

Advocacy Brings Industry Concerns to the Attention of the Consumer Product Safety Commission by Commenting on the Tracking Labels for Children’s Products Notice of Inquiry

- On April 27, 2009, the Office of Advocacy (Advocacy) filed a comment letter with the Consumer Product Safety Commission (CPSC) concerning a notice of inquiry published in the *Federal Register* on tracking labels for children’s products under section 103 of the Consumer Product Safety Improvement Act (CPSIA). A complete copy of Advocacy’s comment letter may be accessed at <http://www.sba.gov/advo/laws/comments>.
- On February 26, 2009, the CPSC published a notice of inquiry (notice) in the *Federal Register* titled, “Tracking Labels for Children’s Products Under section 103 of the Consumer Product Safety Improvement Act; Request for Comments.” (74 Fed. Reg. 8781, February 26, 2009). The notice sought public comment on the implementation of section 103 of CPSIA, which requires manufacturers to place permanent, distinguishing marks on children’s products and packaging to facilitate recalls in the event of an emergency.
- Advocacy heard from numerous small businesses that are concerned about the cost of compliance with the labeling rule. Advocacy asked the CPSC to comply with section 603 of the RFA by completing an Initial Regulatory Flexibility Analysis (IRFA) which would provide data on the costs of the rule on small entities. Advocacy also asked the CPSC to entertain and study reasonable alternatives that would serve to minimize the impact of the regulation on those small entities. Lastly, Advocacy asked the CPSC to allow small entities some flexibility in determining what is practical regarding the location, nomenclature, appearance and arrangement of information on labels.

For more information, visit Advocacy’s web page at www.sba.gov/advo or contact Linwood Rayford at (202) 205-6533.
