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I would like to offer a real-world perspective from a company that has been working to comply with Act. 188 as it was passed last year. Here is what I have found as it pertains to the wooden toy business:

Very few of the chemicals listed in the law ever find their way into finished children's products. A couple can be found in solvents that are used make the products but are unlikely to be present in the final product. We have been working to rid our plant of those chemicals under the theory that it would be easier to not have them present at all then to try to test to prove they are not part of our finished product. Testing, though not required, is the only true assurance of compliance if we don't want to leave ourselves open to liabilities. We already spend \$30,000 per year on testing to meet the federal safety requirements, which includes only about 15 chemicals.

Making compliance specifications on our suppliers has proven to be difficult. Bluntly put, Vermont's rules, and other state rules (other than California Prop 65), are not on the radar of most manufacturers and their supply chains. We have found that nobody else is asking the questions we are asking. If the laws pertained more broadly to the full range of child environmental exposures, it would be easier for us because there would be more public awareness. As a small company, we have very little influence in the product formulations we buy. We can look for alternatives and, if found, hope they work to the satisfaction of our customers. That has resulted in a mixed bag and certainly much more expensive options. We have gotten a couple suppliers to offer reformulations but since they are "customized" for us we have had damaging delays in getting needed supplies.

I truly believe in making sure the products we sell are safe. All people must also understand that safety is not a black and white absolute. The structure put into place last year, after much debate, is a fair way to evaluate chemicals as they come into question and doesn't need to be changed before it goes into full effect.

**I can agree that Act 188 is imperfect, because it has nearly none of the desired impact. It is window dressing that allows proponents to feel good about what they have done. First, from my experience to date, it is largely**

**being ignored in industry. My company is making adjustments, at increased cost where my competition is not. Act 188 has no monitoring or practical enforcement provisions. Second, the act does nothing to remove the greatest day-to-day chemical exposures that children face – automobiles, electronics (everything is becoming electronic) and home construction. Just think about the recent scare about contaminated flooring – which to my knowledge is not illegal in Vermont. Whether it is or is not covered under VT law, it shows the vulnerability of a child's complete environment.**