

Written Testimony on S.103
House Committee on Natural Resources, Fish and Wildlife
Chris Carrigan, Vice President of Business Development
Wednesday, April 19, 2017

For the record my name is Chris Carrigan, and I'm the VP of Business Development with the statewide Vermont Chamber of Commerce, which represents 1,500 member companies statewide. I also manage the Vermont Chamber's Manufacturing Division and Supply Chain Program.

Chair Deen and esteemed members of this committee,

Per the Vermont Chamber's prior testimony provided on S.103 in the Senate Committee on Natural Resources and Energy, the statewide Vermont Chamber of Commerce considers the latest version following draft number 4.1 to be an improvement from the bill as originally drafted. The Vermont Chamber, however, has concerns and recommends the following:

- Along with experts with overlapping expertise, inclusion of manufacturing representation, including a manufacturer with direct experience in both reporting and compliance, on the citizen advisory panel;
- Inclusion of the Agency of Commerce on the Interagency Committee on Chemical Management, as additional administration, reporting and related costs will have an impact on commerce for our manufacturers; and
- Inclusion of the Agency of Digital Services on the Interagency Committee on Chemical Management to ensure the proper management and function of the IT system.

Additionally, the Vermont Chamber of Commerce supports:

- Safe products and avoiding the duplication of current regulations, processes and information and reporting requirements that already exist at both the state and federal level. Much of the data collection, for example, is already being gathered from our manufacturers that submit an array of environmental reports to the State and already provide information to operate in compliance with existing state and federal laws and environmental regulations, as well as with international standards to maintain certifications of quality assurance for their supply chain partners and customers.

The additional and proposed reporting requirements, as outlined in the toxic use reduction and reporting section, will add additional layers of administration, complexity and compliance costs for our manufacturers, as well as require additional funding, infrastructure, and administrative costs for the State. Added costs, in return, will place our manufacturers at a competitive disadvantage regionally, nationally and globally and will potentially result in reactionary measures, including:

- Price increases;
- Reduced investments in product development and innovation;
- Salary reductions;
- Resource actions; and
- Out-of-state relocation.

In closing, the statewide Vermont Chamber of Commerce advocates for the coordination of existing chemical reporting systems rather than a patchwork of state laws, which create added layers of administration, complexity, costs and a lack of uniformity, clarity and certainty for our manufacturers that operate in compliance with existing state and federal laws and that are responsible, environmental leaders providing Vermonters with employment and a high standard of living. The Vermont Chamber of Commerce asks that S.103 be amended with the above recommendations and to streamline the reporting and compliance requirements for environmental compliance at the state and federal level.

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