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Chair Riley and honorable Senate Labor & Business Committee members:

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My name is Dr. Paul Mitchell and I'm a Pediatric Resident Physician at OHSU Doernbecher Children's Hospital. I am writing on behalf of OHSU and the Oregon Pediatric Society in favor of HB 3379A.

As any parent of a newborn will tell you there is nothing harder, or more important than sleep during the first several months of an infant's life. When I see families with newborns, parents want to know exactly what the secret formula is to getting more precious sleep, for both their infant and for themselves. Safe infant sleep is a big deal. In the U.S., on average, 10 babies die in their sleep every single day, making sleep-related death the single leading preventable cause of death in the first year of life. Of the approximately 3600 sleep-related deaths, around 25% are due to unintentional suffocation or strangulation of the infant in the bed where they are sleeping.¹

Helping families ensure their babies sleep safely is among the most important things I can do with parents early on. Safe sleep guidelines, as outlined by the American Academy of Pediatrics (AAP), include placing babies alone (i.e. not sharing a bed with a caregiver), on their back, and on a flat, firm surface with no loose fabric, soft bedding, or other potential suffocation or asphyxiation hazards. These recommendations derive from risk posed by potential choking or suffocation hazards in the crib combined with the immature cardiorespiratory systems of newborn infants. A loose blanket, baby toy, pillow, quilt, or sleep positioning product will put infants at risk of obstruction of their nose and mouth. I constantly emphasize to families the importance of not purchasing or using products that could suffocate their child. One product I tell every parent to avoid are crib bumpers. Crib bumpers have long been known as a cause of infant sleep related death. The AAP, the National Institutes of Health (NIH), and the Center for Disease Control and Prevention (CDC) have long warned against their use. A number of scientific studies published in peer-reviewed journals have illustrated this, and the U.S. Consumer Product Safety Commission (CPSC) has confirmed it. The most recent, a 2016 study published in *The Journal of Pediatrics*, found that, between 1985 and 2012, 48 infant deaths were directly attributed to crib bumper use. An additional 146 infants were found to have sustained injuries from



¹ <https://www.cdc.gov/sids/data.htm>. Accessed 4/4/21.

bumpers, including choking on the ties that secure the bumper to the bed or nearly suffocating.² These data likely vastly underrepresent the problem as researchers can rely only on infant deaths that are reported to the CPSC following an investigation into that death.

Crib bumpers offer no identifiable safety benefit, and pose a clear and present danger of suffocation, entrapment, and strangulation. Bumpers have been marketed as a way to prevent infant head or limb entrapment between crib slats. However, the most recent CPSC safety standard set in 2011 ensures that crib slat spacing must be less than 2 and 3/8 inches wide (about the width of a soda can).³ This distance is far too narrow for an infant head to become entrapped, rendering a bumper unnecessary for this concern. While many parents are concerned about arms or legs getting stuck between crib slats, temporary entrapment of an arm or leg may occasionally wake an infant, but will not result in significant injury or death. In fact, the 2016 study noted above found several instances of limb entrapment that occurred even with a bumper present in the crib, suggesting that the bumper was unable to prevent it.⁴ Finally, advocates have proposed that bumpers could help mitigate infant head injuries from the hard slats of the crib. While minor bumps from contact with crib slats are possible in a non-bumper environment, the force with which an infant would have to strike a crib slat to produce serious head injury or concussion is virtually impossible for them to produce without outside interference. Interestingly, the only serious head injuries noted in the 2016 study of CPSC data were from children who used the bumper to climb out of the crib and fell.

In all, the purported benefits of crib bumpers are rendered unnecessary by current crib safety standards and are substantially more dangerous to the infant than the things they seek to prevent.

Despite the prevalence of bumper-related deaths, a number of media articles detailing their danger to infants^{5,6,7}, and a coordinated effort from the AAP, SIDS experts, and consumer advocates since at least 2007 warning against their use, crib bumper deaths have not decreased. In fact, of the 48 deaths ascribed to crib bumpers from 1985-2012, 23 of them occurred in 2006-2012 alone, representing a nearly 3-fold increase from earlier time periods studied.⁸ The continued existence of crib bumpers is due to their wide availability in the marketplace, as well as their depiction in media. As pediatricians, we can only do so much to work with parents to help them understand the risks of these deadly products during the 7 scheduled visits during an

² Scheers NJ, Woodard DW, Thach BT. Crib Bumpers Continue to Cause Infant Deaths: A Need for a New Preventive Approach. *The Journal of Pediatrics*. 2016;169. doi:10.1016/j.jpeds.2015.10.050

³ <https://www.cpsc.gov/zHT-CN/node/20957>

⁴ Scheers NJ, Woodard DW, Thach BT. Crib Bumpers Continue to Cause Infant Deaths: A Need for a New Preventive Approach. *The Journal of Pediatrics*. 2016;169. doi:10.1016/j.jpeds.2015.10.050

⁵ <https://www.npr.org/sections/health-shots/2015/11/25/457285189/to-reduce-infant-deaths-doctors-call-for-a-ban-of-crib-bumpers>. Accessed 3/28/21

⁶ <https://www.washingtonpost.com/business/2020/01/22/regulators-again-struggle-with-response-crib-bumper-deaths/>. Accessed 3/28/21

⁷ https://www.washingtonpost.com/business/economy/dozens-of-infant-deaths-have-been-tied-to-a-popular-baby-product-but-regulators-are-too-paralyzed-to-act/2019/11/23/c6348d68-f5a1-11e9-a285-882a8e386a96_story.html. Accessed 3/28/21

⁸ Scheers NJ, Woodard DW, Thach BT. Crib Bumpers Continue to Cause Infant Deaths: A Need for a New Preventive Approach. *The Journal of Pediatrics*. 2016;169. doi:10.1016/j.jpeds.2015.10.050

infant's first year of life. Outside of the office, parents are constantly bombarded with images in magazines, TV shows, and targeted advertisements depicting babies in various non-safe sleep positions and frequently these images include decorative crib bumpers present in a crib. Believing with entirely good intentions that they are protecting their infant from accidental injury (as the products claim), parents continue to buy bumpers and place their infants at risk. Parents believe that because the products are sold online and in stores, their safety must have been evaluated and validated by some sort of government agency. While this is true of medications and the federal Food and Drug Administration, crib bumpers, like most infant products, are only subject to VOLUNTARY industry standards with no requirements to prove their safety before putting them on the market.⁹ This means Oregon infants are put at risk every time they are placed in a crib with a bumper.

Crib bumpers bans have been instituted in Maryland, New York, Ohio, and the city of Chicago. Walmart and Target no longer sell padded crib bumpers.¹⁰ Maryland's ban took effect in 2013. By 2015, Baltimore City, the area of Maryland with the most unexplained deaths in infancy in the state, had the lowest number of sleep-related deaths on record. 2015 also marked the lowest infant mortality in Baltimore on record and the lowest African American infant mortality on record.¹¹ Bans such as HB 3379 are not only a vitally important to cut down on confusing messaging to parents, they are also clearly effective at preventing infant death.

Crib bumpers are a completely unnecessary and dangerous product with no demonstrable benefit to infants. Their continued presence on the shelves of stores and on the online marketplace puts infants at risk of deaths that are entirely preventable. I urge you to take swift action to ban these deadly products and help to protect infants in Oregon. I ask you to vote yes on HB 3379 and I would be happy to answer any questions in the future.

Sincerely,

Paul G. Mitchell, MD

⁹ <https://www.consumerreports.org/child-safety/ban-on-padded-crib-bumpers-cpsc/>. Accessed 3/28/21

¹⁰ https://www.washingtonpost.com/business/economy/dozens-of-infant-deaths-have-been-tied-to-a-popular-baby-product-but-regulators-are-too-paralyzed-to-act/2019/11/23/c6348d68-f5a1-11e9-a285-882a8e386a96_story.html. Accessed 4/4/21

¹¹ <https://health.baltimorecity.gov/news/press-releases/2016-10-05-baltimore-city-experiences-record-low-infant-mortality-rate-2015>. Accessed 4/4/21