



Centers for Disease Control  
and Prevention (CDC)  
Atlanta GA 30333

MAR 3 2006

TO: The Secretary  
Through: ES \_\_\_\_\_

FROM: Director  
Centers for Disease Control and Prevention

SUBJECT: Recommendations for Interagency Working Group on Import Safety

Attached are the Department of Health and Human Services' Advisory Committee on Childhood Lead Poisoning Prevention's recommendations to reduce the health hazards posed by the presence of elevated levels of lead in children's jewelry, clothing ornaments, and paint applied to children's toys.

If further information is desired, please feel free to contact me.

  
Julie Louise Gerberding, M.D., M.P.H.

Attachment

November 24, 2007

Julie Gerberding MD, MPH  
Director, Centers for Disease Control and Prevention  
1600 Clifton Rd. NE  
Atlanta, GA 30333

Re: Interagency Working Group on Import Safety

Dear Dr. Gerberding:

The Centers for Disease Control and Prevention (CDC) Advisory Committee on Childhood Lead Poisoning Prevention (the Committee) has been constituted to advise the Secretary of Health and Human Services and the CDC Director on advancements in knowledge regarding childhood lead poisoning, and to recommend improvements in national childhood lead poisoning prevention efforts. Secretary Leavitt chairs the Interagency Working Group on Import Safety (Working Group) which has been charged with coordinating the federal response to imported products contaminated or adulterated with dangerous chemicals.

Taking note of the recent increase in attention to the presence of elevated levels of lead in children's jewelry, clothing ornaments, and paint applied to children's toys, the Committee, with the exception of one voting committee member dissent, respectfully offers the following recommendations for the Working Group to reduce the health hazards posed by such products:

1. Implement an immediate ban on the use of lead in products commonly used or worn by children that are manufactured, sold, or held for sale in the U.S. The current regulatory limitation in the United States applies to lead in residential paint, and paint applied to toys and other articles intended for use by children.

However, children's jewelry made from lead alloys, vinyl products and ceramic glazed objects containing lead are not explicitly prohibited.

2. Promotion of a worldwide ban on the use of lead in products commonly used by children, including children's jewelry, clothing ornaments, and paint applied to children's toys. Recent experience suggests that virtually all of the children's jewelry, ornaments and toys containing elevated levels of lead that have been identified domestically were manufactured abroad and imported into the United States. Although increased inspection of US imports of such products is warranted, public health will be best served by a worldwide program of primary prevention built on formal international agreements to eliminate the use of lead in these products. Whether through the World Trade Organization, the United Nations Environment Program, or other appropriate venues, the Committee recommends that the United States pursue earnest discussions with its trading partners to promote such a policy. In addition to protecting American children, such a step will be consistent with CDC's goal of promoting health and safety worldwide both for the workers who manufacture these products and children who may be exposed to lead through the production or use of the products.

3. Support for international public health conferences and other educational activities to increase lead hazard awareness among key U.S. trading partners. Our nation's progress in reducing childhood lead poisoning has been based in part on multi-faceted public health research, and on the effectiveness of lead poisoning prevention programs in disseminating such research advances and implementing preventive strategies. The Committee believes that progress in the worldwide elimination of lead hazards to children can be enhanced by scholarly exchanges with the public health communities of our major trading partners in the developing world. United States financial support for an educational exchange between public health experts in the United States, China, Mexico, and other

important trading partners would constitute an important step in this direction. A highly publicized international conference on childhood lead poisoning prevention, in Beijing in 2008, attended by representatives of the public health and consumer product communities, could be an important component of such efforts. In addition to its educational value, the conference could build consensus for the worldwide ban proposed above.

4. Prevention of the export from the United States of lead containing products deemed unsafe for domestic use. Consistent with the need to eliminate lead hazards in children's jewelry, ornaments and toys worldwide, the United States must take decisive steps to prevent the export to other countries of any lead containing products deemed unsafe for use by American children. The current Consumer Product Safety Commission policy of approving some of these exports subject to informing recipient countries of their domestic recall status is inadequate, and is contrary to the goal of worldwide primary prevention. The Committee believes that absolute prohibition of such exports combined with destruction of existing products would constitute the only policy congruent with our national goal of global health diplomacy.

We have drafted a letter to Secretary Leavitt that outlines these recommendations for your review.

Respectfully submitted,



George Rhoads MD, MPH  
Dean, University of Medicine and Dentistry of New Jersey and  
Chair, Advisory Committee on Childhood Lead Poisoning Prevention



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Associate Clinical Professor, Division of Clinical Pharmacology & Toxicology  
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Chair, ACCLPP Working Group on Lead in Toys



Mary Jean Brown ScD, RN  
Chief, Lead Poisoning Prevention Branch and  
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