

**Testimony on S.55**  
House Committee on Human Services  
Chris Carrigan, VP of Business Development  
April, 2019

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Chair Pugh and Committee Members,

As Vermont's largest statewide business organization, the Vermont Chamber of Commerce represents 1,500 members distributed throughout the State, encompassing virtually every industry. The Chamber is committed to growing our members' businesses while contributing to the overall Vermont economy.

Regarding S.55, a bill relating to the regulation of chemicals of concern, the Vermont Chamber 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 who submit an array of environmental reports to the State and already provide information to operate in compliance with existing and state and federal laws, as well as with international standards to maintain certifications and registrations of quality assurance for their supply chain partners and customers;
- The 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 and to facilitate compliance by businesses and any changes to streamline, modernize and improve the effectiveness of the Toxics Use Reduction and Reporting Program.

The Vermont Chamber, however, has concerns with S.55 and recommends the following:

- Key criteria for considering scientific evidence, including the restoration of the following language in section 4: “on the basis of the weight of credible, scientific evidence has determined that a chemical proposed for addition to the list meets both of the following criteria ...;
- Restoration of “upon the recommendation” of the Chemicals of High Concern Working Group language in section 4 to provide some degree of oversight and checks and balances to the proposed, unilateral authority of the Commissioner to restrict the sale of products based on potential exposure;
- Inclusion of a manufacturer with direct experience in both reporting and compliance, on the citizen advisory panel; and
- Explicit protection of trade secret information, confidential business information or other information designated confidential by law.

As provided in former testimony on S.103 (Act 188), the Vermont Chamber supports a scientific approach, including definitions to aid chemical hazard understanding and how a chemical is scientifically 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, 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 is opposed to S.55. If the Committee advances the bill, we ask that S.55 be amended to include the above recommendations. Doing so will better acknowledge that Vermont’s many manufacturers already operate in compliance with existing state and federal laws as part of their commitment to protecting Vermont’s environment, while providing Vermonters with employment and a high standard of living.