



HANDCRAFTED TIBETAN RUGS

I would like to officially respond to the Federal Register notice of September 11<sup>th</sup>, 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 manufactures abide by moral and ethical guidelines in terms of fair wages, working conditions and most importantly the strict prohibitive use of any form of child labor.

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 never been added to this list and as the OCFT indicates in there summery 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 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. Let's not forget that it was this very NGO that in the late 1990's under section 307 of the Trade Act of 1930 sought to bar the import of hand-made rugs from Nepal unless they bore a particular "child-free" label, in which their organization would profit.

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.

Since Macro's data is not scheduled to be submitted to you until September 30<sup>th</sup>, 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,

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