

May 3, 2016

Chairman Elliot Kaye
Consumer Product Safety Commission
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814

Dear Chairman Kaye,

The undersigned trade associations commend the U.S. Consumer Product Safety Commission's (CPSC) recent change in enforcement policy on General Certificates of Conformity (GCCs) for exempt adult apparel.

Collectively, we represent importers, manufacturers, retailers, brand owners and other companies that manufacture and sell apparel regulated by the CPSC. We have established longstanding and active relationships with the CPSC and other product safety stakeholders. Through these alliances, we have educated the industry on the development and the implementation of new product safety standards, while at the same time informing the CPSC of the many concerns of the industry regarding product safety initiatives and activities.

Again, we commend the Commission's decision to adopt unanimously Commissioner Mohorovic's proposal to eliminate General Conformity Certificates (GCC) for adult apparel already exempt from flammability testing. Articulating such a policy, eliminates a costly and unnecessary paperwork burden on clothing manufacturers and importers, without any adverse impact to consumer product safety.

We appreciate your thorough review of the issue and support the CPSC's risk-based approach to eliminate unnecessary GCCs on products that are already deemed compliant by the CPSC. The Commission's decision sets an important precedent and encourages further collaboration between the Commission and stakeholders to eliminate burdensome requirements that do not advance product safety. We look forward to working with the Commission to create a stable, predictable, risk-based regulatory environment that can be adhered to by all stakeholders.

Sincerely,

American Apparel & Footwear Association
Halloween Industry Association
INDA, Association of the Nonwoven Fabrics Industry
Juvenile Products Manufacturers Association
National Council of Textile Organizations
National Retail Federation
Retail Industry Leaders Association
United States Fashion Industry Association