligated to recall dangerous, violative products. Critical product safety research may no longer be performed. Vital product safety information and data may no longer be public. That includes data essential for addressing hazardous household products, motor vehicle crashes, adverse drug effects, aviation incidents, and work-related injuries.

HHS lacks the clear statutory authority to establish safety standards, enforcement actions, consumer education campaigns, data collection, and recall processes for consumer products that would be necessary to “continue carrying out CPSC’s mission...”. The CPSC, not HHS, has explicit jurisdiction over consumer product safety.¹² Any effort to use HHS’s existing authorities to replicate CPSC activities would be vulnerable to legal challenge, potentially leaving a regulatory black hole by which dangerous consumer products can freely enter the stream of commerce. Further, even if Congress were to approve the absorption of the CPSC into HHS, replicating the CPSC’s activities would likely require several cumbersome rulemakings, which could take years to complete, if ever finalized.

HHS is not well suited to oversee household product safety. The agency already has a vast mission, which includes food and drug regulation, communicable disease prevention, public health emergency preparation and response, medical research, and administration of Medicare, Medicaid, and the Children’s Health Insurance Program.¹³ Product safety could all too easily take a back seat. Competition with other deserving programs could result in less funding for consumer product safety. Competing agency priorities could result in a lack of vigorous standard setting, oversight, and enforcement.

Congress deliberately established an independent agency exclusively charged with the safety of consumer products. Such independence ensures that product safety issues are treated like the public safety imperative they so clearly are. Approximately 49,000 product-related

¹¹ 15 U.S.C. Chapter 47; 16 CFR Chapter II.

¹² 15 U.S.C. Chapter 47

¹³ Congressional Research Service. “Department of Health and Human Services: FY 2025 Budget Request.” 23 May 2024. www.congress.gov/crs-product/R48060.

deaths and 34 million product-related injuries occur each year.¹⁴ Consumer product incidents account for \$1 trillion in costs to society each year.¹⁵

We urge you to preserve an independent, bipartisan CPSC and ensure the agency has the appropriate tools, resources, and personnel to carry out its lifesaving mission. The CPSC protects the health and safety of the American people – especially babies, children, and older Americans – and creates clear rules of the road for manufacturers, retailers, and distributors. It ensures that safety is ingrained in the design and manufacturing of each product, giving companies assurance that they can make money while fulfilling their obligation to protect their customers.

We thank you for your attention to this important matter.

Sincerely,

National Consumers League

Consumer Reports

Access Ready Inc.

Action on Smoking and Health

Aden Lamps Foundation

Advocates for Highway and Auto Safety

Aging Life Care Association

America Walks

American Academy of Pediatrics

American Apparel & Footwear Association

Appliance Standards Awareness Project

Autistic Self Advocacy Network

Bicycle Alliance of Minnesota

Bicycle Coalition of Greater Philadelphia

Consumer Federation of America

Bicycle Colorado

Bike Cleveland

Bike Jeffco

Bike LA

Bike Oven

Bike Pittsburgh

Bike Walk Savannah

BikeWalkKC

BikeWalkNC

BioInjury

Breast Cancer Prevention Partners

California Bicycle Coalition

Center for Auto Safety

¹⁴ Consumer Product Safety Commission. “Consumer Product-Related Injuries and Deaths in the United States: Estimated Injuries Occurring in 2020 and Estimated Deaths Occurring in 2019.” September 2021. <https://www.cpsc.gov/s3fs-public/ConsumerProductRelatedInjuriesandDeathsInTheUnitedStates.pdf?VersionId=bPIYVZJhOwvBRyFm2vIm0O36tN7P0AKm>.

¹⁵ Consumer Product Safety Commission. “Strategic Plan 2018-2022.” https://www.cpsc.gov/s3fs-public/CPSC_2018-2022_Strategic_Plan.pdf. Accessed 15 March 2025.

Center for Economic Integrity	Hackensack Meridian Health
Center for Economic Justice	Haddie's Calling
Center for Medicare Advocacy	Hawai'i Bicycling League
Center for Pet Safety	Healthy Babies Bright Futures
Charlie's House	HealthyWomen
Child Care Aware of Virginia	Homestretch Nonprofit Housing Corp.
ChildSavers	Human Powered Solutions LLC
Citizens Action Coalition of IN	Impact Teen Drivers
Claire Bear Foundation	Jacob Bikes
CommunicationFIRST	Joseph A Sanzari Children's Hospital
Consumer Action	Just Strategy
Consumers for Auto Reliability and Safety	Keeping Babies Safe
Cribs for Kids	Kids and Car Safety
Derrick Stone Safe Sleep	La Isla Network
Detroit Greenways Coalition	Lead on Solutions, LLC
Disability Rights Education and Defense Fund (DREDF)	League of American Bicyclists
Diversity In Aquatics	Living Streets Alliance
Earth Ethics, Inc.	Local Motion
East Coast Greenway Alliance	Madison Bikes, Inc.
Economic Action Maryland Fund	Marin County Bicycle Coalition
Epilepsy Foundation of America	MassBike
Families for Safe Streets	Missourians for Responsible Transportation
First Candle	Move Redmond
Florida Bicycle Association	Muscular Dystrophy Association
Florida Silver Haired Legislature Inc	Napa County Bicycle Coalition
Friends of the Concord-Lake Sunapee Rail Trail	National Association of Consumer Advocates
Funeral Consumers Alliance of South Carolina	National Bicycle Dealers Association
Georgia Watch	National Carbon Monoxide Awareness Association
Government Information Watch	National Center for Healthy Housing

National Coalition for Safer Roads
 National Drowning Prevention Alliance
 New Jersey Bike & Walk Coalition
 Oregon Consumer Justice
 Oregon Consumer League
 Parents Against Tip-Overs
 Parents for Window Blind Safety
 Paterson Task Force for Community Action, Inc.
 Pennsylvania Downtown Center
 People Power United
 Pool and Hot Tub Alliance
 Propel ATL
 Public Citizen
 Reconnect Rochester
 Ride Illinois
 Ride of Silence
 Safe Infant Sleep
 Safety Research & Strategies
 Sciencecorps
 Shane's Foundation, NFP
 Shepard's Watch Foundation
 Sonoma County Bicycle Coalition
 South Carolina Appleseed Legal Justice Center
 Stop Drowning Now
 StopDistractions.org
 SwimJim
 Tempe Bicycle Action Group
 The Center for Science in the Public Interest
 (CSP)
 The National Carbon Monoxide Awareness
 Association

Transportation Alternatives
 Travel Goods Association (TGA)
 Truck Safety Coalition
 United States Swim School Association
 Unleaded Kids
 Virginia Citizens Consumer Council
 Vision 2020 Project
 Walk 'n Rollers
 Washington Area Bicyclist Association
 Whirlwind Wheelchair International
 Wisconsin Bike Fed
 Yakima Bikes and Walks!
 Alissa K. Sandler, Product Safety Advocate
 Angela Williams, Product Safety Advocate
 Ashley Haugen, That Water Bead Lady
 Cindy Mense, Product Safety Advocate
 Dr. Free N. Hess, Product Safety Advocate
 Elizabeth Hemmerlin, Product Safety Advocate
 Ernest Bach, Product Safety Advocate
 Garrett Kellermab, Product Safety Advocate
 Heather Stephens, Product Safety Advocate
 Heidi Perry, Product Safety Advocate
 Janet McGee, Parent Product Safety Advocate
 Jayshree Kumta, Product Safety Advocate
 Judith Solomon, Product Safety Advocate
 Kelley Ladick, Product Safety Advocate
 Lori Winkler, MSN, RN, TNS, CPEN, Product
 Safety Advocate
 Marjon Manitius, Product Safety Advocate
 Marjorie Murray, Product Safety Advocate

Mary Jagim, Product Safety Advocate
Michael Haggard, Product Safety Advocate
Pamela Gilbert, National Consumers League
Board Member
Paul Susca, Product Safety Advocate
Robert W Browne, Product Safety Advocate
Sandeep Khatua, Product Safety Advocate

Sarah Sorscher, Product Safety Advocate
Sara Thompson, Parent Safety Advocate
Shayna Raphael, Product Safety Advocate
Stephen W Hargarten, Product Safety Advocate
Taylor Bethard, That Water Bead Lady &
Esther's Mom

Cc: Hon. Robert F. Kennedy, Jr., Secretary of the Department of Health and Human Services
Hon. Peter A. Feldman, Acting Chairman, Consumer Product Safety Commission
Hon. Alexander Hoehn-Saric, Commissioner, Consumer Product Safety Commission
Hon. Richard Trumka, Commissioner, Consumer Product Safety Commission
Hon. Mary T. Boyle, Commissioner, Consumer Product Safety Commission
Hon. Douglas Dziak, Commissioner, Consumer Product Safety Commission