

Mr. Chairman and Members of the Subcommittee:

Thank you for giving me the opportunity to provide testimony on H.R. 4040, The Consumer Product Safety Modernization Act of 2007. On behalf of Hasbro, I would like to express our appreciation to the Members of this Committee and your staffs for your bipartisan efforts to address consumer product safety issues.

Hasbro is a worldwide leader in the design and manufacture of toys and games that are enjoyed by children and families both here in the U.S. and abroad. Our widely recognized brands include Playskool, Tonka, Milton Bradley, Nerf and Parker Brothers.

As Director of Product Safety and Regulatory Affairs at Hasbro, and as a parent of two young girls, no issue is more important to me than the safety of our toys and of the children who enjoy them. Our product safety and quality assurance systems are based on a comprehensive and stringent review process at every stage of product development. We require that all of our products meet -- or exceed -- all applicable national and international standards as well as our own often more stringent internal standards. And, to ensure compliance with these standards, Hasbro's testing and quality control procedures have always included independent, third-party testing of our products.

While Hasbro has not been impacted by the recent lead paint recalls, we have taken additional steps to confirm that our procedures are being adhered to and that we are doing everything possible to make the safest toys for our children. We have checked

100% of our vendor base and carried out over 1000 additional confirmatory product tests, over and above all the tests that are routinely carried out by Hasbro, our retailers and third parties in accordance with a testing program that has been in place for years. We have also stepped up inspections of all factories manufacturing Hasbro products, both here in the U.S. as well as overseas.

While nothing is more important to Hasbro than the safety of our toys, we recognize that no system is perfect and that when it comes to a child's safety, we must continuously be vigilant. We are constantly looking to improve and learn from every situation where there is an issue related to a toy's safety. And we support Congressional efforts to equip regulators with the resources and tools to ensure that our industry as a whole produces the safest possible products for our children.

Mr. Chairman, H.R. 4040 significantly tightens the regulation of toy safety. As you know, it sets a high bar, but by working closely with industry and others, the committee has crafted a framework that is workable while enhancing toy safety. The heart of that framework is a new lead content standard and a mandatory third party testing regime.

This legislation creates a new and significantly lower limit on the total amount of lead that can be in any accessible part of the toy. This limit goes down over time. As the committee knows, Hasbro supports reducing the current total lead content standard, although not to the levels currently envisioned in the legislation. The legislation also

breaks new ground by proposing, for the first time in federal law, a limit on “soluble” lead. We believe that, when combined with an appropriate total lead standard, the soluble limit in the bill will further enhance protection for children by limiting the amount of lead that a child can be exposed to. Therefore, we would urge the Committee to consider combining a workable total lead standard with a 90 ppm soluble limit.

Hasbro supports mandatory third party testing. Working with the Toy Industry Association, we have been seeking to develop a rigorous third party testing system. This system will include vendor audits, additional process controls, and product testing. Products will be reviewed for conformity with both mandatory as well as voluntary standards. In our view, the proposed legislation strikes the right balance by carefully defining independence and requiring that the “testing entity” be “accredited in accordance with an accreditation process established or recognized by the Commission.”

The bill also includes severe civil penalties for failure to report on a timely basis a potential product safety hazard to the CPSC. In light of these significant penalties, we think the law would benefit from more precise definitions covering the responsibility of manufacturers to provide information to the CPSC. We also think that a standard of intent should be included in the bill. We look forward to working with the Committee on these issues.

Mr. Chairman, we have had the committee draft for a little over four days. We are still completing a review of some of its provisions. We do have questions on several other provisions that we hope to explore further with you and the staff.

Finally, let me again say that we at Hasbro take the safety of children very seriously. We look forward to working with you on these and other issues as the legislative process unfolds.

Thank you again for the opportunity to appear today.