From: John Kurtz [john@newmoonrugs.com]

Posted At: Thursday, December 10, 2009 3:07 PM

Posted To: EO 13126

RE:

Notice of Initial Determination Updating the list of products...

With regards to any proposed addition of Nepal to the list of countries using child labor in the production of carpets, I would strenuously urge a complete and thorough examination of the situation in Nepal. As a long-time producer (since 1993) and former USAID team member advising Nepal on carpet production, I feel that any move stigmatizing Nepal's carpet industry by labeling it as child labor-exploitative would do much more harm than good.

Our firm is a founding member of Rug Mark in Nepal, and a long-time supporter of their successful efforts (and now those of the new organization, GoodWeave)- to eradicate the use of child labor in the industry there. These efforts have met with great success. I feel that anything that casts doubt on the industry at this point would only serve to throw it back to the state it was in a generation ago; in effect creating the kinds of conditions economically that will encourage child labor rather than eliminate it.

Please make every effort to examine closely the situation in Nepal with regard to carpet weaving before making any such change in the designation. I think it will be realized that Nepal is virtually there as far as having an industry free of child labor, and should actually be held up as an example of a success story to inspire further efforts elsewhere.

Very truly yours, John D. Kurtz New Moon Rugs