



To: Environment Committee

Subject: Support for RHB- 5126 Establishing a Chemicals Innovation Institute

There is growing public demand for full disclosure of all chemical constituents in consumer products and elimination of all unsafe chemicals. REACH has changed the game by shifting the burden of proof to manufacturers. Previously, regulators had to establish unacceptable risks in order to impose regulatory controls. Manufacturers now have to demonstrate that a substance is safe to humans and the environment during normal use or reasonable misuse. Body burden studies trigger strong emotional reactions. No chemical is considered acceptable when found in breast milk. Advocacy groups are developing lists of unsafe chemicals that should be substituted immediately- e.g 356 substances of very high concern (SVHC) on the SIN list of the International Chemical Secretariat (<http://www.chemsec.org/list/about-sin>.)

At the same time, many companies see the strong public demand for more effective chemical management as a market opportunity. Clorox has launched a new product line targeted at people willing to pay for safer, healthier cleaners. SC Johnson is actively working to inform consumers about chemicals in products to build trust and brand loyalty. California has launched a broad green chemistry initiative to create innovative products with inherently safer chemicals that is expected to provide numerous health benefits while improving the competitive position of state businesses.

Regardless of what CT does, other regulatory regimes are moving forward with chemicals policy reforms. These requirements will impact CT businesses. Many of the proposed bans derive from toxic materials in consumer products, and are extended to all products. This can be challenging for precision manufacturing applications, where engineered materials are critical to product safety and performance specifications. Impacts on CT jobs could be amplified. Precision manufactured products often require special surface treatment to meet performance requirements for heat, wear, corrosion, etc. These processes often rely on chemicals with dangerous properties that must be managed with care. Precision manufacturers will prefer to locate their facilities close to treatment companies to reduce the cycle time of sending parts out for coatings. Failure to invest in green chemistry or safer alternatives could drive both the surface treatment companies and their customers from the state to regimes.

The Chemicals Innovation Institute could be a valuable resource to aid CT businesses in addressing emerging requirements for substituting dangerous chemicals. High technology applications often face expensive qualification testing to satisfy safety codes or validates technical performance, e.g. thermal creep properties. Finding cost effective ways for CT business to collaborate on the identification and qualification of safer alternatives could be an important roles for the institute. A central resource for monitoring regulatory developments in other states and countries and facilitating technology transfer among CT businesses would also be a useful role. It is common that safer alternatives require more



sophisticated and disciplined manufacturing processes, which will require more highly skilled labor. Thus, education is yet another important role for the institute, and this includes public education to build support for the policies it will take to promote a safe and healthy CT.

Perhaps the most significant benefit of establishing the institute is to send a clear signal that the common assumption that environmental protection costs jobs or impedes economic development is wrong-headed. Increasingly, success in global market will depend on economic efficiency *and* environmental excellence. This is especially important in high cost areas, such as CT. This kind of investment to promote an innovative and productive workforce is the only way to preserve CT manufacturing jobs.

Respectfully yours,

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