

Comments regarding
Consultation on proposed updates to the danger to human health or safety assessment for
free-standing clothing storage units
Submitted on November 4, 2025

On behalf of Parents Against Tip-overs, American Home Furnishings Alliance, Consumer Reports, Consumer Federation of America, & National Consumers League we welcome the opportunity to comment on Health Canada's proposal to update the General Prohibition Table 3 entry for free-standing clothing storage units to reflect the requirements of ASTM F2057-23, Standard Safety Specification for Clothing Storage Units.

As several of our organizations are ASTM International voting members, we participated in the development of the ASTM 2057-23 standard, whose requirements were adopted as part of a mandatory rule issued by the U.S. Consumer Product Safety Commission (CPSC) under the Stop Tip-Over of Unstable Risky Dressers on Youth (STURDY) Act. We agree with Health Canada's determination that ASTM F2057-23 provides an important increase in protection against tip-overs for Canadian children over a much wider age group compared to ASTM F2057-19, and we strongly urge Health Canada to strengthen the performance criteria for CSUs to reflect the up-to-date requirements of ASTM F2057.

For nearly three decades, furniture tip-over injuries and fatalities have been identified as a significant product hazard in both the U.S. and Canada. According to the CPSC's most recent epidemiological report on tip-over injuries and deaths, at least 608 people were killed in tip-over incidents between 2000 and 2022. Although tip-over incidents affect people of all ages, the vast majority of furniture tip-over fatalities involve young children. The CPSC estimates that, on average, 17,800 tip-over related injuries are treated at U.S. emergency rooms annually (approximately 24 people every day). It is also believed that many furniture tip-overs and "near misses" go unreported to the agency. Health Canada's own data indicates that there is a danger to human health and safety posed by CSUs that do not, at a minimum, meet the requirements of ASTM F2057-23. In line with the stated purpose of the Canada Consumer Product Safety Act (CCPSA), to "protect the public by addressing or preventing dangers to human health or safety that are posed by consumer products in Canada, including those that circulate within Canada and those that are imported," Health Canada should swiftly revise its free-standing CSU requirements to reflect the latest version of ASTM F2057.

In order to pass the STURDY Act through the U.S. Congress, parent advocates, furniture manufacturers, consumer safety organizations, trade associations, and retailers worked together to develop federal legislation that would save lives, prevent injuries, and be widely supported by all stakeholders. In addition to rigorous stability tests that account for real-world use, we developed mandatory warning label language and required that CSUs come with an anti-tip device, sometimes called a furniture anchoring kit. On December 29, 2022, the STURDY Act was signed into federal law. On April 19, 2023, the CPSC adopted the performance requirements of ASTM F2057-23 as the mandatory safety and stability standard

for CSUs made or sold in the U.S., and on September 1, 2023, this mandatory standard went into effect.

The passage and implementation of the STURDY Act was the result of decades of work by parents and consumer advocates, as well as engineering expertise, analysis, discussion, and collaboration with furniture industry organizations. Many tip-over victim parents believe that if this standard were in place at the time their children's dressers were manufactured, it might have saved their children's lives.

While consensus in federal rulemaking is often difficult to achieve, the STURDY 'story' in the U.S. involved stakeholders identifying and acknowledging the risks associated with furniture tip-overs, decades of analysis and advocacy work, and ultimately an effective solution reached through compromise. In order to protect Canadians from the deadly risks associated with unstable furniture, our organizations collectively encourage Health Canada to align its furniture stability rule with ASTM F2057-23.

Thank you for your consideration of these comments, co-signed by a parent advocacy group, a furniture trade association, and consumer advocacy organizations. We hope this further signals the collaboration behind the STURDY compromise and our support of ASTM F2057-23 as Health Canada's mandatory safety standard for clothing storage furniture.

