

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.”

4Id.

5Id.

6Id.

7Id.

8Id.

9Id 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

14 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.

15 Consumer product incidents account for \$1 trillion in costs to society each year.

16 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

Association of Pedestrian & Bicycle

Professionals (APBP)

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

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/s3fspublic/ConsumerProductRelatedInjuriesandDeathsInTheUnitedStates.pdf?VersionId=bPIYVZJhOwvBRyFm2vIm0O36tN7P0AKm>.

15 Consumer Product Safety Commission. "Strategic Plan 2018-2022."

https://www.cpsc.gov/s3fspublic/CPSC_2018-2022_Strategic_Plan.pdf. Accessed 15 March 2025.

California Bicycle Coalition

Center for Auto Safety

Center for Economic Integrity

Center for Economic Justice

Center for Medicare Advocacy

Center for Pet Safety

Charlie's House

Child Care Aware of Virginia

ChildSavers

Citizens Action Coalition of IN

Claire Bear Foundation

CommunicationFIRST
Consumer Action
Consumers for Auto Reliability and Safety
Cribs for Kids
Derrick Stone Safe Sleep
Detroit Greenways Coalition
Disability Rights Education and Defense
Fund (DREDF)
Diversity In Aquatics
Earth Ethics, Inc.
East Coast Greenway Alliance
Economic Action Maryland Fund
Epilepsy Foundation of America
Families for Safe Streets
First Candle
Florida Bicycle Association
Florida Silver Haired Legislature Inc
Food Empowerment Project
Friends of the Concord-Lake Sunapee Rail Trail
Funeral Consumers Alliance of South Carolina
Georgia Watch
Government Information Watch
Green America
Hackensack Meridian Health
Haddie's Calling
Hawai'i Bicycling League

Healthy Babies Bright Futures
HealthyWomen
Homestretch Nonprofit Housing Corp.
Human Powered Solutions LLC
Impact Teen Drivers
Jacob Bikes
Joseph A Sanzari Children's Hospital
Just Strategy
Keeping Babies Safe
Kids and Car Safety
La Isla Network
Lead on Solutions, LLC
League of American Bicyclists
Living Streets Alliance
Local Motion
Madison Bikes, Inc.
Marin County Bicycle Coalition
MassBike
Missourians for Responsible Transportation
Move Redmond
Muscular Dystrophy Association
Napa County Bicycle Coalition
National Association of Consumer Advocates
National Bicycle Dealers Association
National Carbon Monoxide Awareness Association
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
Responsible Sourcing Network
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

Cc:

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

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