

Handmade Toy Alliance Platform

The Handmade Toy Alliance (HTA) represents a broad spectrum of small businesses involved in production, retailing and importing of children's products. Our membership experiences the burden of the unintended consequences of the Consumer Product Safety Improvement Act (CPSIA) in different ways. Our platform outlines these issues for each business category along with the solutions and remedies desired by the HTA.



Business Type	% Members	Issues Caused by the CPSIA	Solutions Needed
Micro-business children's product crafter - retailer¹ <i>(single owner or small group, no employees, making toys or children's products in very small batches)</i>	48 %	<p>The CPSIA makes no provision for micro-businesses to be able to operate – they are treated equivalently to mass market manufacturers</p> <ul style="list-style-type: none"> • Cost of 3rd party testing for lead and ASTM F963 not economically feasible • Tracking, labeling and recordkeeping requirements burdensome • The law and its requirements are too complex to interpret, apply and attempt compliance 	<ul style="list-style-type: none"> • Provide an exemption from all 3rd party testing, certification and from labeling requirements

¹ For example, small family business producing toys for retail at craft shows or online, sole proprietor producing unique children's products for retail locally, a retired senior who produces 20 wooden toys annually, a homemaker producing artistic children's products and retailing through etsy.com.



Business Type	% Members	Issues Caused by the CPSIA	Solutions Needed
<p>Small-business children's product manufacturer</p> <p><i>(less than 10 employees making toys or children's products in small batches or as one-of-a-kind)</i></p>	<p>15 %</p>	<p>The CPSIA makes no provision for these entities to continue to be viable businesses after absorbing the costs of the CPSIA – they are treated equivalently to mass market manufacturers</p> <ul style="list-style-type: none"> • 3rd party testing and certification for lead content is too costly in small batches • 3rd party testing and certification for ASTM F963 is too costly in small batches • Tracking, labeling and recordkeeping requirements burdensome 	<ul style="list-style-type: none"> • Allow compliance with lead content standards with less expensive alternatives like XRF scanning and component part certification² • Make ASTM F963 testing voluntary • Tracking labels become voluntary except for durable nursery items. Manufacturers implementing tracking labels benefit from a lesser burden in the event of a recall.

² When and if certified component parts are readily available.



Business Type	% Members	Issues Caused by the CPSIA	Solutions Needed
<p>Specialty toy retailers <i>(less than 10 employees retailing specialty children's products)</i></p>	<p>19 %</p>	<p>The CPSIA makes no provision for specialty retailers to have access to a myriad of safe international products while simultaneously depressing the market for domestically produced specialty items</p> <ul style="list-style-type: none"> ● Loss of specialty products from Europe tilts the children's products market in favor of mass retailers selling mass produced items ● Loss of specialty products from the USA removes opportunity for differentiation with mass retailers ● Limits consumer choice unnecessarily ● The CPSIA creates a regulatory trade barrier to international small batch manufacturers 	<ul style="list-style-type: none"> ● Recognize European Union safety standard EN-71 as an alternate for CPSIA ● Direct CPSC to monitor international standards in children's products and recognize acceptable standards as alternates for CPSIA ● See two previous categories for restoring access to domestically produced specialty products



Business Type	% Members	Issues Caused by the CPSIA	Solutions Needed
<p>Specialty toy importers <i>(less than 10 employees importing specialty children's products)</i></p>	<p>2%</p>	<p>The CPSIA makes no provision for small scale importers / distributors of foreign children's products. They are treated equivalently to mass market manufacturers.</p> <ul style="list-style-type: none"> • 3rd party testing and certification for lead content is costly in small batches • 3rd party testing and certification for ASTM F963 is costly in small batches • Tracking, labeling and recordkeeping requirements burdensome 	<ul style="list-style-type: none"> • Allow compliance with lead content standards with less costly alternatives like XRF scanning • Make ASTM F963 testing voluntary • Tracking labels become voluntary except for durable nursery items. Manufacturers implementing tracking labels benefit from a lesser burden in the event of a recall. • Recognize European Union safety standard EN-71 as an alternate for CPSIA

For our membership and all Americans, the CPSIA regulations usher in a sea-change in the culture of children's products in the USA. Unless Congress acts, the accessibility of unique, small batch toys and children's products will significantly diminish. The children's products heritage of the next generation will be mass produced with little uniqueness. Save our members and save the culture.