



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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COMMISSIONER NANCY A. NORD

**Statement on the Commission's Decision Concerning Opportunities to Reduce
Third Party Costs Consistent with Assuring the Compliance of Children's Products**

October 10, 2012

The Commission's unanimous vote today on our Congressionally-mandated review of opportunities to cut the burdensome costs of our testing and certification rule for children's products was a welcome first step that gives me hope that we will continue such efforts even absent further direction from Capitol Hill.

I supported this package because it is a good starting point of ideas for staff to further develop. I believe, however, we could have gone further. My understanding from staff is there are numerous other ideas, though not included in their proposal, that are worthy of review. In addition, there were suggestions from staff that were not included in today's Commission action. We owe it to all of our stakeholders to give each of those ideas the consideration it deserves and to continue looking for more. We should help our regulated community avoid hitting walls as they maneuver the path of compliance.

Having served as Acting Chairman when the Consumer Product Safety Improvement Act (CPSIA) became law, I am fully aware of our budgetary constraints while implementing this legislation. Our resource constraints affect the implementation of these ideas to reduce testing costs associated with CPSIA. Nonetheless, we must remember the companies we regulate have limited resources as well, and it is our obligation to require no more than is necessary to achieve our safety goals. To that end, we should incorporate an on-going effort to reduce testing costs into our operating plans. With careful planning we can achieve this even with our strained budget. Indeed, I believe that we have an affirmative obligation to do so. While we maintain our obligation for safety rulemaking, we need to maintain our obligation to correct issues we have created by our testing rulemaking, especially when those issues mean increased costs, lost jobs, and no real increase in safety.

The vote today is a good start on the path toward a more efficient, effective testing rule. I am very grateful for the hard work and dedication of our talented staff that made it possible, and I am confident that as they continue their efforts, we can have a testing rule that assures compliance in the least costly manner.