

**REMARKS made by  
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Injury prevention science tells us that an ounce of prevention is worth a pound of cure. The Consumer Product Safety Act assigned the CPSC four main goals:

- (1) to protect the public against unreasonable risks of injury associated with consumer products;
- (2) to assist consumers in evaluating the comparative safety of consumer products;
- (3) to develop uniform safety standards for consumer products and to minimize conflicting State and local regulations; and
- (4) to promote research and investigation into the causes and prevention of product-related deaths, illnesses, and injuries.

This complex mission remains just as valid and important five decades later, especially now when so many more products are being sold. Global manufacturing volumes and the complexity of supply chains dwarf the markets of the past. More than ever, we need a strong safety agency. In practice, CPSC has just a couple basic strategies: education and law enforcement. Education is proactive and law enforcement is reactive. Together, these two strategies have been successful at diminishing fatalities and injuries in many different product categories, from chain saws to baby bouncers.

CPSC was already dramatically cut during the Reagan administration such that now all CPSC employees fill multiple roles and serve on multiple teams to get the job done. I fear that deeper cuts will result in rising injury rates and less investigation into the causes and prevention of deaths, illnesses, and injuries.

Furthermore, the independence and bipartisan design of the Commission provide robust, open public debate that leads to stable, predictable policy-making the nation wants for marketing safe, high-quality products without unfair competition from fly-by-night foreign manufacturers who are ignorant of (or ignoring) U.S. standards.

Safety policy will always be an ongoing public discussion about consumer rights, business freedoms, government authority, and economic burdens. Such highly technical, multifaceted matters deserve the leadership of a bipartisan commission of experts and should not be left to a single person who might be replaced every four years. I will also be happy to address any questions about data gathering, research, and injury prevention strategies, too.

As I mentioned earlier, educational activities play an integral part in CPSC's injury prevention strategies. Law enforcement activities, though vital, are labor intensive and expensive compared to educational efforts. Law enforcement activities also occur AFTER hazardous products have been manufactured and shipped to the country. Law enforcement agencies need to use every tax dollar appropriated for them with great care. To emphasize law enforcement activities at the expense of educational activities does not make much sense. Educational activities stop hazards from being produced in the first place, thereby saving staff time and resources needed to hunt down hazards at the ports and in the marketplace which is a much more complicated and labor-intensive activity than teaching the manufacturers how to make safe, compliant products up front. If a manufacturer does not know U.S. standards and regulations well enough to make safe, compliant products, they need help learning about the regulations and standards. If they come to the agency with questions about the regulations, the agency should provide answers to help them make safer products. If the agency does not help them, the manufacturers are on their own and may make mistakes that cost the agency time to hunt down and could cause injuries before the agency finds them. Not educating manufacturers about safety regulations and quality control best practices leaves the door open to manufacturing errors that can lead to hazardous products finding their way into our homes.

Sadly, this year, the agency inexplicably DISBANDED the two main educational offices tasked with educating manufacturers about our country's regulations and laws: the Office of International Programs and the Small Business Ombudsman. Staff in those offices retired early or were reassigned to other duties. Now, all the planned activities of those offices that were previously helping to prevent the manufacture of hazardous products are not getting done. Their regularly scheduled performance goals are not being met. The Small Business Ombudsman had been answering about 3,000 questions per year. Only a tiny fraction of those questions are getting answers now.

Ironically, the Office of International Programs was created by a REPUBLICAN chairman, Hal Stratton, in 2004. The first director of that office was Joseph Mohorovic (R), later appointed as a Commissioner. CPSC's former Acting Chairman Nancy Nord (R) lauded the efforts of that office in 2016, saying:

Immediately following the passage of new safety legislation in the United States, representatives of the CPSC, including the acting chairman of the agency, and representatives of the European Commission conducted a series of safety seminars in China in September 2008. **The purpose of the seminars was to educate Chinese product manufacturers about the EU and U.S. safety requirements for clothing, toys and electrical products, including the new statutory requirements.** The seminars had the visible support of Chinese officials from AQSIQ. This joint outreach effort by representatives of the two largest markets for Chinese products speaking with one voice about the importance of

safety, with the Chinese government looking on in support, was **designed to make a loud statement about the serious need to promote respect for, and compliance with, safety requirements.** (*emphasis added*) - page 81 in <https://regulatorystudies.columbian.gwu.edu/sites/g/files/zaxdzs4751/files/downloads/Reports/GW%20Reg%20Studies%20-%20European%20Union%20-%20Regulatory%20Cooperation.pdf> (accessed 7/21/2025)

We have no way of knowing how many recalls were avoided by the CPSC's efforts to educate foreign manufacturers over the last twenty years. We cannot quantify recalls that never happened, or people who didn't die, or families that didn't have to pay for hospital bills after a consumer product related injury or illness. Because of the educational activities of the Office of International Programs and the Small Business Ombudsman, people who would have otherwise been hurt or killed by a hazardous product, simply go about their lives unscathed and uncountable. We have no way of knowing who they are or how to quantify all the recalls that never needed to happen because of educational outreach.

Sadly, recent increases in recall volumes at the CPSC might offer some evidence of the utility of educational outreach. The disbanding of the two educational divisions of the CPSC has been correlated with an increase in recalls. While certainly vital, useful, and needed, every recall also represents a small failure of the nation's safety system because every recall represents a hazardous product that was **ALREADY SOLD** to someone and, in many cases, has **ALREADY HURT** an American citizen. **All recalls are CLOSE CALLS for the owners of the recalled product.** When a product you own has been recalled, you've likely been using it already. You realize that you and your family have been in harm's way. That is too close for comfort for most people.

The better strategy is to educate manufacturers before they make a hazardous product rather than relying on an understaffed and underfunded law enforcement agency to hopefully find the products after they've been shipped to our shores. Why play whack a mole at the ports, or, even worse, on store shelves across the nation? This discussion also says nothing of the cost of every recall for the agency in staff time and cost to the nation incurred by injuries and applying for recall remedies. The effort, time, and resources needed to mount a successful recall strategy in the marketplace is much larger than a simple, manufacturer-targeted educational strategy. If efficiency and effectiveness are paramount, why disband the cheaper and more effective educational offices at the CPSC?

Lastly, why would the agency tout recall rates as a measure of success? Every recall is a minor success in law enforcement and, simultaneously, a major failure of the national injury prevention strategy. Should the agency let people get hurt before trying to prevent injuries? Should questions from manufacturers who are trying to make safe products go unanswered? Should foreign manufacturers be allowed to remain ignorant and uneducated about our laws? The best defense is a good offence. That's why Hal

Stratton made the Office of International Programs in the first place. Take the importance of safety to the manufacturers and educate them about best practices in quality control rather than rely on high-cost policing and legal wrangling after hazards have already shipped for sale. Policing costs a lot more than prevention. An ounce of prevention is worth a pound of cure and *a safe marketplace is one with no need for recalls.*