

**STATEMENT OF THE HONORABLE THOMAS H. MOORE  
ON THE STATEMENT OF INTERIM ENFORCEMENT POLICY  
FOR CHILDREN'S METAL JEWELRY CONTAINING LEAD**

**February 1, 2008**

**The Commission is in a rulemaking proceeding dealing with lead in children's jewelry and it is my position that we should not be issuing policy statements that appear to prejudge any aspect of that rulemaking. As the proposed Federal Register notice does not give the rationale as to why the change in testing and accessibility level is being made, I am not sure what seeking comments on the policy will achieve, other than giving manufacturers and importers a period of time to adjust prior to the testing change taking effect.**

**The current interim enforcement policy was issued by Compliance in 2005 and any changes to it should also come from the Office of Compliance, which can proceed to issue it without delay.**