



Written Testimony on S.295

House Committee on Human Services

Chris Carrigan, Vice President

June 24, 2020

Chair Pugh and members of this committee,

Regarding S.295, a bill regarding restrictions on the use, manufacture, sale and distribution of PFAS chemicals and compounds in firefighting foam, food packaging and rugs and carpets and expansion of the list of chemicals of high concern, and, as passed by the Senate, the Vermont Chamber is concerned with the impact on Vermont's manufacturers.

While the Vermont Chamber's Aerospace and Aviation Division supports the federal exemption regarding the use of firefighting foams containing PFAS compounds for aircraft rescue, the Vermont Chamber has several concerns with the bill as currently written. These include:

- Having a ban on such a wide array of products, agents and equipment will expose our manufacturers to further supply chain disruption, uncertainty and additional regulations and costs, and, subsequently, will place them at a competitive disadvantage; and
- Any addition of a PFAS chemical to the list of Chemicals of High Concern should be done based on the weight of credible, scientific evidence and reviewed by the Department of Health.

The Vermont Chamber supports a scientific approach, including definitions to aid chemical hazard understanding and how a chemical is used and tested. Having such an approach will provide uniformity, clarity and certainty for our manufacturers that operate in compliance with existing state and federal laws and with international standards of quality assurance. The Vermont Chamber also supports a federal solution and harmonization of regulatory standards and the recent reforms of the Toxic Substances Control Act (TSCA) at the federal level and the evaluation of chemicals based on the health risks they pose.

In closing, the Vermont Chamber of Commerce asks that S.295 be amended and to acknowledge the vast majority of manufacturers operate responsibly, with great care given to environmental considerations and in compliance with existing state and federal laws, while providing Vermonters with employment and a high standard of living.

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