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MEMORANDUM

TO: Chair David Deen, Vice Chair Mary Sullivan and Ranking Member Steve Beyor

CC: Committee Members, House Committee on Natural Resources, Fish and Wildlife
Vermont House of Representatives

FROM: Jacob Cassady
Director, Government Affairs
American Cleaning Institute®

DATE: March 1, 2018

SUBJECT: **OPPOSE H.560** - An act relating to household products containing hazardous substances

The American Cleaning Institute's (ACI) purpose is to serve the growth and innovation of the U.S. cleaning products industry by advancing the health and quality of life of people and protecting our planet. ACI achieves this through a continuous commitment to sound science and being a credible voice for the cleaning products industry.

ACI appreciates the opportunity to provide comment on H.560. We believe that a cost effective system of shared responsibility for end-of-life product management currently exists, which includes all factors in the commercial chain including producers, consumers and government. This system has evolved, and continues to evolve, with shared costs and responsibilities between the parties.

ACI Respectfully Opposes H.560

As described in the February 22, 2018 draft of H.560, manufacturers of covered products who wish to offer their products to Vermonters would be forced to pay a yet-to-be-determined registration fee to a yet-to-be-established product stewardship organization.

ACI respectfully suggests that committee members consider the impact of these fees on consumers who, in the end, will see the price of their cleaning products increase. Whether costs are internalized in the local tax bill or in product cost, the consumer always pays in the end. The registration fees will cost "X" and the manager of the program will raise the funds to cover those costs.

Additionally, the hazardous substances language in the bill is written too broadly and could be read to unnecessarily include household cleaning products and create extra burdens for local governments and consumers alike. The inclusion of these products is unnecessary because the vast majority of cleaning products are water-soluble and are formulated for safe disposal in either

municipal or home wastewater treatment systems. Cleaning products do not typically contain ingredients that would harm the environment in the quantities that are disposed of by households.

The cleaning products industry has demonstrated its commitment to manufacturing sustainably while maintaining its social commitment to providing consumers of all economic levels with cost efficient cleaning products leading to improved hygiene. Any program that adds unnecessary costs must be scrutinized from that perspective as well.

Thank you for your attention and consideration of these comments. We urge the Committee to consider ACI's critique of H.560 against the decades long commitment our members have had to sustainability. For future reference, my contact information is (202) 662-2514 (direct dial) or via electronic mail at jcassady@cleaninginstitute.org.

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