



Ruth Ann Norton  
Executive Director

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

**Re: Children's Jewelry Containing Lead ANPR  
Federal Register Vol. 72, No.5, January 9, 2007**

March 7, 2007

Dear Secretary:

On behalf of the Coalition to End Childhood Lead Poisoning, I would like to applaud the CPSC on its examination of lead in children's jewelry and urge the Commission to pursue next steps to strengthen federal powers, limit market availability, and protect families from leaded children's jewelry, as well as other children's items containing lead.

The Coalition to End Childhood Lead Poisoning is a 501c3 nonprofit organization headquartered in Baltimore but working throughout the United States. The Coalition focuses its energies and resources on primary prevention of lead poisoning through policy, direct services, public awareness/education, and lead hazard reduction. As such, we do not collect or track the type of data requested in section G: Solicitation of Information and Comments. However, as an organization founded on family advocacy and grassroots involvement, we would like to share some suggestions for moving forward with rulemaking:

- The Coalition requests that the CPSC bear in mind the normal developmental hand-to-mouth activity of young children; articles not intended for ingestion may be chewed and/or accidentally swallowed, thereby becoming an exposure risk.
- The Coalition encourages the CPSC to pursue the *Mandatory Rule* regulatory approach, in addition to other methods such as labeling requirements. Due to lead's permanent harmful effects on small children, even in small quantities, banning leaded objects is the surest and safest way to prevent exposure.
- The current Federal Hazardous Substances Act pertaining to children's jewelry is insufficient to protect children. Due to the volume and diversity of jewelry articles, it is not a strong enough regulation to prevent hazardous items from reaching store shelves, or worse, children's mouths.



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We encourage the CPSC to take immediate, swift and forceful actions to effectively ban the sale or distribution of lead-containing items with foreseeable use or ingestion by children. Thank you for the opportunity to submit our comments. We look forward to seeing additional action on this issue from the CPSC. Meanwhile, please do not hesitate to contact us at any time if we can be of further assistance.

Sincerely,



Ruth Ann Norton  
Executive Director