



March 9, 2016

Office of the Secretary
Consumer Product Safety Commission
Room 502
4330 East-West Highway
Bethesda, Maryland 20814

Comments of Kids In Danger (KID) and Consumer Federation of America (CFA) to the U.S Consumer Product Safety Commission on “Draft Strategic Plan 2016 - 2020”

Thank you for the opportunity to submit comments on the U.S. Consumer Product Safety Commission’s (CPSC) draft strategic plan. Our organizations support the vision of the plan: a nation free from unreasonable risks of injury and death from consumer products. The focus on injury prevention, recall effectiveness, research and workforce cultivation are key to meeting the strategic goals outlined in the proposed plan.

Strategic Goal #1: cultivate the most effective consumer product safety workforce

It is understood that a workforce prepared and energized to meet the agency’s challenges is imperative. We support the CPSC’s prioritization of this in the strategic plan. One of the keys to recruiting, developing and retaining a quality workforce is to assure a workplace where scientific integrity, innovation and collaboration are valued.

Strategic Goal #2: prevent hazardous products from reaching consumers

In addition to the strategic objectives laid out in the plan, a continued focus on implementation of the 2008 landmark Consumer Product Safety Improvement Act (CPSIA) is crucial to meeting both this goal and Strategic Goal #3. Through the implementation of the Consumer Product Safety Improvement Act (CPSIA) and Danny’s Law, the CPSC has put much time and energy into developing mandatory standards for durable infant and toddler products. However, there is still more to do. Currently the CPSC has a mandatory standard for 14 of the 21 durable infant and toddler products included in Danny’s Law. We urge CPSC to continue to prioritize this work, giving staff the time and resources they need to develop strong standards that will reduce injuries and deaths from nursery products.

We support the plan’s focus on research and risk assessment of products. With all the talk of Big Data and new research using data mining from everything from product reviews to social media, the CPSC should be able to use new techniques to get information to help with this goal. We urge the CPSC to further prioritize injury prevention research.

Strategic Goal #3: Respond quickly to address hazardous consumer products in the marketplace and with consumers

Again, relying on the work of the CPSIA, we urge the CPSC to continue to rely on and strengthen SaferProducts.gov. The CPSIA charged the CPSC to create a product database for consumers and

manufacturers. SaferProducts.gov is the result of this mandate. Thousands of consumers have filed reports with the database and thousands more use it to review product reports and help influence buying decisions and provide information for research. It is an invaluable resource for safety. But even using other data from CPSC – incident reports and NEISS data, we know there are thousands – if not millions - of product related injuries that go unreported to SaferProducts.gov. CPSC should prioritize using low-cost efforts to increase the database’s visibility and use.

Encouraging others to use data for research both from SaferProducts.gov and NEISS data as well as other data such as incident reports that are not in either of these public data sources is critical. Giving CPSC the tools and resources to go beyond the numbers and look at design of products that might lead to injuries or broad assumptions about safe use is also critical.

Strategic objective 3.3 describes improving consumer responses to consumer product recalls. Reports both internally from the CPSC and from KID shows the number of products corrected, especially when it comes to children’s products, is abysmally low. Too much of the burden from recalls falls on consumers – listening to the news, filling out forms, waiting for and installing repairs, and even learning about the recall in the first place. However, consumers are not the ones responsible for recalled products. This imbalance of burden and responsibility should be corrected. Innovation and use of new technology should be promoted and recalling firms should be held accountable. Benchmark requirements for notification measures such as social media warnings and outcome measures such as capture rate should be developed and enforced. Collaboration for a strong recall response should be encouraged throughout the stream of commerce including retailers. Recalling firms should use the same creativity and tools to recall products as they do to market them.

Strategic Goal #4: Communicate useful information quickly and effectively to better inform decisions

The CPSC encourages the use of social media for recalling firms. Now is the time for the CPSC to be present on every platform where they can effectively reach consumers. From a recall board on Pinterest, to a Facebook presence, to pictures of recall fixes on Instagram, there is much room for improvement in this area that is leading communication strategies in many industries.

Conclusion

Again, thank you for the opportunity to provide comments. We look forward to working with the CPSC in implementing this ambitious plan for safety.

Nancy A. Cowles
Executive Director
Kids In Danger

Rachel Weintraub
Legislative Director and General Counsel
Consumer Federation of America