



June 1, 2016

Todd A. Stevenson
Office of the Secretary
Consumer Product Safety Commission
4330 East West Highway
Room 820
Bethesda, MD 20814

RE: AAFA Recommendations for the Consumer Product Safety Commission's (CPSC) Budget Priorities for Fiscal Years 2017 and 2018

Dear Mr. Stevenson,

On behalf of the American Apparel & Footwear Association (AAFA), thank you for the opportunity to comment on the Commission's budget priorities for fiscal years 2017 and 2018.

AAFA is the national trade association representing the apparel and footwear industry including its suppliers, manufacturers, retailers, and service providers. Our industry accounts for more than four million U.S. employees and more than \$361 billion in retail sales each year.

Product safety is of the utmost importance for AAFA member companies. To support our members, many of whom are engaged in the production and sale of children's clothing and footwear, AAFA has taken the lead in educating the industry on the development, interpretation, and implementation of product safety regulations.

AAFA offers the following recommendation on the priorities the Commission should consider emphasizing and dedicating resources toward in the fiscal year 2017 Operating Plan and the fiscal year 2018 Congressional Budget Request:

International Testing Harmonization & Mutual Recognition of Standards

AAFA firmly believes in the need for international testing harmonization as well as mutual recognition of testing to support product compliance and certification. When testing for compliance with a particular regulation, duplicative testing is counterproductive as it does not provide any greater assurance of compliance. Presently, the Commission has the opportunity through the Transatlantic Trade and Investment Partnership (TTIP) negotiations between the European Union and the United States to promote global harmonization and mutual recognition of standards.

European negotiators have signaled their interest in pursuing regulatory harmonization initiatives with respect to textiles and apparel in the forthcoming TTIP trade agreement. Such an initiative could include provisions related to labeling, safety, market driven standards, and bilateral cooperation. AAFA has long recommended including regulatory harmonization for both footwear and apparel in the TTIP, most recently at a stakeholders meeting during the 13th round of talks in New York in April. We strongly support the intention to harmonize technical regulations and approaches to guarantee product safety and consumer protection. Ideally, the

U.S. and the EU should work to remove unnecessary and duplicative testing by expanding of acceptance of conformity assessment bodies and moving towards a single international standard test method.

Lastly, we note that an amendment to the CPSC's Fiscal Year 2014 Operating Plan which passed 3-1, calls for guidance to be issued to the regulated community to ease unnecessary, burdensome, duplicative testing. "The Commission also directs staff to draft a statement of policy that sets forth a protocol for the submission of requests for determinations of equivalency between tests administered in CPSC's regulations and comparable tests administered in international standards. Such protocol, at a minimum shall require requests for equivalency determinations to establish that the testing requirements of any alternative tests administered in an international standard will assure compliance with all applicable children's product safety rules, regulations, standards, or bans and are as stringent, or more so (including third party testing where required), as the current CPSC testing requirements..."

We urge the Commission to revisit the aforementioned amendment and recommend that the Commission dedicate resources toward international harmonization of product safety standards in the fiscal year 2017-2018 Operating Plan.

CONCLUSION

Thank you for the opportunity to provide comments and suggestions. AAFA looks forward to working with the Commission and furthering our collaborative relationship of ensuring product safety. Please contact Danielle Iverson of my staff at 202.853.9350 or by email at diverson@aafaglobal.org if you have questions or would like additional information.

Sincerely



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