



The American Chemistry Council (ACC) is a national trade association representing chemicals and plastics manufacturers in the United States, including member companies in the State of Vermont. The chemical industry directly employs over 1,300 people in Vermont and indirectly supports another 2,000 jobs and generates over \$1 million in taxes, supporting the needs of Vermont and its residents.

Over 96% of all manufactured goods are directly touched by the business of chemistry, making this industry an essential part of every facet of our nation's economy. Chemistry provides significant economic benefits in every state including Vermont. Thanks to chemistry, our lives are healthier, safer more sustainable and productive than before.

ACC and its members have long been involved in ensuring that manufactured chemicals are safe for their intended use. ACC has worked with industry, government at all levels, public interest groups and scientific experts on standards and practices to protect human health and the environment from potential risks associated with the use of some chemicals.

However, legislation such as SB 103 does not provide the citizens of Vermont any measureable increase in safety and will only confuse the citizens of Vermont about what may truly pose a risk – all at great cost to taxpayer's and local businesses.

In 2014, the Vermont Legislature passed SB 239. It created a regulatory system that imposed a new burden on manufacturers of children's products. The initial reporting required under this system has just only begun, and the legislature is now contemplating a change to this program. Unfortunately, there are fundamental flaws that exist with the current structure, and those problems will only be compounded under SB 103.

Under Act 188, a Working Group of agency, environmental, manufacturing, and other stakeholders is responsible for recommending consideration of banning or restricting products before the Commissioner of Health initiates such rulemaking. The House-passed version of S.103 would remove this role of the Working Group and authorize the Health Commissioner to ban or restrict products on his or her own rulemaking authority. Such broad regulatory discretion for a single agency, let alone with the lowered standards discussed below, would be largely unprecedented. Although the joint Legislative Committee on Administrative Rules reviews new regulations, it has little to no real input on substance or authority to block rules from taking effect, and its review of rules is not a meaningful substitute for the legislative process or the current role of the Working Group.

Moreover, with the creation of the Interagency Committee on Chemical Management through executive order, there is no longer any need for S.103 as it passed the Senate last year. The ICCM has already commenced its work, including two public meetings with its Citizen Advisory Panel. On behalf of our members, we urge you to support sound science, useful and accurate information and economic growth in Vermont, and oppose SB 103.

