

**Public consultation - Update for units of measurement directive**

**Subject :** TIA comments on 80/181/EEC (Metric only requirements)

To Whom It May Concern:

On behalf of the Toy Industry Association, Inc. (TIA) and our over 500 U.S. toy company members, I would like to make you aware of our thoughts and concerns regarding directive 80/181/EEC that requires a metric measurements only system for products and product information documents on the market in European Union countries beginning January 1, 2010.

TIA welcomes this opportunity to comment and in response to the European Commission's request for public stakeholder consultation, I would like to express TIA's strong support for a permanent extension of the current status quo allowing dual units of measurement, rather than a metric-only requirement

We believe this requirement would prove to be a trade barrier and an unnecessary expense on our industry without apparent value added to the consumer. It would also serve to further disharmonize regulations currently used in the United States and Europe.

Our members have not reported any problems with the current dual labeling policy, nor have they reported consumer complaints with the current system. The current system appears to work well to provide consumers with the appropriate product information needed to operate and enjoy our products throughout the world.

The toy industry is a global industry, with multi-language packaging and dual measurement labeling of dimension on jigsaw puzzles, length of race car sets, speed of cars, range for remote control vehicles, wingspan of models, and size of dolls, to give a few examples. Requiring companies to supply metric-only products in the EU would force some companies to fracture production lines, author and print separate packaging, consumer instructions, and create a dual warehousing system. Many small and medium toy companies would simply not be able to afford such duplication and thus be forced to discontinue doing business in Europe or raise consumer prices to match increased production costs.

Forcing metric only labeling would thus limit US manufacturer's export opportunities, but it would also affect European toy company counterparts' ability to sell their products in the United States. In a time when competition is forcing tighter constraints on production costs and the EU and US are working toward greater regulatory harmony it appears from our industry's perspective that the metric-only requirement in 80/181/EEC works against both the needs and efforts of EU and US manufacturing and consumer interests.

As the European Commission re-considers this important issue, we hope our comments will serve as constructive insight into how the metric-only requirement will negatively impact the toy industry.

Thank you for your consideration.



Carter Keithley  
President  
Toy Industry Association, Inc.

**Attachment**



1 March 2007

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Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Carter Keithley". The signature is written in a cursive, flowing style.

Carter Keithley  
President  
Toy Industry Association, Inc.