



January 11, 2009

To: Consumers Union, Consumer Federation of America, Kids in Danger, National Research Center for Women & Families, Public Citizen, Union of Concerned Scientists, U.S. Public Interest Research Group

CC: Honorable Nancy Nord, Chairman U.S. Consumer Product Safety Commission; Members of Senate Commerce Committee; Members of the House Energy & Commerce

From: The Handmade Toy Alliance

To the leadership of the above advocacy groups:

This letter is in response to your combined letter to the Honorable Nancy Nord, Chairman of the CPSC.

We read with interest your letter regarding implementation of the Consumer Product Safety Improvement Act (CPSIA). Our alliance, which represents a growing list of 186 small businesses who make, import, or sell children's products, is very concerned about the impact of the CPSIA on our livelihoods. As parents, grandparents, and citizens, however, we are also concerned about poisonous or dangerous products that have been sold to the American public.

Your letter addressed the issue of misinformation regarding the costs of testing to comply with the CPSIA. We truly wish that the concern over the impact of the CPSIA was merely a reaction to misinformation. However, let us assure you that the testing costs published by us and reported in news accounts we have seen are based on actual quotes and bills from certified testing labs for actual products. We have seen costs ranging from \$300 for a typical clothing item to \$24,000 for a children's telescope. To avoid hyperbole, we have stated the costs as ranging from \$300 to \$4,000 per item, which we feel is an accurate assessment of the quotes our members have received.

Furthermore, we do not require a government-sponsored education campaign to inform us of the "typical costs of testing". This information we have already learned for ourselves. We would very much like to open a dialogue with your organizations so that we might discuss any other misinformation that you may wish to address.

Which brings us to the greater purpose of this letter, which is to ask for your cooperation in improving the CPSIA. We believe strongly that the motivations of our business members and the motivations of your organizations are entirely aligned: to provide higher quality and safer products for children. Every single one of our members entered the marketplace

for this reason, and many of us actively sought reform of consumer safety laws after the 2007 recalls.

We also believe that it was neither your intention nor the intention of Congress to construct a law that would be impossible for responsible small businesses to comply with. Nor do we believe that the intent was to make the law so broad that the CPSC would be unable to focus on the substances which have caused the greatest concern: lead in paint, lead in jewelry, and lead and phthalates in plastics.

However, this lack of focus and the harm to small businesses currently loom large as the greatest impact of the CPSIA thus far, a fact which is exacerbated by the aggressive timelines for implementation of the law and the fact that additional resources provided to the CPSC under the law have not yet been allocated.

Simply put, the law's redundancy of testing requirements and its severe economic impact have overshadowed its original intent.

We therefore ask for your support to promote the following ideas:

- The list of natural materials excluded from testing by the CPSC should be greatly expanded according to our letter to the CPSC, which is available at <http://www.handmadetoyalliance.org/document-to-share/HTACommentsonNaturalMaterials.pdf>
- Manufacturers should be allowed to rely upon component-based testing so that they will not be required to re-test materials such as zippers, screws, snaps, fabric, etc., but may instead rely on certifications from the manufacturers of these materials. We believe strongly that allowing upstream testing for materials will dramatically reduce the risk of hazardous materials entering the marketplace and reduce testing costs exponentially.
- Micro-businesses and one-of-a-kind items should be exempted from testing requirements. This change would save thousands of handcrafters who make everything from knit baby booties to ceremonial Native American children's costumes. We feel this exemption will not compromise public safety, particularly if component testing is allowed, which would automatically ensure compliance for thousands of downstream crafters.
- The additional funding to the CPSC provided by the CPSIA should be immediately allocated so that the agency can better focus on rulemaking and providing clarity to the dozens of issues which remain unaddressed.
- Congress and the CPSC should make clear that non-toy children's books and uncoated fabrics, which have zero history of lead contamination, should be exempt from testing requirements.

We believe strongly that the result of implementing these changes would be an increased ability for the CPSC to ensure public safety while also sparing thousands of responsible small businesses. We also believe that these changes will prevent a future backlash under different political circumstances which might gut the law much more thoroughly.

Whether or not your organizations are able to support the ideas we have outlined above, we strongly encourage you to initiate a dialogue with our alliance. As stated, we truly believe that our goals and priorities are almost entirely aligned. Please write to us at [info@handmadetoyalliance.org](mailto:info@handmadetoyalliance.org) to initiate the discussion.

Let's work together to create a CPSIA that works and isn't derailed by unintended consequences.

Sincerely,

The Handmade Toy Alliance

Members of the Handmade Toy Alliance are:

A Child's Garden	Toy Retailer	Massachusetts
AHA(T)2 - All Harwood All the Time	Toymaker	Nebraska
All the Numbers Handmade	Children's Product Manufacturer	Massachusetts
American Toy LLC	Toymaker	Oregon
A Toy Garden	Toy Retailer	California
Baby Bean Vintage Daywear	Children's Product Manufacturer	Texas
Baby Leo Designs	Children's Product Manufacturer	California
Bagnall Woodworks	Toymaker	Texas
Basket of Gifts	Toymaker	Maryland
Bazbies by Gigi	Toymaker	Utah
BEKA, Inc.	Toymaker	Minnesota
Bella Luna Toys	Toy Retailer	California
Birdsong Bows	Children's Product Manufacturer	Indiana
Blessed Baby Boutique	Toy Retailer	Maine
Blossom Toys	Toymaker	Massachusetts
Bright Penguin	Toy Retailer	Texas
Brittany's Boutique	Children's Product Manufacturer	Missouri
Bruce Wolk, author of Made Here, Baby!	Journalist / Blogger	
Bunny & Bee	Children's Product Manufacturer	California
Busy Little Elf	Toymaker	Ohio
Camden Rose Toys	Toymaker	Michigan
Carseat Couture	Children's Product Manufacturer	Kansas
Cars From Papa	Toymaker	California
Chalais Associates	Toymaker's Rep	California
Challenge and Fun	Toy Importer	Massachusetts
Charli'z	Children's Product Manufacturer	
Chasing Birdies	Toymaker	Texas
Chocolate Soup	Toy Retailer	New Jersey
Chubby Cheek Boutique	Children's Product Manufacturer	Wisconsin
CLAUSson Toys	Toymaker	California
Clementine NW	Toy Retailer	Oregon
Cool Mom Picks	Journalist / Blogger	

Craftsbury Kids	Toy Retailer	Vermont
Crafty Baby	Children's Product Manufacturer	Connecticut
Creative Brains	Toy Retailer	Texas
Cubic Dissection	Toymaker	North Carolina
Cuckooboo	Toymaker	North Carolina
D and Me Toys	Toymaker	Montana
Diaper Cakes by Becca	Children's Product Manufacturer	Arizona
Dirty Peaches Clothing Co.	Children's Product Manufacturer	Florida
Down To Earth Trading Co.	Toy Retailer	Michigan
Dragon's Toy Box	Toy Retailer	Washington
Early Work Station	Toy Retailer	California
Earnest Efforts Toys	Toymaker	Oregon
Earthetarian	Toymaker	Connecticut
Easy to Love Toys	Toymaker	Pennsylvania
Ecoleeko	Toymaker	New York
Edley Associates, Inc.	Children's Product Manufacturer	New York
Elevenish	Children's Product Manufacturer	California
Ellie Bellie Kids	Toymaker	
Erica Daley	Toymaker	Maryland
Estella Baby Boutique	Children's Product Retailer	New York
Fairy Finery	Toymaker	Minnesota
Firewood Toys	Toymaker	New Hampshire
For My Kids	Children's Product Manufacturer	Texas
Frill 'er Up Couture	Children's Product Manufacturer	Michigan
Frog Kiss Designs	Children's Product Manufacturer	Connecticut
Fuzbaby	Toymaker	Utah
Girl Party Tutus	Children's Product Manufacturer	Michigan
Glückskäfer Kinderwelt	Toymaker	Germany
Grandpa's House	Toy Retailer	Tennessee
Greco Woodcrafting	Toymaker	New Jersey
Greenjeans	Toy Retailer	New York
Green Little Beans	Toymaker	Florida
Grimm's GmbH, Spiel & Holz Design	Toymaker	Germany
Happy Squash Toys	Toymaker	Ohio
Hasenpfeffer	Toymaker	Washington
hatched	Toy Retailer	Massachusetts
Hilltown Families	Journalist / Blogger	Massachusetts
Honeysuckle Dreams	Toymaker	Maryland
Hopscotch Childrens Store	Toy Retailer	Michigan
Hullabaloo Boutique	Children's Product Manufacturer	Pennsylvania
Imagination Box Company	Toymaker	Idaho
impish	Toy Retailer	Massachusetts
INQUISITIVEkid	Toy Retailer	Canada
inspired mama creations	Toymaker	Idaho
I Used To Be A Tree	Toy Retailer	Massachusetts
KangarooBoo	Toy Retailer	Iowa
Keiki Kuddlerz	Children's Product Manufacturer	Hawaii
Kidcessory Haven	Children's Product Manufacturer	Florida
Kooky Dolls / LolaBEE	Toymaker	Wyoming

Kung Fu Bambini	Children's Product Manufacturer	Oregon
Kunklebaby	Children's Product Manufacturer	Ohio
Lexi's Toy Box	Toy Retailer	Michigan
Liliputians NYC	Children's Product Retailer	New York
Lily Anna for Girls	Toymaker	Utah
Lily Bean	Toymaker	Michigan
Lindenwood Toys (Uncle Goose)	Toymaker	Michigan
Little Alouette	Toymaker	Ohio
Little Ants, Inc.	Toy Retailer	Indiana
Little Sapling Toys	Toymaker	California
Living Playing	Toy Retailer	Massachusetts
Lundeby's Eco Baby	Toy Retailer	Oklahoma
MacGregor Historic Games	Toymaker	Minnesota
Made by Ewe	Toymaker	New Jersey
Mamanista	Journalist / Blogger	
Mama Roots	Toymaker	Missouri
Mama's Little Monkeys	Toymaker	California
MARYland Seamstress	Children's Product Manufacturer	Maryland
Mary's Country Craft Corner	Toy Retailer	South Carolina
MBroidery Creations	Children's Product Manufacturer	Michigan
Milagros Boutique	Children's Product Retailer	Oregon
Mini Monster Baby Boutique	Toymaker	Virginia
Miscellaneous Oddiments	Toymaker	Maryland
Monkey Pork Bun	Children's Product Manufacturer	California
More4Kids	Toy Retailer	Tennessee
Mother's Moon Natural Care & Products	Children's Product Retailer	Maine
Nato Bello	Children's Product Manufacturer	Michigan
Natural Pod	Toymaker	Canada
Nest Maternity and Baby	Toy Retailer	New Hampshire
New Hampshire Toy Factory	Toymaker	New Hampshire
Noble Dolls	Toymaker	Pennsylvania
North Star Toys	Toymaker	New Mexico
Nova Natural Toys	Toy Retailer	Vermont
Oakland Ballistics	Toymaker	Michigan
Ogunquit Wooden Toy	Toymaker	Maine
Old School Acres	Toymaker	
Oliebollen	Toy Retailer	Michigan
Olive & Ollie	Children's Product Manufacturer	Ohio
Ozarkana	Toymaker	Missouri
Papa Don's Toys	Toymaker	Oregon
Pea Pie Baby	Toy Retailer	Florida
Peapods Natural Toys	Toy Retailer	Minnesota
Phil Barbato	Toymaker	Virginia
Piccolo Necklaces	Children's Product Manufacturer	Pennsylvania
Piggy Roo Toys & Gifts	Toy Retailer	Colorado
Play Store Toys	Toy Retailer	California
Purcell Toys	Toymaker	Georgia
Quiet Hours Toys	Toy Retailer	Pennsylvania

Rebekah's Bowtique	Children's Product Manufacturer	North Carolina
Rich Aaron, children's book author	Concerned Citizen	
Rosie Hippo	Toy Retailer	New York
Sakura Bloom	Children's Product Manufacturer	Massachusetts
Sarah's Silks	Toymaker	California
Sara's Toy Box	Journalist / Blogger	
Seaons Natural Toys	Toy Retailer	Florida
Shoparooni	Toy Retailer	Ohio
Silken Sky	Toymaker	Massachusetts
Silly Kitty	Toymaker	Wisconsin
Small Magazine	Journalist / Blogger	Texas
Sole Mate Toys	Toymaker	Louisiana
Specialty Toys Network	Toy Industry Group	Nationwide
SpeilWerk Toys	Toy Retailer	Oregon
stacyJean	Toymaker	California
Star Bright Baby	Toymaker	Pennsylvania
Starlight Arts	Toymaker	Montana
Sullivan Toy Company	Toymaker	Oklahoma
Sunrise Hill Decor	Toymaker	North Dakota
Sweet Pea's Loft	Toy Retailer	Minnesota
TAG Toys	Toymaker	California
Tedde	Toymaker	New York
The Baby Gardener	Children's Product Manufacturer	Alabama
The Giving Tree Store by Catholic Community Services	Toy Retailer	Washington
The Little Seedling / Tree City Diapers	Toy Retailer	Michigan
The Lucky Pebble	Toymaker	Hawaii
The Mommy Spot	Journalist / Blogger	
The Natural Baby Catalog	Children's Product Retailer	Ohio
The Pajama Squid	Toy Retailer	Maryland
These Are the Salad Years	Journalist / Blogger	
The Snuggle Herd	Toymaker	Texas
The Toy Factory	Toy Retailer	Oregon
The Urban Thimble	Toymaker	Illinois
The Wee Loft	Toy Retailer	California
The Wooden Wagon	Toy Retailer	Massachusetts
Three Sisters Toys	Toy Retailer	Florida
Tidbit Couture	Children's Product Manufacturer	Pennsylvania
Toys and Dolls Made in USA	Toymaker	Montana
Treehouse in the Glen	Toy Retailer	California
Tummba	Children's Product Manufacturer	Colorado
Turlte Park Tots	Children's Product Manufacturer	Colorado
Turtle Monkey Bug	Toymaker	Oregon
Ugga Mugga	Journalist / Blogger	Wisconsin
Victoria Velting	Children's Product Manufacturer	Michigan
Wabi Sabi Wonders	Toymaker	Illinois
Walking Stick Toys	Toy Retailer	Montana
Wildflower Diapers	Children's Product Retailer	Arizona

Wondermommy	Toymaker	Alabama
Wood that's Fun	Toymaker	Wisconsin
Wood Toy Shop	Toymaker	Oregon
Woolies	Toymaker	Arizona
World of Mirth	Toy Retailer	Virginia
World's Greatest Bath Boats	Toymaker	Minnesota
XoXoa Baby, LLC.	Children's Product Manufacturer	
Yo-Yo Joe's Toys and Fun	Toy Retailer	Deleware
Zadyball	Toymaker	Arizona
		Massachusetts /
Zid Zid Kids	Toymaker	Morrocco

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