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DECEMBER 10, 2009  
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TO WHOM IT MAY CONCERN

I would like to officially respond to the Federal Register notice of September 11, 2009 (Volume 74, Number 175).

This initial determination proposes to update the list that is required by Executive Order No. 13126, in which you have added "Carpets made in Nepal"

I understand the necessity to monitor the use of child labor around the world, and as an importer of rugs made in Nepal and having first hand experience in the production and manufacturing of this product I can assure you that all of our manufacturers abide by moral and ethical guidelines in terms of fair wages, working conditions and most importantly the strict prohibition on the use of any form of child labor. Having extensive first hand knowledge of the Nepalese carpet production over the last 20 years, I have personally been in the Nepal factories from which my company, and my previous employers sources carpets and can state without hesitation that there is no forced or indentured child labor being used.

The topic of child labor in the manufacturing of rugs from Nepal has come under scrutiny and review of many government agencies over the past decade, DOL and the GSP program to name a couple, and after much review has not been removed from GSP and was not included on the 2001 Executive Order list. As the OCFT indicates in their summary of problems to be addressed in the current project "**Research on children working in the carpet industry of India, Nepal and Pakistan (SGA 07-11)**", "children currently working in the carpet industry in these three countries is unknown".

I understand that it is the responsibility of ILAB to monitor information in our industry and to try to determine if it is credible or not, and to make a determination whether you believe this product "MIGHT" have been produced or manufactured using child labor. I have taken the time to look at the Trafficking Victims report that DOL submitted to you and reviewed the 17 references that are listed on page 136/137 in the bibliography and can understand your challenge.

From the 17 references I came to the conclusion that if they are not comments from private individuals, they are NGO's that bring awareness to the public about child labor but do not have current data to substantiate their claims. Most of the references, as well as Rugmark, do however state that the use of child labor is on the decline. I reference Rugmark only because I see that the majority of the 17 references are associated with them in one way or another, and in most of the references themselves. **In my own experience, I have found many of the claims originating from Rugmark or related parties, to be factually incorrect or simply fabricated as to ensure continued funding for their administration costs.**

It is for this reason I am a supporter of the project by the OFCT, "**Research on children working in the carpet industry of India, Nepal and Pakistan (SGA 07-11)**". In which OFCT has contracted Macro International to provide independent, non-biased, professional research in regards to the use of child labor in the manufacturing of rugs made in Nepal. Additionally, I have been extensively involved in the implementation of ISO9001 and SA8000 standards and practices which have been recognized as the most useful and productive in improving the working environment for carpet making peoples.

Since Macro's data is not scheduled to be submitted to you until September 30, 2011, I respectfully request ILAB to remove Carpets made in Nepal from its proposed list subject to Executive Order 13126 until Macro International has had a chance to report to you and to ensure that the American's tax dollars were put to good use for this project.

Respectfully submitted,

Bill Ward  
Owner

