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CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207

OCT 1 0 1974

Ms. Joyce Lambert
Assistant to the President
Friends of Animals, Inc.
11 West 60th Street
New York, N. Y. 10023

Dear Ms. Lambert:

Thank you for your letter of September 5, 1974 which Commissioner Barbara H. Franklin sent to me for reply. Your letter raises the interesting point that small animals as well as children are subject to injury from certain kinds of consumer products. You inquire whether the Commission's activities in product safety also extend to animal safety.

We enclose a copy of the Consumer Product Safety Act for your information, and call to your attention section 2(b) on the purposes of the Act, and section 3(a)(1) which defines a consumer product. In reading these two sections, it is apparent that Congress intended to protect the public against unreasonable risks of injury which could result from certain products. Further, the definition of consumer product states specifically that these products are for use by consumers. In ordinary, as well as legal parlance, the word "public" refers to people and the word "consumer" refers to a person; neither of these words can be construed to encompass animals. Therefore, it does not appear that the protections of the Act can be extended to pets and other small animals.

It is interesting to note, however, that pet safety appears to be an additional advantage that can accrue from safe consumer products. For example, the Commission plans, in the near future, to begin the process of regulating electrical cords of certain types. One of the reasons for such regulations are that children have suffered mouth burn injuries which are associated with electrical extension cords. Toys with small parts may

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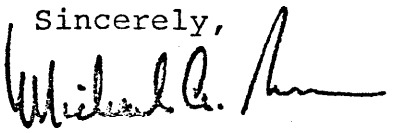
present hazards to children; these hazards have been studied by Commission staff, and regulations are also planned in this area. As you indicated in your letter, pets may suffer grievous injuries from the same products. Therefore, although unplanned, the safety of pets will also be enhanced as a result of these planned regulations. We are pleased that your letter brought this coincidental benefit to light.

The Commission appreciates your interest and concern.

Sincerely,



Michael A. Brown
General Counsel

Enclosure

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friends of animals, inc. *11 West 60th Street, New York, N.Y. 10023* *CIrcle 7-8120*

September 5, 1974

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FILE:
Lindy

Ms. Barbara Hackman Franklin
Commissioner
Consumer Product Safety Commission
Washington, D. C. 20207

Dear Ms. Franklin,

We read with much interest the article concerning the work of your agency. We hope very much that your Commission will extend its activities to cover the use of products in relation to animal safety. For example, the plastic top on six-paks of soda and beer, when discarded, becomes a noose for a bird or small animal that gets it around its neck. Small toys that present a hazard to youngsters who might choke on them also are deadly to the family pet for the same reason.

Cords on lamps and other electrical appliances which are not sufficiently insulated will electrocute child or pet who decides to cut their teeth on them.

These are but a few examples of danger to life - be it human or animal - resulting from misuse of products. We hope you will find the correlation valid and worthy of your attention. May we please hear from you.

Sincerely yours,

Joyce Lambert

Joyce Lambert
Assistant to the President

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