

April 2, 2014

State of Vermont  
House Committee on Fish, Wildlife and Water Resources  
115 State Street  
Montpelier, VT 05633-5301  
Attention: Rep. David L. Deen, Chair

Dear Representative Deen and Fellow Committee Members:

Burton Snowboards is committed to improving our environmental and social impact through an integrated global sustainability program, which includes a team solely dedicated to moving toward safer chemistry in all of our products. While we support the broader goals and objectives of state chemicals management legislation (with the ultimate goal being Federal legislation), we'd like to take this opportunity to reiterate the following critical recommendation that should be included in S.239 before Burton can support the bill. In our view, it's critical that we approach consumer products chemical management in the right way, with an eye toward the experiences of our sister states and nations in order to achieve the most successful long-term outcomes. As currently drafted, S. 239 will increase the regulatory compliance burden for businesses and may impede longer-term efforts to eliminate toxic chemicals. We recommend that the House Committee on Fish, Wildlife & Water Resources revise S.239 to reflect this important concept:

- **Phase-In Product Priority By Exposure:** The bill lacks a "Priority Product" concept and definition. The idea with a Priority Product designation is that it would create a phased approach to implementation and compliance with the near-term regulatory focus on products such as (1) cosmetics and beauty products which are ingested, topically applied or exposed directly to the skin; (2) products that may come in contact with the skin; (3) youth/children's products etc. Focusing regulatory efforts on the types of consumer products which are most likely to cause reproductive harm and have negative health effects is a model that has been adopted by other states and countries with similar toxic chemicals legislation and is considered by industry and chemical management experts alike to be a modern legislative approach to the concern being addressed by this Committee. As a result of the lack of any Priority Product or related sub-classification designation system, the scope of S.239 exceeds that of any current regulatory program of this type in other states.

Thank you for the opportunity to provide comments and suggestions.

Sincerely,



Jaime Heins, General Counsel, Burton Snowboards

For additional information or questions, please contact:

Ali Kenney  
Global Sustainability Director  
80 Industrial Parkway  
Burlington, VT 05401  
802.651.0351  
alik@burton.com