



U.S. CONSUMER PRODUCT SAFETY COMMISSION

WASHINGTON, D.C. 20207

Record of Commission Action
Commissioners Voting
September 1978

1111 18th Street, N.W.
Washington, D. C.

Voting: Chairman King
Commissioner Franklin
Commissioner Pittle
Commissioner Sloan

ITEM

Letter to Esther Peterson regarding proposed Hazardous
Substances Export Policy. (COPY ATTACHED)

DECISION

The Commission voted to approve the letter. Letter issued
on September 20, 1978.

VOTE

CONCURRING: Chairman King

Lucas B. King

Commissioner Pittle

R. David Pittle

Commissioner Sloan

Edith Barksdale Sloan

For the Commission:

VOTING TO DISAPPROVE THE LETTER:

Sadye E. Dunn
Secretary

Commissioner Franklin

Barbara H. Franklin

SEP 20 1978

Honorable Esther Peterson
Special Assistant to the President
for Consumer Affairs
The White House
Washington, D.C. 20500

Dear Esther:

The Commission has reviewed the third draft of the Hazardous Substances Export Policy. Before offering our comments, let me thank you for taking the lead on the complex and controversial subject of hazardous product export. This is an important topic that deserves greater public attention and analysis than it has received to date. We applaud your efforts to develop a uniform export policy framework for use by federal agencies.

We generally support the proposed policy. The recommended principles and procedures would be a solid contribution toward dealing with the problem of hazardous exports.

As we have indicated in previous communications with your office, we would prefer that the policy be stronger in three respects:

1) The report seems to imply that export restrictions should be employed only in rare instances. (See, for example, page 20.) The Commission continues to believe that it is both appropriate and necessary for the United States to restrict the export of certain dangerous products. We believe it is impossible to predict the frequency of such cases.

2) The Commission believes that agencies should have the authority to require exporters to secure the importing country's permission as a condition of exporting certain hazardous products. This view is supported by the decision of the UNEP Governing Council quoted on page eight of the report.

Page 2 - Honorable Esther Peterson

3) The Commission questions whether the existence of alternate foreign sources of the hazardous product is an appropriate factor for federal agencies to consider in making hazardous export decisions.

We hope these comments prove useful in developing a final policy and look forward to helping to implement it.

Sincerely,

151

Susan B. King
Chairman

cc: Chairman
Commissioners ✓
EX
OGC
OCR
OS
OSP

cc: Alpha
Chron

SBKing; jb 9-19-78