

**Testimony on S.103
Senate Committee on Natural Resources and Energy
Chris Carrigan, Vice President of Business Development**

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 Bray and esteemed members of this committee,

Regarding the revised version of S.103, the statewide Vermont Chamber of Commerce encourages cooperation, coordination and partnership between the State and our manufacturers and welcomes the changes.

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, as well as with international standards to maintain certifications of quality assurance for their supply chain partners and customers.
 - The additional reporting requirements originally proposed in S.103 would have added even more layers of administration, complexity and costs (including additional testing and certification) for our manufacturers. Added costs, in return, would place them at a competitive disadvantage regionally, nationally and globally and would potentially result in reactionary measures, including:

- Price increases;
 - Reduced investments in product development and innovation;
 - Salary reductions;
 - Layoffs; and
 - Out-of-state relocation.
- A federal solution and harmonization of regulatory standards and the recent reforms of the Toxic Substances Control Act (TSCA) at the federal level, which require the Environmental Protection Agency (EPA) to evaluate existing chemicals with clear and enforceable deadlines and evaluate chemicals on the basis of the health risks they pose.

In closing, the Vermont Chamber of Commerce advocates for the harmonization of regulatory standards and 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 welcomes the new language and effort to streamline and harmonize the reporting and compliance requirements for consumer product safety at the state level. The Vermont Chamber also recommends the inclusion of the Agency of Commerce on the Interagency Committee and manufacturing representation on the advisory group.

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