



July 19, 2012

Joshua M. Sharfstein, M.D.
Secretary
Department of Health and Mental Hygiene
201 W. Preston St.
Room 512
Baltimore, MD 21201

Dear Dr. Sharfstein:

As members of the Patient, Consumer, and Public Health Coalition, we are writing to express our strong support for Maryland's proposed regulation to ban baby bumper pads in cribs. We agree with the Department of Health and Mental Hygiene (DHMH) that "the pads pose a risk of suffocation, strangulations, and death."¹

The American Academy of Pediatrics (AAP) has stated that bumper pads should not be used in cribs because they can kill infants and there is no evidence that they prevent injuries.² The AAP stated that crib bumper pads were originally developed to prevent an infant's head from becoming entrapped between crib slats. However, for many years cribs have been required to place their slats closer together, so that design problem has been solved without the use of risky crib bumpers.³

The U.S. Consumer Product Safety Commission reviewed its databases from January 1, 1990 to May 6, 2010 and found "a total of 52 infant deaths where bumper pads were mentioned in the narrative." In ten of the reports, there were no other contributing factors to the deaths other than the infant sleeping face-down next to the bumpers. The reports included statements such as "face obstructed by bumper pad" and "suffocated in corner against bumper pad."⁴ Health

Canada, the agency responsible for helping Canadians maintain and improve their health, recommends that bumper pads not be used in cribs because they pose an entanglement, entrapment, strangulation, and suffocation hazard to infants. Between 1987 and 2001, Health Canada received reports of 23 incidents involving bumper pads, including one strangulation death, one suffocation death, and three near-suffocation occurrences.⁵ In September 2011, the Chicago City Council approved an ordinance to ban bumper pads “due to concern that the popular products pose a suffocation risk to babies.”⁶

In the ideal world, parents would understand the risks of crib bumpers and would decide not to use them. However, in the real world, not all parents understand these risks and it is not uncommon for crib bumpers to be given as baby gifts or shared by friends and siblings as hand-me-downs with baby clothes and toys. That is why a law is necessary to save lives. Maryland’s proposed ban is a key component of the state’s overall effort to promote safe sleep for infants, which includes the ABCs of sleep— babies should sleep Alone on their Backs in a Crib. The proposed ban would take effect on June 21, 2013 giving retailers plenty of time to comply with the regulation.

For the above reasons, we strongly support the proposed ban. The risks of bumper pads in cribs are real (suffocation, strangulations, and entrapment) while the benefits are essentially nonexistent. The four doctors on Maryland’s expert advisory panel regarding crib baby bumpers concluded that there was no evidence for meaningful benefits of bumper pads to infants.⁷ This ban will help to protect more than 70,000 babies born in Maryland each year.

American Medical Women’s Association
Consumer Federation of America
Consumers Union
Jacob’s Institute of Women’s Health
National Consumers League
National Research Center for Women & Families
National Women’s Health Network
Public Citizen
Safe Kids Worldwide
U.S. PIRG
WoodyMatters

For more information, contact Paul Brown at (202) 223-4000 or pb@center4research.org

¹ Maryland Department of Health and Mental Hygiene (2012). *Q & A – Proposed Regulations Banning Baby Bumper Pads*.

² **American Academy of Pediatricians’ Web site accessed June 11, 2012.**

<http://www.healthychildren.org/English/ages-stages/baby/sleep/Pages/Suitable-Sleeping->

[Sites.aspx?nfstatus=401&nftoken=00000000-0000-0000-0000-000000000000&nfstatusdescription=ERROR%3a+No+local+token](#)

³ ***Pediatrics*, SIDS and Other Sleep-Related Infant Deaths: Expansion of Recommendations for a Safe Infant Sleeping Environment; *Pediatrics* 2011; 128; e1341; originally published online October 17, 2011.**

⁴ Consumer Product Safety Commission (2010). White Paper – Unsafe Sleep Settings Hazards Associated with the Infant Sleep Environment and Unsafe Practices Used by Caregivers: A CPSC Staff Perspective.

⁵ **Health Canada. Policy Statement for Bumper Pads (August 2005).** <http://www.hc-sc.gc.ca/cps-sp/legislation/pol/bumper-bordure-eng.php>

⁶ Gabler E. (September 9, 2011). Council bans sale of crib bumper pads in Chicago; *Chicago Tribune*. http://articles.chicagotribune.com/2011-09-09/news/ct-met-crib-bumper-council-20110909_1_bumper-pads-sale-of-crib-bumper-crib-and-tie

⁷ Maryland Department of Health and Mental Hygiene (2012). Background and Assessment for Proposal to Prohibit Safe of Baby Bumper Pads.