



Representing Household & Institutional Products

Aerosol - Air Care - Cleaners - Polishes  
Automotive Care - Antimicrobial - Pest Management

Testimony of the  
**CONSUMER SPECIALTY PRODUCTS ASSOCIATION**  
*Remarks on*  
**SENATE BILL 239**

*REGULATION OF TOXIC SUBSTANCES*  
*presented to the*

**SENATE COMMITTEE ON ECONOMIC DEVELOPMENT, HOUSING AND GENERAL AFFAIRS**  
**STATE OF VERMONT**  
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Chairman Mullin, Vice-Chair Baruth and distinguished members of the Senate Committee on Economic Development, Housing and General Affairs, my name is Owen Caine and I am Manager of State Affairs for the Eastern United States at the Consumer Specialty Products Association (CSPA). CSPA appreciates this opportunity to submit testimony **in Opposition to Senate Bill 239**. I would also like to thank the committee for allowing me to testify via telephone.

The Consumer Specialty Products Association (CSPA) is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution and sale of more than \$100 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments. CSPA member companies employ hundreds of thousands of people globally. Products CSPA represents include disinfectants that kill germs in homes, hospitals and restaurants; air fresheners, room deodorizers and candles that eliminate odors; pest management products for home, lawn and garden, and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day. Through its product stewardship program, Product Care®, and scientific and business-to-business endeavors, CSPA provides its members a platform to effectively address issues regarding the health, safety and sustainability of their products. For more information, please visit [www.cspa.org](http://www.cspa.org).

CSPA members are committed to manufacturing and marketing safe, innovative and sustainable products that provide essential benefits to consumers while protecting human health and the environment. CSPA member products improve the quality of human life and are necessary to protect the public health against dangerous diseases, infestation and unsanitary conditions. CSPA members are committed to providing products that are thoroughly evaluated for human and environmental safety and go through rigorous safety-based assessments before they are brought to market. CSPA members are also committed to clear and meaningful labeling on consumer products, *i.e.*, easily understood information to ensure safe and effective use and disposal. CSPA has a product stewardship program called Product Care® that assists

members in meeting these commitments. In addition, CSPA members routinely apply green chemistry and green engineering principles in their operations and have been honored with awards for their efforts.

Within SB 239, state agencies are tasked with identifying chemicals of high concern. These agencies are instructed to consider various criteria, including, whether the chemical is added to or present in a consumer product, present in the home. The mere presence of a chemical in a given product does not indicate harm. It is important that highly experienced experts make scientific safety assessments to ensure products may be used safely, and that product ingredients do not present unreasonable risk to humans or the environment.

Additionally, the process outlined in SB 239 appears woefully inadequate for making proper scientific judgments on the safe use of chemicals in specific products.

CSPA's member companies are staffed with highly experienced experts who effectively assess chemical hazard, know exposure and can successfully assess the risk of chemical usage in consumer products. Years of training and experience are required in order to become well versed in consumer product safety assessment. CSPA's member companies employ toxicologists that are highly qualified to make decisions about the appropriate use of chemicals in products. These professionals are masters and PhD-level scientists within our companies. CSPA's members know what chemicals are safe under foreseeable conditions of product use and misuse.

CSPA is also very concerned that the state does not have the requisite resources and personnel in order to even attempt to collect and process the required information for what will likely amount to thousands of products, much less, make appropriate product safety assessments for such a broad range of products to recommend product specific labeling requirements or potential bans. Furthermore, there is inadequate opportunity for industry or other third-party stakeholders to provide input into this process and the determinations made by the agencies.

Finally, the decisions made by the state could result in regulations differing from other states causing an expensive and unpredictable regulatory environment for Vermont manufacturers.

## **Conclusion**

CSPA members are committed to manufacturing and marketing safe products that are protective of human health and the environment while providing essential benefits to consumers. SB 239 would establish an expensive regulatory system, duplicative of other state and federal efforts at no benefit to Vermont consumers. For the reasons detailed above, we urge the members of the committee to ***oppose SB 239***.

I thank you for the opportunity to speak here today and appreciate you all taking the time to hear our thoughts and concerns. I am happy to answer any questions you might have.