



March 15, 2017

To: The Honorable Sen. Bray, Chair  
Senate Committee on Natural Resource and Energy  
115 State Street  
Montpelier, VT 05633

Re: Testimony in support of S.103 Draft No. 1.1 – An act relating to the regulation of toxic substances and hazardous materials

Dear Senator Bray:

On behalf GLOBALFOUNDRIES, thank you for the opportunity to provide written testimony on Senate Bill 103, Draft No. 1.1, An act relating to the regulation of toxic substances and hazardous materials.

GLOBALFOUNDRIES finds Senate Bill 103, Draft No. 1.1, to be a significant improvement over the Bill as originally drafted. However, GLOBALFOUNDRIES still has concerns with the composition of the citizen advisory panel and the Interagency Committee on Chemical Management, and the charge of the Interagency Committee on Chemical Management. Therefore, we respectfully recommend the following changes:

Composition of Citizen Advisory Panel:

1. The panel should include experts from businesses that are subject to chemical reporting and regulation. While the Bill does call for persons with expertise in manufacturing products, it does not specify persons with experience in chemical reporting and regulation.
2. The panel should also include persons from institutes of higher education and retailers that are or would be subject to chemical regulation and reporting.
3. Before recommending legislative or regulatory action to the Interagency Committee, the citizen advisory panel should conduct hearings to receive testimony from businesses that would be impacted by such legislative or regulatory action.

Composition of Interagency Committee on Chemical Management:

1. The Interagency Committee on Chemical Management recommendations could have significant impacts to State commerce. Therefore we recommend including the Agency of Commerce and Community Development in the Interagency Committee to provide expertise on the economic impact of any proposed recommendations.
2. The Committee is charged with recommending how the State should establish a centralized or unified electronic reporting system. However, the Interagency Committee lacks expertise in data management and IT infrastructure. Experts in the field of IT and data management should be added to the Committee.

Charge of the Interagency Committee on Chemical Management:

1. The Interagency Committee on Chemical Management is charged with estimating the staff and funding necessary to administer the reporting system. Additionally, the Committee should be charged with estimating the cost of compliance for the

businesses, retailers, institutes of higher education and any other persons that would be impacted by the recommendations of the Committee. The Interagency Committee should also estimate the cost of additional resources that would be necessary for State outreach and technical assistance to businesses implementing changes to comply with the resulting regulations.

Thank you for your attention and consideration of these comments.

Sincerely,

Daniel Tukey  
Government Relations  
GLOBALFOUNDRIES U.S. LLC 2