

To: House Natural Resources, Fish and Wildlife Committee

From: Nathaniel Shambaugh

Date: February 26, 2018

Subject: H. 560

To The Committee,

Thanks you for the opportunity to submit comments on H. 560: The bill concerning Household Products containing Hazardous Substances. I am a retired chemist, having worked for the Vermont Agency of Agriculture for 30 years dealing with pesticides and other hazardous substances. Since retirement, I was hired by the Lake Champlain Basin Program, to compile all of the information available on toxic substances in our surface waters. Since then I have completed a preliminary risk assessment, which I presented at the recent Lake Champlain Research Conference, of this data to try to determine which compounds found in our surface waters are of most concern.

This risk assessment led me to realize how ubiquitous the potentially toxic substances in our waters are. I hope you will take the following in lieu of verbal testimony before the committee.

- 1) I strongly support your efforts to better regulate hazardous substances in Vermont. After hearing the testimony before the toxics workgroup last fall, I believe that it is vitally important that we work towards **ONE** “universal database of everything” containing not just hazardous substances and products, but also chemicals of high concern to children (ACT 188), pesticides, pharmaceuticals, and eventually emerging contaminants in personal care products. This database will obviously not be created quickly, but I believe you should be working towards that goal. Therefore I suggest you keep the reporting requirements in the original H. 560 bill, but merge it with the ACT 188 database within one agency, preferably an independent agency without vested interest in the data (perhaps the secretary of state’s office where ACT 188 data is reported?).
- 2) I would also like to suggest that you expand the reporting requirements to include not only substances toxic to humans but also to the fish, wildlife and other biota of Vermont. I believe it is short-sighted to not be thinking about environmental toxins when dealing with toxic substances.
- 3) I would also suggest that you remove the exclusion for “foods, drug, or cosmetics”. Consumer products, such as those containing Bisphenol A , should be included in the reporting requirements, if the agency decides to include that substance in their reporting requirements.
- 4) Overall, the bill as written is a great start, but it will not adequately address the issue which led up to this bill being introduced: the PFOA problem. If you only deal with compounds already deemed a “hazardous substance” then you will continue to have to chase down contamination from compounds which are now considered “emerging contaminants” but in future years will be considered “hazardous”.

Thank you for listening,  
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