

“Beyond Counterfeiting: Product Safety Enforcement in a Global Marketplace”

Keynote Remarks of Peter A. Feldman at the 19th Annual International IP Crime Conference

October 28, 2026 – Bangkok, Thailand

As Prepared for Delivery

Good morning.

Thank you to UL Standards & Engagement and INTERPOL for inviting me to join you in Bangkok. I want to particularly thank David McKnight and Kim Harrington for the invitation, and our hosts here in Thailand for their hospitality.

It is a pleasure to be among so many law enforcement officers, investigators, prosecutors, customs officials, and industry representatives who are working to combat counterfeiting and illicit trade.

I lead the United States Consumer Product Safety Commission, or CPSC. Our agency is responsible for protecting American consumers from unreasonable risks of injury and death associated with thousands of different types of consumer products.

And while we may not be the first agency that comes to mind at a conference devoted to intellectual property crime, I believe the work we are doing has become increasingly relevant to the challenges confronting this audience.

Because today, counterfeiting is not simply a matter of intellectual property theft.

It is also a matter of public safety.

And increasingly, it is part of a much larger problem involving trade fraud, falsified compliance documents, deceptive business practices, and the deliberate evasion of laws designed to protect consumers.

I want to spend a few minutes discussing how these challenges are changing the way CPSC approaches enforcement—and why international cooperation is essential to meeting them.

A Changing Marketplace

Let me begin with the marketplace itself.

Over the past two decades, international commerce has undergone a remarkable transformation.

Consumers now have access to an extraordinary range of products from manufacturers and sellers around the world. E-commerce has lowered costs, expanded choice, and opened markets to businesses that previously had little ability to reach customers overseas.

These developments have produced enormous benefits.

But they have also fundamentally changed the nature of product safety enforcement.

Consider a fairly routine transaction.

An American consumer purchases an inexpensive electrical product from an online marketplace. The product is manufactured in one country, sold by a business registered in another, shipped through a third, and delivered directly to the consumer's home.

The consumer may have no idea who actually manufactured it, who imported it, or whether it was ever tested for compliance with applicable safety requirements.

And when that product catches fire, the challenges begin.

The seller may have no meaningful presence in the United States. The manufacturer may be difficult to identify. The business may operate through multiple storefronts or corporate entities.

And even when we identify a dangerous product, securing a recall can be extraordinarily difficult if the responsible firm refuses to cooperate.

This is not a hypothetical concern. It is an increasingly common enforcement problem. And one that CPSC faces daily.

The traditional tools of product safety regulation were developed for a marketplace in which manufacturers, importers, distributors, and retailers were generally identifiable and subject to meaningful regulatory oversight.

Today, that is not always the case.

And bad actors have learned to exploit the gaps.

A Renewed Emphasis on Enforcement

At CPSC, we have responded by returning the agency's attention to its core statutory mission.

Under President Trump's leadership, our focus has been on measurable safety outcomes—not simply the number of regulations we issue or the administrative processes we undertake.

We are concentrating our resources on identifying dangerous products, removing them from commerce, and holding responsible parties accountable.

The results have been significant.

In 2025, CPSC issued a record 542 recalls and product safety warnings.

Those actions involved approximately 26 million products.

We also issued nearly 90,000 takedown notices to third-party sellers and strengthened our efforts to identify and intercept dangerous imports.

These are meaningful enforcement results.

But our objective is not simply to increase the number of enforcement actions.

It is to make those actions more effective.

That means distinguishing between responsible businesses that make good-faith efforts to comply with the law and bad actors who deliberately evade their obligations.

It means directing our limited resources toward products that present the greatest risks.

And it means recognizing that civil and administrative remedies, while important, are not always sufficient to address deliberate misconduct.

Sometimes the appropriate response is criminal enforcement.

Criminal Accountability

CPSC is principally known as a civil regulatory agency.

We establish and enforce product safety requirements, investigate hazards, and work with companies to recall dangerous products.

But our statute also contains criminal provisions.

And where violations are knowing and willful, and the statutory requirements for prosecution are satisfied, criminal accountability is appropriate.

Recent cases illustrate why this authority matters.

In June 2025, two corporate executives were sentenced to federal prison for their roles in concealing information about dangerously defective dehumidifiers.

The products had been linked to more than 450 residential fires and over \$19 million in property damage. Rather than disclose the relevant safety information to CPSC as required by law, the executives participated in a scheme to withhold it.

Following their convictions, one executive received a 38-month prison sentence. The other received 40 months.

This was the first criminal prosecution of corporate executives for failing to report under the Consumer Product Safety Act.

And it established an important principle: individuals who knowingly violate product safety reporting requirements can face personal criminal consequences.

More recently, in April of this year, a federal court imposed an \$8 million criminal fine on Royal Sovereign International, a company that imported and sold defective portable air conditioners manufactured in China.

The company had imported and sold more than 33,000 defective units.

The air conditioners were allegedly linked to more than 40 fires and one death.

Royal Sovereign pleaded guilty to knowingly and willfully failing to report information about the product hazard to CPSC.

The company was also ordered to pay restitution to victims.

These cases are significant for several reasons.

First, they demonstrate that product safety reporting obligations are not optional.

Second, they show that criminal enforcement can reach both corporate entities and responsible individuals.

And third, they underscore that the consequences of deliberately concealing a product hazard can extend well beyond civil penalties or a product recall.

The obligation to report a dangerous product is a legal requirement. When a company knowingly disregards that obligation, the consequences can be severe.

The Intersection of Product Safety and Trade Fraud

There is another development I want to highlight because I believe it has particular relevance to this conference.

In August 2025, the United States Department of Justice and Department of Homeland Security established a joint Trade Fraud Task Force.

Its purpose is to investigate and pursue fraud involving imports, customs requirements, and international trade.

The initiative reflects a broader recognition that misconduct in global supply chains frequently crosses traditional enforcement boundaries.

A company that falsifies customs documentation may also be concealing the identity of a manufacturer.

An importer that misrepresents the origin or description of a shipment may also be evading product safety requirements.

And a business that submits fraudulent compliance certificates may be doing more than violating a technical regulation. It may be participating in a broader scheme to introduce prohibited or dangerous goods into the United States.

In July, the Department of Justice announced that the Trade Fraud Task Force had surpassed \$1 billion in combined recoveries, penalties, forfeitures, and publicly charged losses in less than a year.

CPSC is a proud partner in this initiative, which recognizes consumer product safety violations as an important component of the broader effort to combat trade fraud.

Indeed, the Royal Sovereign criminal case was included among the Task Force's highlighted enforcement results.

And in a resource guide published this summer, the United States has identified product safety certificate forgery as another form of trade fraud.

Consider what that means.

A falsified product safety certificate may be evidence of a regulatory violation.

But depending on the facts, it may also be evidence of customs fraud, smuggling, false statements, or other criminal conduct.

That distinction matters.

Because the tools available to a criminal investigator or federal prosecutor may be quite different from those available to a civil regulatory agency.

And the combination of those authorities can produce a much more effective enforcement response.

For CPSC, the lesson is straightforward.

We no longer view product safety violations in isolation when the evidence suggests broader fraudulent conduct.

We are prepared to follow the evidence, identify the responsible parties, and work with our federal law enforcement partners when the facts warrant criminal investigation.

That is an important part of our current enforcement strategy.

Counterfeit Safety Marks

This brings me to a subject of particular interest to the organizations represented here: counterfeit safety certification marks.

Much of the international discussion surrounding counterfeiting focuses on the infringement of trademarks and other intellectual property rights.

Those violations are serious.

But counterfeit safety marks present an additional and distinct concern.

They can create the false appearance that a product has been independently tested and found to meet established safety requirements.

Consider an electrical charger, a lithium-ion battery, or a household appliance.

A consumer may have little ability to evaluate the underlying electrical design, the quality of its components, or the risk that the product will overheat or catch fire.

Instead, consumers and businesses often rely on recognizable certification marks and other representations of compliance.

Those marks have value precisely because they are supposed to communicate something meaningful about the product.

But when a manufacturer simply copies a legitimate certification mark and places it on an untested or noncompliant product, that assurance becomes worthless.

The counterfeit mark does not make the product safe.

It makes the product appear safe.

And that is a particularly dangerous form of deception.

It can mislead consumers, retailers, online marketplaces, and even those responsible for enforcing product safety requirements.

It also creates an obvious competitive disadvantage for responsible firms that invest in legitimate testing, certification, and compliance.

In May of this year, CPSC launched a national crackdown on counterfeit safety labels and certification marks.

As part of that effort, we issued a formal Request for Information seeking input from manufacturers, testing laboratories, consumer organizations, and other stakeholders.

We asked about the prevalence of counterfeit certification marks, the safety risks associated with their use, the methods available to detect them, and the economic consequences for consumers and legitimate businesses.

We also sought information about potential enforcement actions under our existing statutory authorities.

This is not merely an academic exercise.

Under our statute, it is unlawful to sell, distribute, or import consumer products bearing registered safety certification marks that the seller knows, or should know, are being used without authorization from the mark's owner.

And we are examining how these practices may intersect with falsified testing records, deceptive import documentation, and other efforts to evade product safety requirements.

I believe there is considerable opportunity for cooperation here.

Standards organizations and certification bodies possess technical information that can help distinguish authentic marks from counterfeit ones.

Customs authorities can identify suspicious shipments and patterns of import activity.

Law enforcement agencies can investigate the individuals and organizations responsible for producing and distributing counterfeit goods.

And product safety regulators can assess the hazards those goods present to consumers.

Each brings a different capability.

The challenge is connecting those capabilities in a way that produces meaningful enforcement results.

Modernizing Enforcement at the Border

Of course, criminal prosecution is only one component of an effective enforcement strategy.

Our first objective should be to prevent dangerous products from reaching consumers in the first place.

And that requires better information at the border.

In July, CPSC implemented a significant modernization of its import surveillance program through a new electronic filing requirement.

Under this system, importers of covered consumer products must submit compliance certificate information electronically before those products enter U.S. commerce.

This provides our investigators with more timely information about regulated imports and helps us identify shipments that may warrant additional scrutiny.

It also allows us to target our resources more effectively.

A responsible importer that maintains accurate records and complies with applicable requirements should not face unnecessary delays at import

Conversely, an importer that provides inconsistent, incomplete, or potentially fraudulent information should expect closer scrutiny, delays, denied entry, or seizure.

Electronic filing does not eliminate the need for inspections or investigations.

And a certificate is not, by itself, proof that a product is safe.

But better data allows us to make better enforcement decisions.

We are also exploring additional ways to use analytics and modern technology to identify patterns of noncompliance and direct investigative resources toward the greatest risks.

These efforts reflect a broader change in our approach.

We want to intervene earlier, investigate more effectively, and avoid relying exclusively on recalls after dangerous products have already entered American homes.

Using the Full Range of Our Authorities

We are also reconsidering whether the Commission has made sufficient use of the enforcement authorities Congress has already provided.

For example, CPSC recently worked with the Department of Justice to initiate an action involving dangerous immersion water heaters under Section 12 of the Consumer Product Safety Act.

Section 12 authorizes the Commission to seek a federal court determination that a consumer product presents an imminent hazard.

It is an authority that had gone largely unused for decades.

But it offers important advantages in cases involving serious hazards and uncooperative firms.

Rather than relying exclusively on a lengthy administrative process, the Commission can seek judicial intervention to address products that present an imminent and unreasonable risk of death, serious illness, or severe personal injury.

This is particularly relevant when the responsible seller has little meaningful presence in the United States or refuses to cooperate with a voluntary recall.

Section 12 is not a criminal enforcement authority.

But it illustrates the broader principle guiding our work.

We intend to make effective use of the tools Congress has provided, rather than assume that the methods traditionally used by the agency are necessarily sufficient for the challenges we face today.

That same principle applies to our relationships with the Department of Justice, Homeland Security Investigations, U.S. Customs and Border Protection, and other enforcement partners.

When the facts warrant a civil regulatory response, we will pursue it.

When they warrant judicial intervention, we will seek it.

And when the evidence establishes grounds for criminal investigation, we won't hesitate to work with the appropriate authorities.

International Cooperation

Let me conclude with a few observations about international cooperation.

The theme of this year's conference is "Bridging Borders "

That theme captures an essential reality of modern product safety enforcement.

The products we regulate move across borders.

The businesses responsible for them operate across jurisdictions.

And the evidence necessary to investigate misconduct may be distributed among supply chain actors around the world.

No single agency has access to all of that information.

And no single country can address these challenges alone.

That is why organizations like INTERPOL and UL Standards & Engagement have an important role to play.

INTERPOL brings together law enforcement authorities with the ability to identify and investigate criminal activity across jurisdictions.

UL and other standards organizations bring technical expertise and knowledge of the certification systems on which consumers and legitimate businesses depend.

Product safety regulators bring specialized knowledge of product hazards, compliance requirements, and the evidence needed to establish violations.

Working together, these organizations can help identify dangerous products earlier, expose fraudulent practices, and improve accountability throughout the supply chain.

At CPSC, our objective is not to restrict legitimate international commerce.

Quite the opposite.

We want a marketplace in which responsible businesses can compete fairly, consumers can benefit from innovation and affordable products, and companies that comply with the law are not disadvantaged by competitors who evade it.

But that requires meaningful enforcement.

A marketplace that rewards deception, tolerates fraud, or allows dangerous products to be sold without accountability is not a well-functioning marketplace.

It is a marketplace in which responsible businesses and consumers bear the costs of unlawful conduct.

We do not accept that result.

The challenges we face are significant. But so are the authorities, expertise, and investigative capabilities represented in this room.

Our task is to use them effectively.

To identify the fraud.

To follow the evidence.

To hold responsible parties accountable.

And ultimately, to prevent dangerous products from reaching the people we are charged with protecting.

Thank you.