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February 7, 2026

TO: Oregon House Committee on Commerce and Consumer Protection
The Hon. Nathan Sosa, Chair.

Chair Sosa, Vice-Chairs Chichi and Osborne, and Members of the Committee:

Thank you for the opportunity to submit this testimony to you regarding a critical and urgent threat to Oregon's children: the proliferation of counterfeit car safety seats in our state and across the nation. My name is Benjamin Hoffman MD, and I am a pediatrician at OHSU Doernbecher Children's Hospital, a past president of the American Academy of Pediatrics, and a nationally certified child passenger safety technician with almost 30 years of expertise in child passenger safety and pediatric injury prevention. I submit this testimony on behalf of OHSU and the Doernbercher Children's Hospital Pediatric Injury Prevention Program.

I write in strong support of HB 4092, which would help address the growing prevalence of counterfeit car seats sold through online marketplaces, the catastrophic safety failures these products exhibit, and the urgent need for Oregon to take action to protect our most vulnerable passengers.

One gap in the bill, as introduced, concerns the maximum weight limit for child safety systems, set at 80 pounds. As shown in the [Car Seat Product List for 2025 from the American Academy of Pediatrics](#), Belt-positioning booster seats that meet appropriate U.S. Federal Motor Vehicle Safety Standards have upper weight limits between 100-120 pounds. As written, they would be excluded from HB 4092. I respectfully request your consideration of an amendment to remove any weight limits for child safety systems that would be affected by this bill.

The Problem: Counterfeit Car Seats Are Flooding Oregon Families

Across the United States, medical providers, child passenger safety technicians, and consumer protection agencies have documented a dramatic increase in counterfeit car safety seats over the past five years[1]. While comprehensive national statistics remain elusive due to the absence of federal tracking systems, the problem is undeniable and growing[2].

In Oregon, parents seeking to protect their children are unknowingly purchasing dangerous counterfeit car seats through major online marketplaces including eBay, [Walmart.com](#), and Temu[1]. These platforms allow third-party sellers—frequently shipping from overseas—to list counterfeit products alongside legitimate manufacturers' offerings, making them virtually indistinguishable to consumers[3]. These counterfeit products entice unsuspecting Oregon families through search engine algorithms that offer dangerous, unregulated products that mimic legitimate infant safety systems that have been certified by the U.S. National Highway Traffic Safety Administration (NHTSA) at a significantly lower price point.

Child passenger safety technicians across the country report identifying one to two unregulated or counterfeit seats each month during routine safety checks[4]. At OHSU, our child injury prevention team has worked with dozens of families in the last several years who either were using, or intended to use, products that looked like legitimate car seats, replacing them with NHTSA certified products. Multiple states including New York, Connecticut, and Pennsylvania issued consumer alerts in 2025 warning parents about this rising threat[5][6].

The Oregon context is particularly concerning. Under Oregon law (ORS 811.210), children must be properly restrained in approved child safety seats, with specific requirements based on age, weight, and height[7]. However, counterfeit seats do not meet the legal definition of "approved" restraint systems, meaning Oregon families using these products may believe they are complying with the law while actually placing their children in grave danger.



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The Deception: How Counterfeit Seats Reach Oregon Families

Counterfeit car seats succeed through a combination of consumer deception and marketplace failures:

Price manipulation. Counterfeit seats are priced \$200 or more below authentic products, creating powerful financial incentives for budget-conscious families[3]. When a genuine Doona infant car seat retails for \$650 (Fig. 1), a counterfeit version listed at \$270 appears to be a prudent purchase rather than a dangerous gamble.

Fig. 1

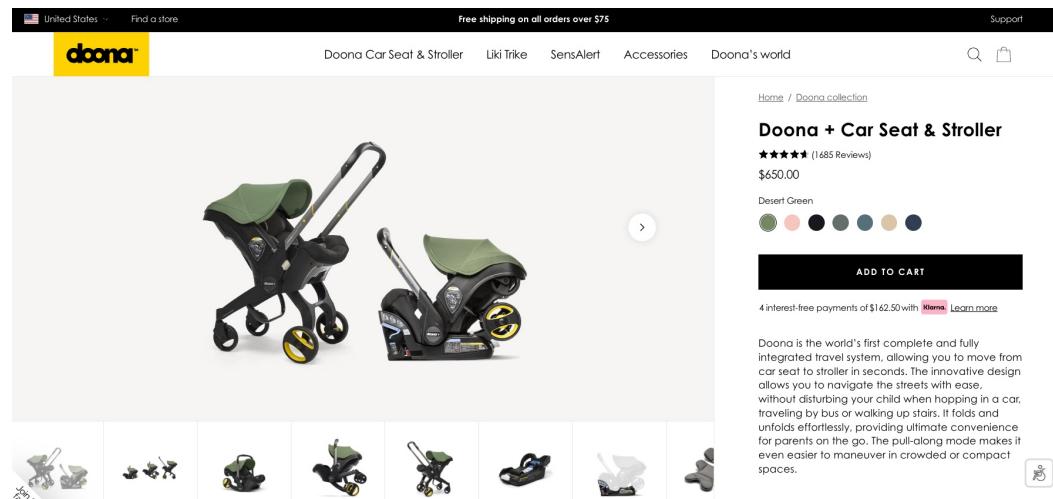
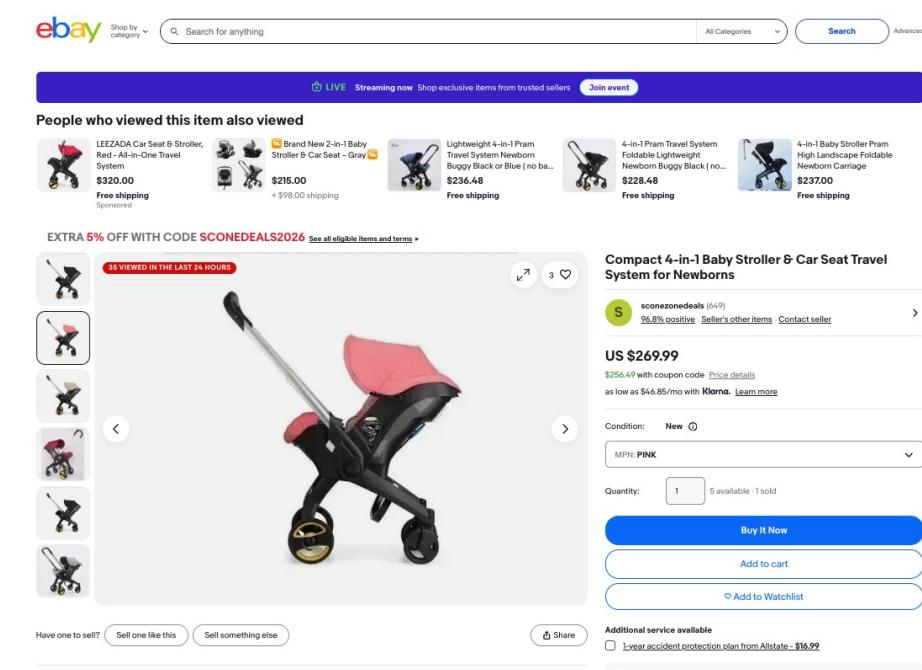


Fig. 2





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Brand impersonation. Counterfeit listings duplicate images, descriptions, and branding from legitimate manufacturers, making them appear authentic to unsuspecting consumers.

Platform trust. Oregon families assume that products sold on major platforms like Amazon, E-Bay and WalMart are legitimate and safe[3]. This trust is systematically exploited by counterfeit sellers who leverage the reputation of these marketplaces.

Market dominance. Amazon alone captures 37.7% of U.S. e-commerce sales[3]. The scale of these platforms means that even a small percentage of counterfeit listings translates to thousands of Oregon children at risk.

Emily Thomas, manager of auto safety at Consumer Reports, stated in 2024: "Unfortunately, we are seeing more of these counterfeit car seats across online marketplaces, often through third party retailers, so not through the manufacturers themselves"[2]. This proliferation is not hypothetical—it is actively harming families in our state today.

The Danger: Catastrophic Failures and Fatal Consequences

The difference between a NHTSA compliant car seat and a counterfeit seat is literally the difference between life and death. I present three critical areas of evidence:

1. Complete Structural Failure in Crash Testing

In 2019, CNN commissioned independent crash testing of a counterfeit Doona car seat purchased from Amazon. At just 30 miles per hour—a speed consistent with many urban and residential crashes—the counterfeit seat **completely disintegrated**[3].

The crash test footage showed the toddler dummy twisting as the car seat shattered and slid forward, with plastic fragments flying through the test vehicle. A certified child passenger safety instructor who reviewed the results described them as presenting "grave danger" to children[8].

When an authentic Doona seat underwent the identical 30 mph crash test, it maintained its structural integrity and position around the dummy, demonstrating the stark difference in safety performance[3].

In 2025, ABC News conducted similar investigations, purchasing three car seats from Temu and Amazon marketed under popular brand names. All three were determined by independent experts to be non-compliant with U.S. federal safety standards[4]. These are not isolated incidents—they represent a systematic pattern of dangerous products reaching American families.

2. Federal Safety Standard Non-Compliance

All car seats sold in the United States must comply with Federal Motor Vehicle Safety Standard (FMVSS) 213, which requires rigorous crash testing and specific safety specifications[9]. Effective in 2026, the new FMVSS 213a standard requires side-impact crash testing at 30 mph[10].

Counterfeit car seats meet none of these standards. They represent an unregulated category of products that exploit the gap between federal safety requirements and marketplace enforcement. Counterfeit car seats are not crash tested. They lack both required federal certification labels and compliance documentation.



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Dr. Alisa Baer, a board-certified pediatrician and certified child passenger safety instructor, stated: "If it's a dupe of a car seat, your baby might not survive a crash that they could have survived had they been in a car seat that was a real car seat, meaning it met the U.S. safety standards"[4].

3. Material and Construction Deficiencies

Beyond crash test failures, counterfeit seats exhibit multiple structural and material defects:

- Construction from inferior, less durable materials that cannot withstand crash forces[11]
- Missing crucial safety features including proper chest clips, adequate harness systems, and energy-absorbing materials[4]
- Highly flammable padding materials that increase fire risk in post-crash scenarios[11]
- High levels of banned pollutants and toxic chemicals in textiles and plastics[2]
- Poor construction that compromises the seat's ability to retain a child within the restraint during collision[9]

The Stakes: What Oregon Stands to Lose

The evidence for the effectiveness of properly certified car seats is overwhelming and unambiguous:

- Car seat use reduces the risk for injury in a crash by **71-82%** for children, compared with seat belt use alone[12]
- NHTSA estimates that correctly used child restraints reduce fatalities by **71%** for infants younger than 1 year old and by **54%** for children 1 to 4 years old[13]
- Booster seat use reduces the risk for serious injury by **45%** for children ages 4-8, compared with seat belt use alone[12]

When a child rides in a counterfeit seat, these protective benefits vanish entirely. The child faces the same risks as a completely unrestrained passenger, despite parents believing they have provided proper protection.

Oregon Traffic Safety Context

Oregon has made significant progress in traffic safety, with preliminary 2024 data showing a meaningful 9% reduction in traffic fatalities—dropping from 587 deaths among all ages in 2023 to 538 in 2024[14]. However, traffic crashes remain a leading cause of death for children, and nationally, child traffic fatalities have increased 18% over the past five years (2019-2023), reversing decades of steady progress[15].

Between 2019 and 2023, nearly 11,000 children were killed in motor vehicle collisions in the United States—approximately 6 deaths per day[15]. In 2021, 711 children aged 12 and younger died in motor vehicle crashes, and more than 63,000 children were injured[16].

In Oregon, we have made significant progress over the last 2 decades in decreasing motor vehicle deaths for our children and adolescents. As shown in Fig. 3, while child passenger deaths in Oregon and the U.S. decreased significantly between 2003 and 2009, there has been no progress since, with death rates stagnant for the last 15 years.

Fig. 3



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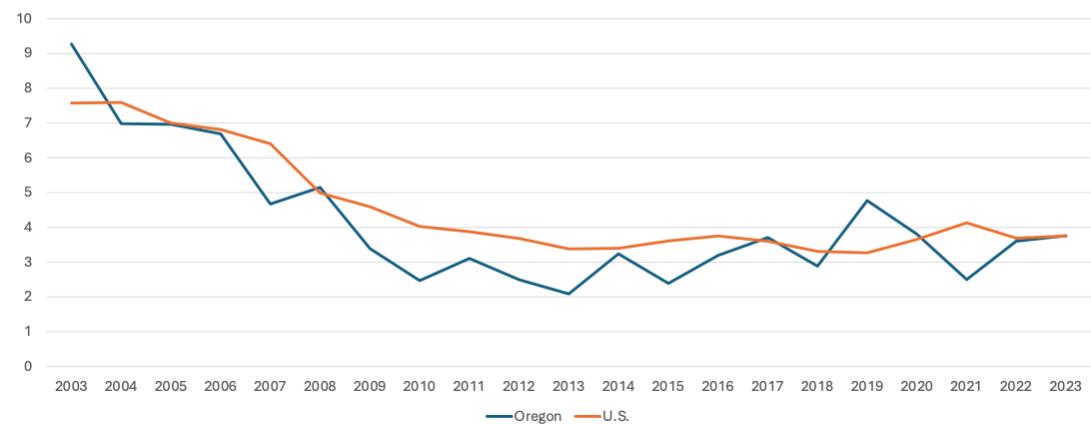
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U.S. and Oregon Motor Vehicle Deaths

Ages 0-19 years

Rate per 100,000



<https://wisesqars.cdc.gov/>

As shown in Fig. 4, the 3-year average death rates for Oregon youth decreased by over 50% between 2003 and 2005. However, there has been no change since.

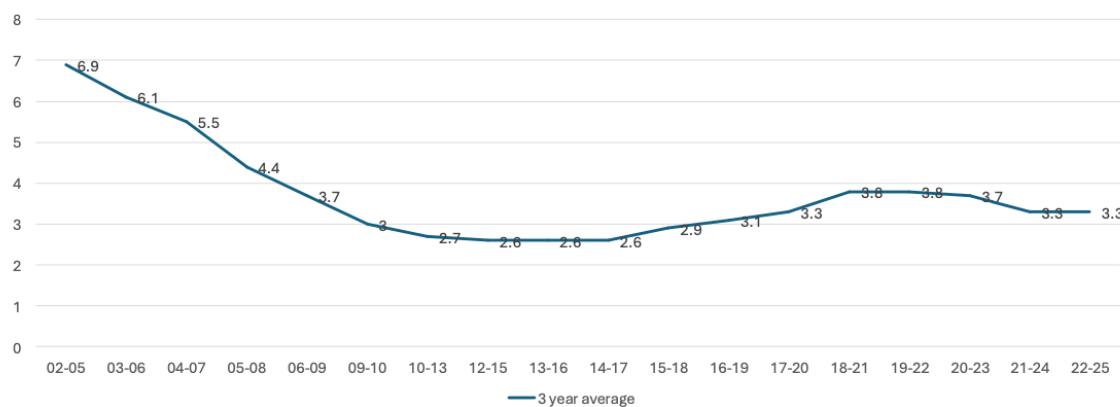
Fig 4.

Oregon Motor Vehicle Deaths

3 year Average

Ages 0-19 years

Rate per 100,000



<https://wisesqars.cdc.gov/>

Every counterfeit car seat in Oregon represents a preventable tragedy waiting to happen. Oregon families deserve better than products that provide the illusion of safety while offering none of its substance.



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Identifying Counterfeit Seats: What Oregon Families Must Know

Oregon families can protect themselves by learning to identify counterfeit seats. Healthcare providers, law enforcement, and child passenger safety technicians must be trained to recognize these critical warning signs:

Federal Compliance Label (Most Critical Indicator)

Authentic seats must display a permanently affixed label stating: "**This child restraint system conforms to all applicable Federal Motor Vehicle Safety Standards (FMVSS)**" with a yellow header. This label must include[17][18]:

- Model name or number
- Manufacturer's name, address, and telephone number
- Manufacturing date: "Manufactured In," followed by month and year or year-month-day
- Place of manufacture (city and state or foreign country)
- Minimum and maximum weight and height requirements in both English imperial and metric units
- Recall information and registration instructions

Missing Chest Clip

Child passenger safety technicians identify the missing chest clip as the "hugest red flag"[4]. U.S.-compliant seats require chest clips, while European seats do not. Any seat marketed for U.S. use without a chest clip is non-compliant.

Additional Warning Signs

- Foreign language labels without English (federal law requires English)
- Spelling and grammatical errors on labels, warnings, or instruction manuals
- Missing car seat manual or registration recall card
- Incomplete manufacturer information
- Prices significantly below manufacturer's suggested retail price
- Third-party sellers, especially those shipping from overseas

Oregon's Legal and Regulatory Framework

Oregon's current child passenger safety law (ORS 811.210) establishes important protections:

- Children must be restrained in an approved child safety seat until they weigh 40 pounds
- Infants must ride rear-facing until they reach two years of age
- Children over 40 pounds who have reached the upper weight limit of their forward-facing car seat's harness system must use a booster seat until they are at least 4'9" tall and age 8[7]



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However, Oregon's law does not explicitly address counterfeit or non-compliant car seats, nor does it establish mechanisms for identifying, removing, or penalizing the sale of such products within our state.

Oregon faces a critical gap: our law requires approved child safety seats, but provides no enforcement mechanism against the sale of unapproved, counterfeit seats that deceive Oregon families.

The Urgency of Action

Members of the committee, I want to be absolutely clear about what is at stake: **Oregon children are riding in counterfeit car seats that will disintegrate in crashes that they would likely survive in a NHTSA-approved car seat or booster seat.**

These are not theoretical risks—they are documented, tested, and verified dangers. When CNN crash-tested a counterfeit seat at 30 mph, it shattered. When Oregon families place their children in these seats and drive on or roads and highways, they are one collision away from discovering that the safety equipment they believed they could trust offers no protection whatsoever.

The New York Department of State's Division of Consumer Protection stated it clearly: "The money saved on an illegitimate car seat is never worth the cost of a child's life"[5].

Oregon has an opportunity—and I would argue an obligation—to lead on this issue. We can establish the strongest consumer protections in the nation for child safety equipment. We can create the most comprehensive identification and enforcement systems. We can ensure that every Oregon family knows how to recognize and avoid these dangerous products.

Conclusion

Counterfeit car seats represent a clear and present danger to Oregon's children. These products bypass decades of safety research, federal regulations, and rigorous testing standards—protections that have saved thousands of children's lives. They exploit parental trust, marketplace gaps, and economic pressures to place our most vulnerable passengers at catastrophic risk.

Oregon families deserve better. Our children deserve better. The evidence before you today demonstrates that counterfeit car seats fail completely and catastrophically. They provide the illusion of safety while offering none of its substance. They turn vehicles into death traps for the children whose parents believed they were doing everything right.

I urge this committee to take action through HB 4092, including an amendment that would lift any weight limits. Protect Oregon families from counterfeit car seats through enhanced consumer protection legislation, public awareness campaigns, provider training, data collection, and expanded access to compliant safety equipment.

Thank you for your time and consideration. I welcome any questions from the committee and stand ready to provide additional information or technical assistance as you move forward on this critical issue.

A handwritten signature in black ink, appearing to read "Benjamin Hoffman".

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