



June 24, 2026

The Honorable Ted Cruz  
Chair  
Committee on Commerce, Science, and  
Transportation  
United States Senate  
Washington, D.C. 20510

The Honorable Maria Cantwell  
Ranking Member  
Committee on Commerce, Science, and  
Transportation  
United States Senate  
Washington, D.C. 20510

Dear Chair Cruz and Ranking Member Cantwell,

The National Consumers League (NCL) respectfully submits this letter for the nominations hearing of Brien Lorenze and Karen Sessions to be Commissioners of the Consumer Product Safety Commission (CPSC).

The CPSC is an independent federal agency commissioned by Congress in 1972 to protect the public from unreasonable risks of injury or death from consumer products through education, safety standards, regulation, and enforcement.<sup>1</sup> 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 from 1980 to 2018.<sup>2</sup> Child poisonings have decreased by 80 percent between 1972 and 2020.<sup>3</sup> Bicycle injuries dropped by 35 percent between 1973 and 2020.<sup>4</sup> Deaths from refrigerator door entrapments and garage door incidents have been virtually eliminated.<sup>5</sup> Crib deaths have plummeted by 80 percent from 1973 to 2018.<sup>6</sup> Pool and pool equipment injury rates have decreased by 55 percent from 1975 to 2019.<sup>7</sup>

We are concerned by the Trump administration's ongoing, unlawful efforts to fire three Democratic CPSC Commissioners. On May 8, 2025, Commissioners Richard Trumka and Mary T. Boyle received an email from the White House purporting to terminate their positions at the CPSC.<sup>8</sup> While Commissioner Alexander Hoehn-Saric did not receive such an email, he is being prevented from executing his duties.<sup>9</sup> This unprecedented action against our nation's

<sup>1</sup> Consumer Product Safety Commission. "About Us." [www.cpsc.gov/About-CPSC](http://www.cpsc.gov/About-CPSC). Accessed 29 April 2026.

<sup>2</sup> 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](http://www.cpsc.gov/Newsroom/News-Releases/2022/CPSC-Celebrates-50-Years-of-Making-Consumer-Safety-our-Mission).

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> Trumka, Richard @TrumkaCPSC. "See you in court, Mr. President." *Twitter*, 9 May 2025, <https://x.com/TrumkaCPSC/status/1920829190208655645>; Hoehn-Saric, Alexander @HoehnSaricCPSC. "President Trump is attempting to illegally remove me from the CPSC. See my statement." *Twitter*, 9 May 2025,

<https://x.com/hoehnsariccpsc/status/1920838496039666092?s=46&t=fFGtPEY2EjySsBua6HhwPg>.

<sup>9</sup> Hoehn-Saric, Alexander @HoehnSaricCPSC. "President Trump is attempting to illegally remove me from the CPSC. See my statement." *Twitter*, 9 May 2025, <https://x.com/hoehnsariccpsc/status/1920838496039666092?s=46&t=fFGtPEY2EjySsBua6HhwPg>.

longstanding watchdog of household product safety is in direct contravention of the letter and spirit of the law, runs afoul of decades of Supreme Court precedent, and threatens to cripple the CPSC's ability to protect the American public from unreasonable risks of injury or death associated with consumer products. Our concern is shared by 100 stakeholders who sent the attached letter to President Trump calling on the administration to cease its illegal attempt to fire the three Democratic CPSC Commissioners.

We urge Congress to preserve an independent, bipartisan CPSC and ensure the agency has the appropriate tools, resources, and personnel to carry out its lifesaving mission. The FY 2027 Department of Health and Human Services' (HHS) budget and FY 2027 CPSC budget recommend that CPSC's functions be transferred to HHS.<sup>10</sup> The CPSC budget also requests \$135 million in funding (a 10 percent cut compared to FY 2025 levels) and 459 employees (a 14 percent reduction compared to FY 2025 levels).<sup>11</sup> NCL and 138 other stakeholders have called on Congress to oppose any attempt to dramatically restructure the CPSC, reduce the agency's workforce, and decrease funding for consumer product safety.<sup>12</sup>

Regrettably, the CPSC recently rescinded guidance and several proposed rules that protect the American people from hazardous household products. On August 20, 2025, the CPSC withdrew four active rulemaking proceedings that mitigate risks posed by table saws, aerosol duster products, and off-highway vehicles.<sup>13</sup> As required by law, each proposed standard and ban was supported by a comprehensive risk assessment, product testing, evaluation of relevant industry standards, review of regulatory alternatives, benefit-cost analysis, and consideration of public comments.<sup>14</sup> Based on thorough regulatory analyses and findings, the proposed standards and bans would save hundreds of lives, prevent tens of thousands of injuries, and generate billions of dollars in benefits to society.<sup>15</sup> A detailed description of the proposed rules is included in the Appendix.

The CPSC also rescinded guidance for estimating the value of a statistical life (VSL), which is a monetary value that represents an individual's willingness to reduce their risk of fatality.<sup>16</sup> The VSL is frequently used in benefit-cost analysis.<sup>17</sup> On April 18, 2024, the CPSC finalized guidance establishing a standard method for estimating VSL and adjusting VSL for

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<sup>10</sup> Department of Health & Human Services. "Fiscal Year 2027 Budget in Brief." <https://www.hhs.gov/about/budget/budget-in-brief/index.html>. Accessed 29 April 2026; Consumer Product Safety Commission. "Performance Budget Request to OMB & Congress Fiscal Year 2027." April 2026. [https://www.cpsc.gov/s3fs-public/FY27\\_Budget.pdf](https://www.cpsc.gov/s3fs-public/FY27_Budget.pdf).

<sup>11</sup> *Id.*

<sup>12</sup> The National Consumers League. "139 Stakeholders Urge Congress to Protect the Consumer Product Safety Commission." May 28, 2026. <https://nclnet.org/139-stakeholders-urge-congress-to-protect-the-consumer-product-safety-commission/>.

<sup>13</sup> Consumer Product Safety Commission. "CPSC Withdraws Rules That Are Outdated, Fail to Advance Safety; New Leadership Focuses on Hazards That Pose Real Risks." August 20, 2025. [www.cpsc.gov/Newsroom/News-Releases/2025/CPSC-Withdraws-Rules-That-Are-Outdated-Fail-to-Advance-Safety-New-Leadership-Focuses-on-Hazards-That-Pose-Real-Risks](http://www.cpsc.gov/Newsroom/News-Releases/2025/CPSC-Withdraws-Rules-That-Are-Outdated-Fail-to-Advance-Safety-New-Leadership-Focuses-on-Hazards-That-Pose-Real-Risks).

<sup>14</sup> Consumer Product Safety Commission. "Rulemaking." <https://www.cpsc.gov/Regulations-Laws--Standards/Rulemaking>. Accessed September 24, 2025.

<sup>15</sup> Consumer Product Safety Commission. "Safety Standard Addressing Blade-Contact Injuries on Table Saws." November 1, 2023. 88 Fed. Reg. 74,909; Consumer Product Safety Commission. "Banned Hazardous Substances: Aerosol Duster Products Containing More Than 18 mg in Any Combination of HFC-152a and/or HFC-134a." July 31, 2024. 89 Fed. Reg. 61363; Consumer Product Safety Commission. "Safety Standard for Recreational Off-Highway Vehicles." November 19, 2014. 79 Fed. Reg. 68964; Consumer Product Safety Commission. "Safety Standard for Debris Penetration Hazards." July 21, 2022. 87 Fed. Reg. 43688.

<sup>16</sup> See note 13; Consumer Product Safety Commission. "Notice of Availability of Final Guidance for Estimating Value per Statistical Life." April 18, 2024. 89 Fed. Reg. 27740.

<sup>17</sup> Consumer Product Safety Commission. "Notice of Availability of Final Guidance for Estimating Value per Statistical Life." April 18, 2024. 89 Fed. Reg. 27740.

inflation, changes in real income, and discounting.<sup>18</sup> Based on sound economics and new research, the CPSC also established a higher VSL for children that appropriately accounts for society's willingness to pay more to protect the life and well-being of our nation's youth.<sup>19</sup>

The CPSC's rationale for rescinding these proposed rules and guidance was relegated to a 411-word press release.<sup>20</sup> The CPSC asserted that the guidance for estimating the VSL "inflates claimed regulatory benefits," presumably the value of protecting a child's life.<sup>21</sup> Further, the agency claimed that the rulemakings "no longer align with agency priorities" and "fail to advance safety."<sup>22</sup> The release further states that the withdrawal "signals a fundamental shift under CPSC's new leadership to focus [on] sound science, robust data, and common sense."<sup>23</sup> Moving forward, the CPSC "will act where mandatory standards are truly necessary and the evidence shows federal intervention will meaningfully advance safety."<sup>24</sup> On September 26, 2025, the CPSC filed a notice in the Federal Register formally withdrawing the rules.<sup>25</sup> The notice justified the rescission by merely stating that "the Commission no longer intends to issue final rules with respect to these proposals."<sup>26</sup>

As mandated by Congress, the CPSC has an obligation to establish standards and bans, guided by economically sound VSL, when reasonably necessary to prevent or reduce an unreasonable risk of injury associated with a consumer product.<sup>27</sup> The record reflects that the withdrawn guidance and proposed rules met that threshold. Withdrawing these proceedings, however, does not appear grounded in evidence or morality.

We respectfully urge the Committee to preserve an independent, bipartisan CPSC and to ensure that the agency has the resources, personnel, and statutory tools necessary to protect consumers from unreasonable risks of injury and death. Thank you for considering our perspective.

Sincerely,



Daniel Greene  
Senior Director of Consumer Protection & Product Safety  
The National Consumers League

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<sup>18</sup> *Id.*

<sup>19</sup> *Id.*

<sup>20</sup> *See* note 13.

<sup>21</sup> *Id.*

<sup>22</sup> *Id.*

<sup>23</sup> *Id.*

<sup>24</sup> *Id.*

<sup>25</sup> Consumer Product Safety Commission. "Withdrawal of Proposed Regulatory Action." September 26, 2025. FR Doc. 2025-18810.

<sup>26</sup> *Id.*

<sup>27</sup> 15 U.S. Code § 2056; 15 U.S. Code § 2057.

## Appendix

On August 20, 2025, the CPSC withdrew four active rulemakings:

- **Table Saw Blade-Contact Injuries** — On November 1, 2023, the CPSC issued a supplemental notice of proposed rulemaking to establish a standard mitigating the risk of blade-contact injuries associated with table saws, which are cutting devices in which a circular saw blade protrudes through a table.<sup>28</sup> The CPSC projects that the rule will prevent or mitigate the severity of an estimated 49,176 injuries per year, producing \$1.28 billion to \$2.32 billion of benefits per year.<sup>29</sup>
- **Aerosol Duster Products** — On July 31, 2024, the CPSC issued a notice of proposed rulemaking to address deaths and injuries associated with harmful propellants used in aerosol duster products.<sup>30</sup> The CPSC is aware of more than 1,000 deaths and 21,700 injuries resulting from the inhalation of aerosol duster products between 2012 and 2021.<sup>31</sup> The proposed rule would ban aerosol duster products that exceed certain concentrations of hazardous compounds, generating an estimated \$1.93 billion in net benefits to society on an annualized basis.<sup>32</sup>
- **Recreational Off-Highway Vehicles** — On November 19, 2014, the CPSC issued a notice of proposed rulemaking to address unreasonable risks of injury and death associated with Recreational Off-Highway Vehicles (ROVs).<sup>33</sup> The CPSC identified 550 ROV-related incidents between 2003 and 2013, which resulted in 231 fatalities and 388 injuries, including degloving, fractures, and crushing injuries.<sup>34</sup> The proposed standard would require a minimum level of rollover resistance and occupant retention, which would have generated approximately \$500 million (in 2013 dollars) per year in net benefits to society.<sup>35</sup>
- **Debris Penetration** — On July 21, 2022, the CPSC issued a notice of proposed rulemaking to establish a standard preventing debris penetration into the occupant area of off-highway vehicles.<sup>36</sup> The CPSC identified 107 debris penetration incidents, which

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<sup>28</sup> Consumer Product Safety Commission. “Safety Standard Addressing Blade-Contact Injuries on Table Saws.” 1 November 2023, 88 Fed. Reg. 74,909.

<sup>29</sup> *Id.*

<sup>30</sup> Consumer Product Safety Commission. “Banned Hazardous Substances: Aerosol Duster Products Containing More Than 18 mg in Any Combination of HFC-152a and/or HFC-134a.” 31 July 2024, 89 Fed. Reg. 61363.

<sup>31</sup> *Id.*

<sup>32</sup> *Id.*

<sup>33</sup> Consumer Product Safety Commission. “Safety Standard for Recreational Off-Highway Vehicles.” 19 November 2014, 79 Fed. Reg. 68964.

<sup>34</sup> *Id.*; Consumer Product Safety Commission. “Standard for Recreational Off-Highway Vehicles.” 28 October 2009, 74 Fed. Reg. 55495.

<sup>35</sup> *See* note 33.

<sup>36</sup> Consumer Product Safety Commission. “Safety Standard for Debris Penetration Hazards.” 21 July 2022, 87 Fed. Reg. 43688.

were responsible for six deaths and 22 injuries.<sup>37</sup> The proposed standard could generate over \$121 million in societal benefits.<sup>38</sup>

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<sup>37</sup> *Id.*

<sup>38</sup> *Id.*

July 22, 2025

The Honorable Donald J. Trump  
President of the United States  
The White House  
1600 Pennsylvania Avenue NW  
Washington, D.C. 20500

Dear President Trump,

On behalf of the undersigned organizations and advocates, we write to implore you to rescind the unlawful attempted removal of the Democratic Commissioners at the Consumer Product Safety Commission (CPSC). On May 8, 2025, Commissioners Richard Trumka and Mary T. Boyle received an email from the White House purporting to terminate their positions at the CPSC.<sup>1</sup> While Commissioner Alexander Hoehn-Saric did not receive such an email, he is being prevented from executing his duties.<sup>2</sup> This unprecedented action against our nation's longstanding watchdog of household product safety is in direct contravention of the letter and spirit of the law, runs afoul of decades of Supreme Court precedent, and threatens to cripple the CPSC's ability to protect the American public from unreasonable risks of injury or death associated with consumer products.

During the Nixon administration, Congress established the CPSC as an independent federal agency led by five bipartisan Commissioners exclusively charged with overseeing the safety of household consumer products. Since then, members of Congress from both parties have supported the role of an independent, bipartisan CPSC. By law, CPSC Commissioners must be mission-driven and subject matter experts with a "background and expertise in areas related to consumer products and protection of the public from risks to safety."<sup>3</sup> No more than three of the Commissioners can be affiliated with the same political party and Commissioners may only be removed by the President "for neglect of duty or malfeasance in office but for no other cause."<sup>4</sup>

The statutory threshold for removal has not been satisfied. All three fired Commissioners have faithfully fulfilled their lawful duties to save lives and prevent injuries. During the Biden administration, the CPSC finalized over fifty vital product safety rules and standards, including banning crib bumpers and establishing standards for adult portable bed rails, mattress

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<sup>1</sup> Trumka, Richard @TrumkaCPSC. "See you in court, Mr. President." *Twitter*, 9 May 2025, <https://x.com/TrumkaCPSC/status/1920829190208655645>.; Hoehn-Saric, Alexander @HoehnSaricCPSC. "President Trump is attempting to illegally remove me from the CPSC. See my statement." *Twitter*, 9 May 2025, <https://x.com/hoehnsariccpsc/status/1920838496039666092?s=46&t=fFGtPEY2EjySsBua6HhwPg>.

<sup>2</sup> Hoehn-Saric, Alexander @HoehnSaricCPSC. "President Trump is attempting to illegally remove me from the CPSC. See my statement." *Twitter*, 9 May 2025, <https://x.com/hoehnsariccpsc/status/1920838496039666092?s=46&t=fFGtPEY2EjySsBua6HhwPg>.

<sup>3</sup> 15 U.S. Code § 2053(a).

<sup>4</sup> *Id.*

flammability, and infant sleep products.<sup>5</sup> In Fiscal Year 2024, the Commission actively facilitated the establishment of 26 voluntary safety standards and negotiated and implemented 333 recalls involving 41 million products.<sup>6</sup> Further, the CPSC screened millions of e-commerce listings, facilitated the removal of over 53,000 recalled or banned products, and conducted approximately 1,000 inspections, surveillance efforts, and recall effectiveness checks to ensure compliance with product safety laws.<sup>7</sup>

The attempted firings are not for cause. The emails received by Commissioners Trumka and Boyle merely state that “[o]n the behalf of President Donald J. Trump, I am writing to inform you that your position on the Consumer Product Safety Commission is terminated effective immediately.” No neglect of duty was cited. No malfeasance was alleged.

Ninety years ago, the Supreme Court affirmed that the Constitution does not grant the President the power to ignore congressionally established guardrails and fire expert commissioners of independent agencies. In *Humphrey's Executor v. United States*, the Court ruled that it is “plain under the Constitution that illimitable power of removal is not possessed by the President in respect of officers” of independent agencies.<sup>8</sup> Congress does indeed have the power to establish fixed terms by which CPSC Commissioners will serve and “forbid their removal except for cause.”<sup>9</sup>

This unlawful effort to dismantle the leadership and bipartisanship of the CPSC will significantly undermine the Agency’s ability to protect the health and safety of the American people through the creation of strong safety standards, recalls of hazardous products, and educational campaigns. Diverse perspectives improve safety. Silencing the voices of subject matter experts with whom you politically disagree would have a chilling effect on the CPSC’s functions. The Agency’s safety standards, enforcement actions, consumer education campaigns, data collection initiatives, and recall processes could all suffer. Further, the remaining CPSC Commissioners may only be able to perform the “transaction of business” for six months.<sup>10</sup> Under current law, if only two members are serving on the CPSC because of vacancies, those two Commissioners constitute a quorum for six months.<sup>11</sup>

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<sup>5</sup> National Archives. “Federal Register” [www.federalregister.gov/documents/search?conditions%5Bagencies%5D%5B%5D=consumer-product-safety-commission&conditions%5Bpublication\\_date%5D%5Bgte%5D=01%2F1%2F2021&conditions%5Bpublication\\_date%5D%5Blte%5D=01%2F20%2F2025&conditions%5Btype%5D%5B%5D=RULE&order=relevant](https://www.federalregister.gov/documents/search?conditions%5Bagencies%5D%5B%5D=consumer-product-safety-commission&conditions%5Bpublication_date%5D%5Bgte%5D=01%2F1%2F2021&conditions%5Bpublication_date%5D%5Blte%5D=01%2F20%2F2025&conditions%5Btype%5D%5B%5D=RULE&order=relevant). Accessed 14 March 2025.

<sup>6</sup> Consumer Product Safety Commission. “Annual Performance Report.” 17 January 2025, [www.cpsc.gov/s3fs-public/FY-2024-APR-508-compliant.pdf?VersionId=7tC4.3apuIg7z.nc2fS7fzEJHSsYOPcz](https://www.cpsc.gov/s3fs-public/FY-2024-APR-508-compliant.pdf?VersionId=7tC4.3apuIg7z.nc2fS7fzEJHSsYOPcz). Consumer Product Safety Commission. “Operating Plan.” 25 February 2025, [www.cpsc.gov/s3fs-public/FY-2025-Op-Plan-revised-02-25-25.pdf?VersionId=eoC76aLTUB8Bq.If8WV6gezjkm9klj.1](https://www.cpsc.gov/s3fs-public/FY-2025-Op-Plan-revised-02-25-25.pdf?VersionId=eoC76aLTUB8Bq.If8WV6gezjkm9klj.1).

<sup>7</sup> *Id.*

<sup>8</sup> U.S. Reports: *Humphrey's Executor v. U.S.*, 295 U.S. 602 (1935).

<sup>9</sup> *Id.*

<sup>10</sup> 15 U.S.C. § 2053(d).

<sup>11</sup> *Id.*

We urge you to reverse course and ensure that Commissioners Hoehn-Saric, Trumka, and Boyle are reinstated to serve the remainder of their statutorily granted terms. Your administration's prioritization of consumer and product safety can protect American families against preventable deaths and injuries.

Respectfully,

National Consumers League	Bike LA
Consumer Federation of America	Bike Pittsburgh
Consumer Reports	BioInjury, LLC
Access Ready Inc.	California Bicycle Coalition
Aden Lamps Foundation	Center for Auto Safety
Aging Life Care Association	Center for Digital Democracy
America Walks	Center for Economic Integrity
American Academy of Pediatrics, Arizona Chapter	Center for Economic Justice
American Academy of Pediatrics, Florida Chapter	Center for Justice & Democracy
American Academy of Pediatrics, Georgia Chapter	Center for Pet Safety
American Academy of Pediatrics, Idaho Chapter	Child Care Aware of Virginia
American Academy of Pediatrics, Virginia Chapter	Claire Bear Foundation
American Academy of Pediatrics, Washington D.C. Chapter	Consumer Action
American Academy of Pediatrics, West Virginia Chapter	Consumers for Auto Reliability and Safety
Bicycle Alliance of Minnesota	Cribs for Kids
Bicycle Coalition of Greater Philadelphia	Derrick Stone Safe Sleep
Bicycle Colorado	Disability Rights Education and Defense Fund
Bicycle Helmet Safety Institute	Earth Ethics, Inc.
Bike Cleveland	Families for Safe Streets
	First Candle
	Food Empowerment Project
	Government Information Watch
	Green America

Hawai'i Bicycling League  
Healthy Babies Bright Futures  
Homestretch Nonprofit Housing Corp.  
Housing and Economic Rights Advocates  
Just Strategy  
Keeping Babies Safe  
Kids and Car Safety  
League of American Bicyclists  
Living Streets Alliance  
Local Motion  
Main Street Academies  
Maine People's Alliance  
Massachusetts Bicycle Coalition  
Missourians for Responsible Transportation  
Napa County Bicycle Coalition  
National Bicycle Dealers Association  
National Coalition for Safer Roads  
National Drowning Prevention Alliance  
Oregon Consumer Justice  
Oregon Consumer League  
PediMom LLC  
People Power United  
Responsible Sourcing Network  
Ride Illinois  
Safe Infant Sleep  
Safety Research & Strategies  
Sciencecorps

Shepard's Watch  
Stop Drowning Now  
StopDistractions.org  
The National Carbon Monoxide Awareness Association  
The Center for Science in the Public Interest (CSPI)  
The Wisconsin Bike Federation  
Together We Thrive, Inc.  
Trailnet  
Truck Safety Coalition  
United States Swim School Association  
Unleaded Kids  
US Swim School Association  
Virginia Citizens Consumer Council  
Washington Area Bicyclist Association  
West Virginia Citizen Action Group  
Women in Fire  
Justin Raphael, Product Safety Advocate  
Kelli Schweigart, Product Safety Advocate  
Kristina Knapp, Product Safety Advocate  
Mary Jagim, Product Safety Advocate  
Mayra Romero-Ferman, Product Safety Advocate  
Melissa Wandall, Product Safety Advocate  
Michael Haggard, Product Safety Advocate  
Nina Batista, Product Safety Advocate

Pamela Gilbert, Product Safety  
Advocate

Paul Susca, Product Safety Advocate

Sandeep Khatua, Product Safety  
Advocate

Sara Thompson, Parent Advocate

Sofia Diaz, Product Safety Advocate

Stephen Hargarten MD MPH, Product  
Safety Advocate

Taylor Bethard, Parent Advocate

May 28, 2026

The Honorable Susan Collins  
Chair  
Committee on Appropriations  
United States Senate  
Washington, D.C. 20510

The Honorable Tom Cole  
Chair  
Committee on Appropriations  
United States House of Representatives  
Washington, D.C. 20515

The Honorable Ted Cruz  
Chair  
Committee on Commerce, Science, and  
Transportation  
United States Senate  
Washington, D.C. 20510

The Honorable Brett Guthrie  
Chair  
Committee on Energy and Commerce  
United States House of Representatives  
Washington, D.C. 20515

The Honorable Patty Murray  
Ranking Member  
Committee on Appropriations  
United States Senate  
Washington, D.C. 20510

The Honorable Rosa DeLauro  
Ranking Member  
Committee on Appropriations  
United States House of Representatives  
Washington, D.C. 20515

The Honorable Maria Cantwell  
Ranking Member  
Committee on Commerce, Science, and  
Transportation  
United States Senate  
Washington, D.C. 20510

The Honorable Frank Pallone Jr.  
Ranking Member  
Committee on Energy and Commerce  
United States House of Representatives  
Washington, D.C. 20515

Dear Chairs Collins, Cruz, Cole, and Guthrie, and Ranking Members Murray, Cantwell, DeLauro, and Pallone,

We write to urge you to preserve an independent, bipartisan Consumer Product Safety Commission (CPSC) and ensure the agency has the appropriate tools, resources, and personnel to carry out its lifesaving mission.

The CPSC is an independent federal agency commissioned by Congress in 1972 to protect the public from unreasonable risks of injury or death from consumer products through education, safety standards, regulation, and enforcement.<sup>1</sup> 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

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<sup>1</sup> Consumer Product Safety Commission. "About Us." [www.cpsc.gov/About-CPSC](http://www.cpsc.gov/About-CPSC). Accessed 29 April 2026.

reduction in fire injuries from 1980 to 2018.<sup>2</sup> Child poisonings have decreased by 80 percent between 1972 and 2020.<sup>3</sup> Bicycle injuries dropped by 35 percent between 1973 and 2020.<sup>4</sup> Deaths from refrigerator door entrapments and garage door incidents have been virtually eliminated.<sup>5</sup> Crib deaths have plummeted by 80 percent from 1973 to 2018.<sup>6</sup> Pool and pool equipment injury rates have decreased by 55 percent from 1975 to 2019.<sup>7</sup>

We strongly oppose any attempt to dramatically restructure the CPSC, reduce the agency’s workforce, and decrease funding for consumer product safety. The FY 2027 Department of Health and Human Services’ (HHS) budget and FY 2027 CPSC budget recommend that CPSC’s functions be transferred to HHS.<sup>8</sup> The CPSC budget also requests \$135 million in funding (a 10 percent funding cut compared to FY 2025 levels) and 459 employees (a 14 percent reduction of staff compared to FY 2025 levels).<sup>9</sup>

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” to a new agency by executive action.<sup>10</sup> If this proposal were unilaterally carried out, product 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 or 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 statutory authority to establish product safety standards, pursue enforcement actions, implement consumer education campaigns, conduct data collection, and oversee recalls and safety warnings 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.<sup>11</sup> Any effort to use HHS’s existing authorities to replicate CPSC activities would be vulnerable to legal challenge, potentially leaving a regulatory black hole through which dangerous consumer products could freely enter the stream of commerce. Replicating the

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<sup>2</sup> 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](http://www.cpsc.gov/Newsroom/News-Releases/2022/CPSC-Celebrates-50-Years-of-Making-Consumer-Safety-our-Mission).

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> Department of Health & Human Services. “Fiscal Year 2027 Budget in Brief.” <https://www.hhs.gov/about/budget/budget-in-brief/index.html>. Accessed 29 April 2026; Consumer Product Safety Commission. “Performance Budget Request to OMB & Congress Fiscal Year 2027.” April 2026. [https://www.cpsc.gov/s3fs-public/FY27\\_Budget.pdf](https://www.cpsc.gov/s3fs-public/FY27_Budget.pdf).

<sup>9</sup> *Id.*

<sup>10</sup> 15 U.S.C. Chapter 47; 16 CFR Chapter II.

<sup>11</sup> 15 U.S.C. Chapter 47.

CPSC’s activities would likely require several cumbersome rulemakings, which could take years to complete, if ever finalized.

Furthermore, HHS is not well-suited to oversee household product safety. HHS 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.<sup>12</sup> Product safety will likely be deprioritized. Competition with other 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.

The additional layers of bureaucracy will lead to less effective and efficient governance of household product safety. Rulemakings, enforcement actions, research initiatives, and education campaigns may be subject to review, modification, and approval by the Secretary of HHS. Such processes could add months, if not years, to product safety actions, if the action is permitted at all. With approximately 49,000 product-related deaths, 34 million product-related injuries, and consumer product incidents accounting for \$1 trillion in societal costs each year, the American public can ill afford foreseeable delays and denials.<sup>13</sup>

Congress deliberately established an independent, bipartisan agency with exclusive authority over the safety of consumer products. Such independence ensures that product safety issues are treated like the public safety imperative they so clearly are. 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 profit while fulfilling their obligation to protect their customers.

We thank you for your prompt attention to this important matter.

Respectfully,

National Consumers League  
Consumer Reports  
Access Ready Inc.  
Action on Smoking and Health  
Activate St. Pete  
Adventure Cycling Association

Advocates for Highway and Auto Safety  
Consumer Federation of America  
Aging Life Care Association  
American Academy of Pediatrics  
American Academy of Pediatrics California  
Chapter 1

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<sup>12</sup> Congressional Research Service. “Department of Health and Human Services: FY 2025 Budget Request.” 23 May 2024. [www.congress.gov/crs-product/R48060](https://www.congress.gov/crs-product/R48060).

<sup>13</sup> 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=bPIYVZJhOwvBRyFm2vIm0036tN7P0AKm>; Consumer Product Safety Commission. “Strategic Plan 2018-2022.” [https://www.cpsc.gov/s3fs-public/CPSC\\_2018-2022\\_Strategic\\_Plan.pdf](https://www.cpsc.gov/s3fs-public/CPSC_2018-2022_Strategic_Plan.pdf). Accessed 29 April 2026.

American Academy of Pediatrics, DC  
Chapter  
American Academy of Pediatrics, New York  
Chapter 2  
American Academy of Pediatrics, New York  
Chapter 3  
American Pediatric Surgical Association  
Arizona Chapter of the American Academy  
of Pediatrics  
Bicycle Alliance of Minnesota (BikeMN)  
Bicycle Helmet Safety Institute  
Bike East Bay  
Bike JC  
Bike Los Altos  
Bike Oven  
Bike Pittsburgh  
Bike Walk Knoxville  
Bike Walk Tennessee  
BikeDFW  
BikeLA  
Bike-Walk Alliance of New Hampshire  
Breast Cancer Prevention Partners  
Brookhaven Bike Alliance  
Brynne Clippard  
California Bicycle Coalition  
Center for Auto Safety  
Center for Digital Democracy  
Center for Justice & Democracy  
Center for Pet Safety  
Center for Science in the Public Interest  
Central New Hampshire Bicycle Coalition  
Champaign County Bikes  
Citizens Action Coalition of IN  
Claire Bear Foundation  
activ  
Connect Pinellas, Inc.  
Consumer Action  
Consumer Federation of California  
Consumers for Auto Reliability and Safety  
Cribs for Kids  
American Academy of Pediatrics, Delaware  
Chapter  
Detroit Greenways Coalition  
Earth Ethics, Inc.  
East Coast Greenway Alliance

EZ Ride  
Families for Safe Streets  
First Candle  
American Academy of Pediatrics, Florida  
Chapter  
Friends of the Concord-Lake Sunapee Rail  
Trail  
Friends of the Salem Rail Trail  
Georgia Advancing Communities Together,  
Inc.  
Government Information Watch  
GreenLatinos  
Healthy Babies Bright Futures  
Homestretch Nonprofit Housing Corp  
Housing and Economic Rights Advocates  
American Academy of Pediatrics, Idaho  
Chapter  
American Academy of Pediatrics, Illinois  
Chapter  
Indoor Environments Association  
Isles, Inc.  
Just Strategy  
Kansas Chapter, American Academy of  
Pediatrics  
Keeping Babies Safe  
American Academy of Pediatrics, Kentucky  
Chapter  
Kids and Car Safety  
League of American Bicyclists  
League of Michigan Bicyclists  
Live Well Grand Cities  
Living Streets Alliance  
Local Motion, Inc.  
American Academy of Pediatrics, Maine  
Chapter  
Marin County Bicycle Coalition  
MarketEdge Consulting  
Missouri Bicycle & Pedestrian Federation  
Missourians for Responsible Transportation  
Muscular Dystrophy Association  
Napa County Bicycle Coalition  
National Bicycle Dealers Association  
National Center for Health Research  
National Center for Healthy Housing  
National Coalition for Safer Roads

National Drowning Prevention Alliance  
NC Pediatric Society  
New Haven Coalition for Active  
Transportation - NCAT  
NH Rail Trails Coalition  
American Academy of Pediatrics, Ohio  
Chapter  
Oregon Consumer Justice  
Oregon Consumer League  
Parents Against Vaping  
Parents for Window Blind Safety  
People Power United  
Plano Bicycle Association  
Product Injury Coalition  
Reconnect Rochester  
Reese's Purpose  
Responsible Sourcing Network  
Rhode Island Bicycle Coalition  
Ride Illinois  
Safe Kids Worldwide  
Safe Routes Partnership  
Safety Research & Strategies  
San Diego County Bicycle Coalition  
Santa Monica Safe Streets Alliance  
Santa Monica Spoke  
South Carolina Appleseed Legal Justice  
Center  
StopDistractions.org  
Tempe Bicycle Action Group

The Bicycle Coalition of Maine  
The Wisconsin Bike Federation  
Trailnet  
Treasure Valley Safe Routes to School  
Truck Safety Coalition  
U.S. Public Interest Research Group  
Unleaded Kids  
US Swim School Association  
Velo Cruces, Inc.  
American Academy of Pediatrics, Virginia  
Chapter  
Virginia Citizens Consumer Council  
Vision Zero Maine  
Walk 'n Rollers  
Washington Area Bicyclist Association  
West Virginia Citizen Action Group  
Yakima Bikes and Walks!  
ZeroW.org  
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Joleen Evans, Product Safety Advocate  
Mayra Romero-Ferman, Juvenile Product  
Safety Advocate  
Michael Haggard, Product Safety Advocate  
Nancy Cowles, Children's Product Safety  
Advocate  
Tomorrow Bowen, Product Safety Advocate