

April 14, 2016

Vermont Chamber of Commerce Position Statement H.595

For the record my name is Chris Carrigan, and I'm the VP of Business Development with the Vermont Chamber of Commerce, which represents 1,500 member companies statewide. I also manage the Manufacturing Division and work with over 250 manufacturers that serve the Aerospace, Aviation, Consumer, Defense, Industrial, Medical, Naval and Space industries.

Having just become aware of the amendments to H.595 late last week, the statewide Vermont Chamber of Commerce is concerned with the fast-tracking of the bill without due diligence, consideration and appropriate input from all stakeholders.

The Vermont Chamber supports:

- A return and focus on the original scope of the bill regarding drinking water safety and testing for private wells;
- Harmonization and avoiding duplication of current regulations and information requests that already exist at both the state and federal level. For example, much of the proposed data collection in the information request section is already being gathered from manufacturers who submit an array of environmental reports to the State and already provide this information;
- A scientific approach, including definitions, to chemical hazard understanding: how a chemical is used, for example, and tested. Having such an approach will provide uniformity, clarity and certainty for our manufacturers – many of whom operate in compliance with existing state and federal laws and with international standards of quality assurance;

- Chemical regulation at the federal level. The prospect for real reform of the federal Toxic Substances Control Act (TSCA) is now underway, as both houses in Congress work to reconcile Senate Bill S.697 and House Bill 2576; and
- Protection of trade secret information, confidential business information or other information designated confidential by law.

Given the little time remaining in this Session and the many outstanding and unanswered questions, as well as the complexity in and around the information request, natural resource damages and chemical use sections, the Vermont Chamber supports and recommends a summer working group on the proposed amendments to make recommendations for the next Legislature. The Vermont Chamber recommends the working group consist of all stakeholders with well-balanced representation including scientists, technical experts, the regulated community and the State.

In closing, the Vermont Chamber encourages cooperation, coordination and partnership between the State and our manufacturers, many of whom are responsible, environmental leaders that provide Vermonters with employment and a high standard of living.

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