



December 30, 2008

Office of the Secretary  
Consumer Product Safety Commission  
Room 502  
4330 East-West Highway,  
Bethesda, Maryland, 20814  
[Sec102ComponentPartsTesting@cpsc.gov](mailto:Sec102ComponentPartsTesting@cpsc.gov)  
fax: (301) 504-0127

Re: Section 102 Mandatory Third-Party Testing of Component Parts

Dear Mr. Stevenson:

On behalf of the [Handmade Toy Alliance](#), an alliance of 127 toy stores, toymakers and children's product manufacturers from across the country, who want to preserve unique handmade toys, clothes and all manner of children's goods in the USA, we respectfully request the CPSC adopt rules under the Consumer Product Safety Improvement Act to allow for component testing certification. Our reasoning is simple and is herein outlined.

First, the reasoning behind the exclusion of "natural materials" in the proposed rulemaking on 12/24/08 sets forth the idea that the CPSC believes that the risk that a piece of wood, cotton or wool by itself could become contaminated with lead during storage and manufacturing is minimal. The same reasoning should apply to all other materials that have been properly tested before being made into a finished product.

Second, if the same material is used by multiple manufacturers in different ways and certification has been supplied stipulating that said material meets CPSIA standards, to test the same material multiple times adds exponential and unnecessary expense to the process, without any added safety benefit.

Third, Sec. 102 of the law reads "...based on a test of each product or upon a reasonable testing program...". It should thereby be reasonable to test a paint, zipper, fabric, snap, etc. once, regardless of how many products it appears on, and it is reasonable to test a mechanical design once, regardless of how many versions it is decorated into.

Fourth, materials-based certification is also used in other industries, including Organic food certification. Therefore, component testing is already a federally recognized and reliable method, to ensure the overall end product's safety for consumers.

To further illustrate our point, take for example, a children's accessories manufacturer who may use fabrics like cotton and polyester, cotton thread and polyester fiberfill, with no or very low total lead, to make many different products in the company's line. Consider also, that this company's "batch" generally consists of 10 items or less. As the law currently reads, this manufacturer would need to independently test one of the 10 in the batch with a third party testing facility at a cost of \$400 - \$1000 (depending on the lab), despite the fact that the components involved may have already been tested, and certifications are available to this small manufacturer. This company will be forced to close its doors on 2/10/09 without the CPSC's intervention.

We suggest that component testing would be in line with the CPSC's statement that there is little to no risk of wood, cotton, or wool becoming contaminated with lead during storage and manufacturing. Furthermore, the owners of our companies are personally involved in every aspect of production, from procurement to storage, design, and assembly. The scale of our businesses does not permit outsourcing or loss of control over the production process. Therefore, changes in inventory control practices would be unnecessary for our manufacturers. The Commission may find it advisable to require larger manufacturers to adopt specific inventory control and lot-to-lot tracking provisions, but we feel that these requirements would be burdensome and prohibitive for our small manufacturers.

The businesses represented by our alliance are small, often family owned, operations. Many of them provide a substantial and important income stream for the families that operate them. Many are retired workers or stay at home mothers who are supplementing their incomes through crafts. As a group, we fully support all government efforts to safeguard consumers and reduce their exposure to lead or other materials that could affect their health and safety, based on sound scientific principles. We also acknowledge that our members have been setting, and adhering to, high safety standards in children's products for many years. The use of component testing would allow many of us to remain in business, while adhering to the current regulations outlined in the CPSIA.

Respectfully Submitted,

The Handmade Toy Alliance

A complete list of our member businesses follows:

A Child's Garden <http://www.achildsgardennoho.com/> Toy Retailer Massachusetts  
All the Numbers Handmade <http://www.allthenumbers.etsy.com> Children's Product Manufacturer  
Massachusetts  
American Toy LLC <http://americantoy.com/> Toymaker Oregon  
Baby Bean Vintage Daywear <http://www.babybeanwear.com> Children's Product Manufacturer TX  
Baby Leo Designs <http://www.babyleodesigns.com/> Children's Product Manufacturer CA  
Basket of Gifts <http://www.basketofgiftonline.com/> Toymaker  
BEKA, Inc. <http://bekainc.com> Toymaker Minnesota  
Blossom Toys <http://www.blossomtoys.com/> Toymaker Massachusetts  
Bright Penguin <http://www.brightpenguin.com> Toy Retailer Texas  
Bruce Wolk, author of Made Here, Baby! <http://www.madeherebaby.com> Journalist / Blogger  
Busy Little Elf <http://busylittleelf.etsy.com> Toymaker Ohio  
Camden Rose Toys <http://camdenrose.com> Toymaker Michigan  
Cars From Papa <http://carsfrompapa.com> Toymaker California  
Chalais Associates <http://www.chalaisassociates.com> Toymaker's Rep California

Challenge and Fun <http://www.challengeandfun.com> Toy Importer Massachusetts  
Chocolate Soup <http://chocolatesouptoy.com> Toy Retailer New Jersey  
Chubby Cheek Boutique <http://www.chubbycheekboutique.com> Children's Product Manufacturer  
Wisconsin  
Clementine NW <http://www.clementinenw.com> Toy Retailer Oregon  
Cool Mom Picks <http://coolmompicks.com> Journalist / Blogger  
Craftsbury Kids <http://www.craftsburykids.com> Toy Retailer Vermont  
Crafty Baby <http://www.craftybaby.com> Children's Product Manufacturer Connecticut  
Cubic Dissection <http://www.cubicdissection.com> Toymaker North Carolina  
Cuckoo Boo <http://www.cuckoo Boo.com/> Toymaker North Carolina  
D and Me Toys <http://www.dandmewoodtoys.com> Toymaker Montana  
Dirty Peaches Clothing Co. <http://dirtypeaches.etsy.com> Children's Product Manufacturer FL  
Down To Earth Trading Co. <http://www.DownToEarthToys.com> Toy Retailer Michigan  
Dragon's Toy Box <http://www.dragonstoybox.net> Toy Retailer Washington  
Early Work Station <http://www.earlywork.com/> Toy Retailer California  
Earnest Efforts Toys <http://www.earnestefforts.com/> Toymaker Oregon  
Earthetarian <http://Earthetarian.com> Toymaker Connecticut  
Ecoleeko <http://www.ecoleeko.com> Toymaker New York  
Elevenish <http://www.elevenish.etsy.com> Children's Product Manufacturer California  
Ellie Bellie Kids <http://www.elliebelliekids.com/> Toymaker  
Erica Daley <http://www.ericadaley.com> Toymaker Maryland  
Fairy Finery <http://www.fairyfinery.com> Toymaker Minnesota  
Firewood Toys Toymaker New Hampshire  
For My Kids <http://www.ForMyKidsOnline.com> Children's Product Manufacturer Texas  
Frill 'er Up Couture <http://www.frillerupcouture.com/> Children's Product Manufacturer MI  
Fuzbaby <http://www.fuzbaby.com> Toymaker Utah  
Glückskäfer Kinderwelt <http://www.glueckskaefer.info> Toymaker Germany  
Greco Woodcrafting <http://www.GrecoWoodcrafting.com> Toymaker New Jersey  
Greenjeans <http://www.greenjeansbrooklyn.blogspot.com/> Toy Retailer New York  
Green Little Beans <http://www.greenlittlebeans.com/> Toymaker Florida  
Grimm's GmbH, Spiel & Holz Design <http://www.grimms.eu> Toymaker Germany  
Happy Squash Toys <http://hyenacart.com/happysquashtoy/> Toymaker Ohio  
Hasenpfeffer <http://hasenpfeffer.etsy.com> Toymaker Washington  
hatched <http://hatchedboston.com> Toy Retailer Massachusetts  
Hilltown Families <http://www.HilltownFamilies.org> Journalist / Blogger Massachusetts  
Hopscotch Childrens Store Toy Retailer Michigan  
Hullabaloo Boutique <http://www.hullabalooBoutique.etsy.com> Children's Product Manufacturer PA  
Imagination Box Company <http://www.imaginationboxco.com> Toymaker Idaho  
impish <http://www.shop-impish.com/> Toy Retailer Massachusetts  
INQUISITIVEkid <http://INQUISITIVEkid.com> Toy Retailer Canada  
inspired mama creations inspired mama creations etsy page Toymaker Idaho  
KangarooBoo <http://KangarooBoo.com> Toy Retailer Iowa  
Lily Bean <http://www.lillybeanmarket.com> Toymaker Michigan  
Lindenwood Toys (Uncle Goose) <http://www.lindenwoodinc.com/> Toymaker Michigan  
Little Alouette <http://www.littlealouette.etsy.com> Toymaker Ohio  
Little Ants, Inc. <http://www.littleants.com/> Toy Retailer Indiana  
Little Sapling Toys <http://www.littlesaplingtoys.com/> Toymaker California  
Living Playing <http://www.livingplaying.com/> Toy Retailer Massachusetts  
Lundebys Eco Baby <http://www.lundebys.com/> Toy Retailer Oklahoma  
Made by Ewe <http://www.madebyewe.etsy.com/> Toymaker New Jersey  
Mamanista <http://www.mamanista.com/> Journalist / Blogger  
Mama Roots [http://www.etsy.com/shop.php?user\\_id=5484968](http://www.etsy.com/shop.php?user_id=5484968) Toymaker Missouri  
Mama's Little Monkeys <http://www.mamaslittlemonkeys.com> Toymaker California  
Mini Monster Baby Boutique <http://MiniMonster.etsy.com> Toymaker Virginia

Miscellaneous Oddiments <http://www.mythicaldesigns.com> Toymaker Maryland  
Nato Bello <http://www.natobello.com> Children's Product Manufacturer Michigan  
Natural Pod <http://www.naturalpod.com> Toymaker Canada  
Nest Maternity and Baby <http://www.nestmaternityandbaby.com> Toy Retailer New Hampshire  
New Hampshire Toy Factory <http://nhmade.com/listdetail.cfm?recordID=368> Toymaker NH  
Noble Dolls <http://www.nobledolls.com/> Toymaker Pennsylvania  
North Star Toys <http://www.northstartoys.com> Toymaker New Mexico  
Nova Natural Toys <http://novanatural.com> Toy Retailer Vermont  
Old School Acres <http://oldschoolacres.typepad.com/> Toymaker  
Oliebollen <http://www.oliebollen.com> Toy Retailer Michigan  
Ozarkana <http://www.Ozarknana.Etsy.com> Toymaker Missouri  
Papa Don's Toys Toymaker Oregon  
Pea Pie Baby <http://www.peapiebaby.com/> Toy Retailer Florida  
Peapods Natural Toys <http://peapods.com> Toy Retailer Minnesota  
Phil Barbato <http://philbarbato.com/> Toymaker Virginia  
Piggy Roo Toys & Gifts <http://www.piggyroo.com> Toy Retailer Colorado  
Play Store Toys <http://www.playstoretoys.com/> Toy Retailer California  
Purcell Toys <http://purcelltoys.com/> Toymaker Georgia  
Quiet Hours Toys <http://www.quiethourtoys.com> Toy Retailer Pennsylvania  
Rebekah's Bowtique <http://rebekahsbowtique.com> Children's Product Manufacturer NC  
Rosie Hippo <http://rosiehippo.com> Toy Retailer New York  
Sakura Bloom <http://sakurabloom.com/> Children's Product Manufacturer Massachusetts  
Sarah's Silks <http://sarahssilks.com> Toymaker California  
Sara's Toy Box <http://saras-toy-box.blogspot.com/> Journalist / Blogger  
Seasons Natural Toys <http://www.seasonsnaturaltoys.com> Toy Retailer Florida  
Shoparooni <http://www.shoparooni.com/> Toy Retailer Ohio  
Silken Sky <http://www.silkensky.com> Toymaker Massachusetts  
Small Magazine <http://www.smallmagazine.net> Journalist / Blogger Texas  
Sole Mate Toys <http://solematetoys.com> Toymaker Louisiana  
Specialty Toys Network <http://www.stoysnet.com> Toy Industry Group Nationwide  
Star Bright Baby <http://www.starbrightbaby.etsy.com> Toymaker Pennsylvania  
Starlight Arts <http://www.starlightarts.com/> Toymaker Montana  
Sullivan Toy Company [http://www.etsy.com/shop.php?user\\_id=26868](http://www.etsy.com/shop.php?user_id=26868) Toymaker Oklahoma  
Sweet Pea's Loft <http://www.sweetpeasloft.com> Toy Retailer Minnesota  
TAG Toys <http://tagtoys.com> Toymaker California  
Tedde <http://tedde.com> Toymaker New York  
The Baby Gardener <http://TheBabyGardner.com> Children's Product Manufacturer Alabama  
The Little Seedling / Tree City Diapers <http://www.treecitydiapers.com> Toy Retailer Michigan  
The Lucky Pebble <http://www.theluckypebble.com> Toymaker Hawaii  
The Mommy Spot <http://dkmommypot.com/> Journalist / Blogger  
The Pajama Squid <http://shop.thepajamasquid.com/> Toy Retailer Maryland  
The Snuggle Herd <http://www.snuggleherd.com> Toymaker Texas  
The Urban Thimble <http://www.theurbanthimble.etsy.com/> Toymaker Illinois  
The Wee Loft <http://www.theweeloft.com> Toy Retailer California  
The Wooden Wagon <http://www.thewoodenwagon.com> Toy Retailer Massachusetts  
Three Sisters Toys <http://ThreeSistersToys.com> Toy Retailer Florida  
Treehouse in the Glen <http://www.toyskidslovenaturally.com/> Toy Retailer California  
Tummba <http://www.tummba.com> Children's Product Manufacturer Colorado  
Turtle Park Tots <http://turtleparktots.etsy.com> Children's Product Manufacturer Colorado  
Ugga Mugga <http://www.uggamugga.com> Journalist / Blogger Wisconsin  
Victoria Velting <http://www.victoriavelting.etsy.com> Children's Product Manufacturer MI  
Walking Stick Toys <http://www.walkingsticktoys.com> Toy Retailer Montana  
Wondermommy <http://wondermommy.etsy.com> Toymaker Alabama  
Wood Toy Shop <http://woodtoyshop.com/> Toymaker Oregon

Woolies <http://woolies.etsy.com> Toymaker Arizona  
World of Mirth <http://www.worldofmirth.com/> Toy Retailer Virginia  
World's Greatest Bath Boats <http://bathboats.com> Toymaker Minnesota  
XoXoa Baby, LLC. <http://xoxoababy.blogspot.com/> Children's Product Manufacturer  
Zadyball <http://www.zadyball.com> Toymaker Arizona  
Zid Zid Kids <http://zidzid.com> Toymaker Massachusetts / Morocco