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Standard Consumer Safety Specification for Expansion Gates and Expandable Enclosures¹

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INTRODUCTION

This consumer safety specification addresses incidents of head and neck entrapment in children's expansion gates and expandable enclosures. It also addresses the ability of a pressure gate to resist a push-out force.

The U.S. Consumer Product Safety Commission (CPSC) identified incidents that generally involved a child's head or neck, or both, becoming entrapped in diamond-shaped openings and strangulation of children in V-shapes at the top of accordion style expansion gates or expandable enclosures. Additional incidents and injuries were identified that involved children attempting to climb up and over expansion gates and expandable enclosures, and pushing or pulling pressure gates out of doorways.

This consumer safety specification is written within the current state-of-the-art of gate and enclosure technology. It is intended that this consumer safety specification will be updated whenever substantive information becomes available, which necessitates additional requirements or justifies the revision of existing requirements.

This specification does not address incidents in which gates or enclosures are blatantly misused although warnings and safety instructions are required to be displayed prominently on and with each gate or enclosure.

1. Scope*

1.1 This consumer safety specification covers minimum safety performance requirements, test methods, and requirements for labeling and instructional material to minimize hazards to young children resulting from the normal use and reasonably foreseeable misuse and abuse of expansion gates and expandable enclosures.

1.2 Products known as expansion gates and expandable enclosures, or by any other name, which are in the scope of this consumer safety specification are intended for young children aged six months through 24 months, and are defined in Section 3.

1.3 Expansion gates and expandable enclosures defined in Section 3 are for domestic use and are not to be confused with other types of gates or enclosures that may be specifically designed for commercial, institutional, agricultural, pet use, or any other such use.

1.4 No expansion gate or expandable enclosure as defined in Section 3, that is, produced after the approval date of this consumer safety specification either by label or other means, shall indicate compliance with this specification unless it conforms to all the requirements contained herein.

1.5 For expediency, expansion gates and expandable enclosures as defined in Section 3 will heretofore be referred to in this consumer safety specification as “gates” and “enclosures” unless referred to definitively.

1.6 The values stated in inch-pound units are to be regarded as standard. The values given in parentheses are mathematical conversions to SI units that are provided for information only and are not considered standard.

1.7 The following pertains only to the test methods portion, Section 7, of this specification. *This standard does not purport to address all of the safety concerns, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate safety, health, and environmental practices and determine the applicability of regulatory limitations prior to use.*

1.8 *This international standard was developed in accordance with internationally recognized principles on standardization established in the Decision on Principles for the*

¹ This consumer safety specification is under the jurisdiction of ASTM Committee F15 on Consumer Products and is the direct responsibility of Subcommittee F15.11 on Bed Rails.

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*A Summary of Changes section appears at the end of this standard

Development of International Standards, Guides and Recommendations issued by the World Trade Organization Technical Barriers to Trade (TBT) Committee.

2. Referenced Documents

2.1 ASTM Standards:²

- D3359** Test Methods for Rating Adhesion by Tape Test
- F406** Consumer Safety Specification for Non-Full-Size Baby Cribs/Play Yards
- F963** Consumer Safety Specification for Toy Safety

2.2 British Standard:³

- BS 4125** Specification for Safety Requirements for Child Safety Barriers for Domestic Use

2.3 Federal Regulations:⁴

- 16 CFR 1303** Ban of Lead-Containing Paint and Certain Consumer Products Bearing Lead Containing Paint
- 16 CFR 1500** Hazardous Substances Act Regulations, Including Parts:
- 16 CFR 1500.48** Technical Requirements for Determining a Sharp Point in Toys and Other Articles Intended for Use by Children Under Eight Years of Age
- 16 CFR 1500.49** Technical Requirements for Determining a Sharp Metal or Glass Edge in Toys and Other Articles Intended for Use by Children Under Eight-Years of Age
- 16 CFR 1501** Method for Identifying Toys and Other Articles Intended for Use by Children Under Three Years of Age Which Present Choking, Aspiration, or Ingestion Hazards Because of Small Parts

2.4 ANSI Standards:⁵

- ANSI Z535.1** American National Standard for Safety Colors
- ANSI Z535.4** American National Standard for Product Safety Signs and Labels
- ANSI Z535.6** American National Standard: Product Safety Information in Product Manuals, Instructions, and Other Collateral Materials

3. Terminology

3.1 Definitions of Terms Specific to This Standard:

3.1.1 *automatic closing system, n*—a feature (or mechanism) the manufacturer claims, markets, or intends to close an egress panel automatically without the intervention of the user.

3.1.2 *completely-bounded opening, n*—any opening in the main structure of a product that is enclosed totally by boundaries on all sides.

3.1.3 *conspicuous, adj*—visible, when the gate/expandable enclosure is in all manufacturer's recommended use positions, to a person standing near the gate/expandable enclosure at any

one position around the gate/expandable enclosure, but not necessarily visible from all positions.

3.1.4 *double-action release mechanism, n*—a release mechanism requiring either two consecutive actions, the first of which must be maintained while the second is carried out, or two separate and independent single-action release mechanisms that must be activated simultaneously to unlock the gate/enclosure.

3.1.5 *egress panel, n*—panel(s) within a gate or enclosure designed to swing, retract, or fold open to allow passage.

3.1.5.1 *Discussion*—Pressure-mounted gates that require the pressure to be released in order to allow passage are not considered to contain an egress panel.

3.1.6 *expandable enclosures, n*—self-supporting barrier intended to completely surround an area or play-space within which a young child (see 1.2) may be confined.

3.1.6.1 *Discussion*—Enclosures may be marketed for indoor or outdoor use, or both. Expandable enclosures do not include an attached floor.

3.1.7 *expansion gate, n*—barrier intended to be erected in an opening, such as a doorway, to prevent the passage of young children (see 1.2), but which can be removed by older persons who are able to operate the locking mechanism.

3.1.7.1 *Discussion*—Such gates are available in a number of different styles of construction and are manufactured from a variety of different materials.

3.1.8 *extension panel(s), n*—any panel recommended by the manufacturer for extending the length or height of the product including panels sold with the gate/enclosure and those sold separately.

3.1.9 *hold-open mechanism, n*—a feature sometimes included with automatic closing gates where the gate will stay in a fully open position and not automatically close the egress panel.

3.1.10 *manufacturer's recommended use position(s)*—any position that is presented by the manufacturer in any descriptive or instructional literature as a normal, allowable, or acceptable configuration for the use of the product.

3.1.10.1 *Discussion*—This specifically excludes positions which the manufacturer shows in its literature to be unacceptable, unsafe, or not recommended.

3.1.11 *nonpaper label, n*—any label material, such as plastic or metal, which either will not tear without the aid of tools or tears leaving a sharply-defined edge.

3.1.12 *paper label, n*—any label material, which tears without the aid of tools and leaves a fibrous edge.

3.1.13 *partially-bounded opening, n*—any opening in the main structure of a product that is not enclosed totally by boundaries on all sides.

3.1.13.1 *Discussion*—For example, a V-shape in the top of an accordion slat-style product or a rectangular notch resulting from a gap between a wall surface and the main structure of a baby gate would be considered a partially-bounded opening.

3.1.14 *pressure-mounted gate, n*—any gate which relies on pressure as the mechanism by which the gate stays in its manufacturer's recommended use position.

² For referenced ASTM standards, visit the ASTM website, www.astm.org, or contact ASTM Customer Service at service@astm.org. For *Annual Book of ASTM Standards* volume information, refer to the standard's Document Summary page on the ASTM website.

³ Available from British Standards Institute (BSI), 389 Chiswick High Rd., London W4 4AL, U.K., <http://www.bsi-global.com>.

⁴ *Code of Federal Regulations* is available from the Superintendent of Documents, Government Printing Office, Washington, DC 21402.

⁵ Available from American National Standards Institute (ANSI), 25 W. 43rd St., 4th Floor, New York, NY 10036, <http://www.ansi.org>.

3.1.15 *side pressure, n*—force required, at each contact location of the gate and mounting surface, to meet the requirements of 6.3 as determined by the manufacturer.

3.1.16 *static load, n*—vertically downward force applied by a calibrated force gauge or by dead weights.

3.1.17 *visual side-pressure indicator, n*—a warning system, device, or provision using contrasting colors, lights, or other similar means designed to visually alert the installer/user to the status of the side pressure of a pressure-mounted gate during installation and use.

4. Calibration and Standardization

4.1 All testing shall be conducted on a concrete floor which may be covered with 1/8-in. (3-mm) thick vinyl floor cover, unless the test instructs differently.

4.2 The gate/expandable enclosure shall be completely assembled, unless otherwise noted, in accordance with the manufacturer's instructions.

4.3 No testing shall be conducted within 48 h of manufacturing.

4.4 The product to be tested shall be preconditioned in a room with an ambient temperature of $73^{\circ}\text{F} \pm 9^{\circ}\text{F}$ ($23^{\circ}\text{C} \pm 5^{\circ}\text{C}$) for at least 1 h prior to testing. Testing then shall be conducted within this temperature range.

4.5 All testing required by this specification shall be conducted on the same unit. The gate/expandable enclosure with and without any and all extension panels installed in any of the manufacturer's recommended use positions must comply with the standard.

5. General Requirements

5.1 *Wood Parts*—Prior to testing, any exposed wood parts shall be smooth and free from splinters. Slats are not permitted to contain any lateral/transverse joints, such as finger-joints, or any other means of joining pieces of lumber end-to-end.

5.2 Screws shall not be used in the assembly of any components or locking or attaching device (or devices) that are intended to be removed by the consumer during daily operations.

5.3 There shall be no hazardous sharp edges or points as defined by 16 CFR 1500.48 and 16 CFR 1500.49 before or after testing to this consumer safety specification.

5.4 There shall be no small parts as defined by 16 CFR 1501 before testing or liberated as a result of testing to this specification.

5.5 *Openings*—Holes or slots that extend entirely through a wall section of any rigid material less than 0.375 in. (9.53 mm) thick and admit a 0.210-in. (5.33-mm) diameter rod shall also admit a 0.375-in. (9.53-mm) diameter rod. Holes or slots that are between 0.210 in. (5.33 mm) and 0.375 in. (9.53 mm) and have a wall thickness less than 0.375 in. (9.53 mm) but are limited in depth to 0.375 in. (9.53 mm) maximum by another rigid surface shall be permissible (see Fig. 1). The product shall be evaluated in all manufacturer's recommended positions.

5.5.1 Openings through multiple wall sections and openings created by multiple wall sections must meet the size requirements in 5.5 if the total thickness of the combined wall sections and any air gap between the wall sections is less than 0.375 in. (9.53 mm).

5.6 *Exposed Coil Springs*—Any exposed coil spring, which is accessible to the occupant having or capable of generating a space between coils of 0.210 in. (5.33 mm) or greater during static load testing in accordance with 7.8 shall be covered or otherwise designed to prevent injury from entrapment.

5.7 *Scissoring, Shearing, and Pinching*—The gate/expandable enclosure when in the manufacturer's recommended use position(s) shall be designed and constructed to prevent injury to the child from any scissoring, shearing, or pinching when members or components rotate about a common axis or fastening point, slide, pivot, fold, or otherwise move relative to one another. Scissoring, shearing, or pinching that may cause injury shall not be permissible when the edges of any rigid parts admit a probe greater than 0.210 in. (5.33 mm) and less than 0.375 in. (9.53 mm) diameter at any accessible point through the range of motion of such parts.

5.8 Labeling:

5.8.1 Warning labels (whether paper or nonpaper) shall be permanent when tested in accordance with 7.12.1 – 7.12.3.

5.8.2 Warning statements applied directly onto the surface of the product by hot stamping, heat transfer, printing, wood burning, etc., shall be permanent when tested in accordance with 7.12.4.

5.8.3 Nonpaper labels shall not liberate small parts when tested in accordance with 7.12.5.

5.9 The paint and surface coating on the product shall comply with 16 CFR 1303.

5.10 *Protective Components*—If a child can grasp protective components, such as caps, sleeves, or plugs used for protection from sharp edges, points, or entrapment of fingers or toes, between the thumb and forefinger, or teeth, or if there is at least a 0.040 in. (1.00 mm) gap between the component and its adjacent parent component, such components shall not be removed when tested in accordance with 7.7.

6. Performance Requirements

6.1 The following performance requirements apply to gates and enclosures when they are erected or installed in any of the manufacturer's recommended use positions.

6.1.1 *Completely-bounded Openings*—Openings within the gate or enclosure, and completely-bounded openings between the gate and the test fixture, shall not permit the complete passage of the small torso probe (see Fig. 2) when tested in accordance with 7.10.

6.1.2 *Height of Sides*—The vertical distance from the floor to the lowest point of the uppermost surface shall not be less than 22 in. (560 mm) when measured from the floor.

6.1.3 *Vertical Strength*—Uppermost top rails, edges, or framing components of the gates or enclosures shall be tested in accordance with 7.8 and shall not fracture, disengage, fold, or have a deflection that reduces the lowest point of the uppermost surface of a gate or enclosure to a dimension of less