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## MEMORANDUM

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**To:** Chair Amy Sheldon, Vice Chair James McCullough and Ranking Member Harvey Smith

**CC:** Committee Members, House Committee on Natural Resources, Fish and Wildlife  
Vermont House of Representatives

**From:** Arielle Brown  
Senior Manager, Government Affairs  
American Cleaning Institute

**Date:** February 9, 2022

**Subject:** Oppose H. 115 – An act relating to household products containing hazardous substances

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The American Cleaning Institute® (ACI) is the trade association representing the \$60 billion U.S. cleaning products market. ACI members include the formulators of soaps, detergents, and general cleaning products used in household, commercial, industrial and institutional settings; companies that supply ingredients and finished packaging for these products; and oleochemical producers. ACI and its members are dedicated to improving health and the quality of life through sustainable cleaning products and practices. ACI's mission is to support the sustainability of the cleaning products industry through research, education, outreach and science-based advocacy.

ACI appreciates the opportunity to provide comment on H.115. This bill raises significant policy questions and implementation concerns with the creation of a new product stewardship organization for an end-of-life product management system. ACI remains committed to working with the Committee to continue to address these issues.

### **ACI Respectfully Opposes H.115**

As described in H.115, manufacturers of covered products who wish to offer their products to Vermont constituents would be forced to pay a yet-to-be-determined registration fee to a yet-to-be-established product stewardship organization.

ACI respectfully suggests that committee members consider the impact of these fees on consumers who, in the end, will see the price of their cleaning products increase. Whether costs are internalized in the local tax bill or in product cost, the consumer always pays in the end. The

registration fees will cost “X” and the manager of the program will raise the funds to cover those costs.

Additionally, the hazardous substances language in the bill is written too broadly and could be read to unnecessarily include household cleaning products and create extra burdens for local governments and consumers alike. The inclusion of these products is unnecessary because the vast majority of cleaning products are water-soluble and are formulated for safe disposal in either municipal or home wastewater treatment systems. Cleaning products do not typically contain ingredients that would harm the environment in the quantities that are disposed of by households.

The cleaning products industry has demonstrated its commitment to manufacturing sustainably while maintaining its social commitment to providing consumers of all economic levels with cost efficient cleaning products leading to improved hygiene. ACI takes end-of-life product management concerns seriously as our cleaning products have disposal directions on the back of packaging to inform consumers on how to properly recycle the remaining packaging. Any program that adds unnecessary costs must be scrutinized from that perspective as well.

Thank you for your attention and consideration of these comments. We urge the Committee to consider ACI’s critique of H.115 against the decades long commitment our members have had to sustainability. For future reference, my contact information is (202) 309-6526 (direct dial) or via electronic mail at [abrown@cleaninginstitute.org](mailto:abrown@cleaninginstitute.org).