



Representing Household & Institutional Products

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Testimony of the
CONSUMER SPECIALTY PRODUCTS ASSOCIATION
*in **OPPOSITION** to*
SENATE BILL 274
An Act Concerning Chemicals of High Concern to Children
presented to the
JOINT PUBLIC HEALTH COMMITTEE
STATE OF CONNECTICUT
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Presented by: Sean Moore, Director, State Affairs – East Region

Chairwoman Gerratana, Chairwoman Ritter and distinguished members of the Joint Public Health Committee, my name is Sean Moore and I am Director of State Affairs for the Eastern United States at the Consumer Specialty Products Association (CSPA). CSPA appreciates this opportunity to appear before you today, **in opposition to Senate Bill 274** – a bill that would establish an expensive regulatory system, duplicative of other state and federal efforts at no benefit to Connecticut consumers.

CSPA is the premier trade association representing the interests of some 240 companies engaged in the manufacture, formulation, distribution and sale of \$80 billion annually in the U.S. of hundreds of familiar consumer products that help household and institutional customers create cleaner and healthier environments. Our products include disinfectants that kill germs in homes, hospitals and restaurants; candles, and fragrances and air fresheners that eliminate odors; pest management products for home, garden and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day. Through its product stewardship program, Product Care[®], and scientific and business-to-business endeavors, CSPA provides its members a platform to effectively address issues regarding the health, safety, sustainability and environmental impacts of their products. For more information, please visit www.cspa.org.

CSPA members are committed to manufacturing and marketing safe products that are protective of human health and the environment while providing essential benefits to consumers. CSPA member products improve the quality of human life and are necessary to protect the public health against dangerous diseases, infestation and unsanitary conditions. CSPA members are committed to providing products that are thoroughly evaluated for human and environmental safety and go through rigorous safety-based assessments before they are brought to market. CSPA members are also committed to clear and meaningful labeling on consumer products, *i.e.*, easily understood information to ensure safe and effective use and disposal. CSPA has a product stewardship program called Product Care[®] that assists members in meeting these commitments. In addition, CSPA members routinely apply green chemistry and green engineering principles in their operations and have been honored with awards for their efforts.

The consumer products industry develops products that meet or exceed safety requirements of all state and federal agencies in the United States and Canada charged with regulating those products, including the Connecticut Department of Energy and Environmental Protection, the Ozone Transport

Commission, the U.S. Consumer Product Safety Commission (CPSC), the U.S. Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), the U.S. Food and Drug Administration (FDA), Health Canada and Environment Canada.

Legislation is Overly Broad and Relies on Flawed Criteria

CSPA believes it is instructive to note that while this bill appears to focus on children's products, the definition of "children's product" encompasses "any product" that comes into contact with a child under 12, which will affect great numbers of Connecticut businesses, manufacturers and retailers.

The state agencies charged with identifying chemicals of high concern to children are instructed to consider various criteria, including, whether the chemical is added to or present in a consumer product, present in the home. The mere presence of a chemical in a given product does not indicate harm. It is important that highly experienced experts make scientific safety assessments to ensure products may be used safely, and that product ingredients do not present unreasonable risk to humans or the environment.

Legislation Does Not Provide for Sound Scientific Assessments

Additionally, the process outlined in SB 274 appears woefully inadequate for making proper scientific judgments on the safe use of chemicals in specific products.

CSPA's member companies are staffed with highly experienced experts who effectively assess chemical hazard, know exposure and can successfully assess the risk of chemical usage in consumer products. Years of training and experience are required in order to become well versed in consumer product safety assessment. CSPA's member companies employ toxicologists that are highly qualified to make decisions about the appropriate use of chemicals in products. These professionals are masters and PhD-level scientists within our companies. CSPA's members know what chemicals are safe under foreseeable conditions of product use and misuse.

CSPA is very concerned that the state does not have the requisite resources and personnel in order to even attempt to collect and process the required information for what will likely amount to thousands of products, much less, make appropriate product safety assessments for such a broad range of products to recommend product specific labeling requirements or potential bans. Furthermore, there is inadequate opportunity for industry or other third-party stakeholders to provide input into this process and the determinations made by the agencies.

Finally, the decisions made by the state could result in regulations differing from other states causing an expensive and unpredictable regulatory environment for Connecticut manufacturers.

Conclusion

CSPA members are committed to manufacturing and marketing safe products that are protective of human health and the environment while providing essential benefits to consumers. SB 274 would establish an expensive regulatory system, duplicative of other state and federal efforts at no benefit to Connecticut consumers. For the reasons detailed above, we urge the members of the Joint Public Health Committee to *oppose SB 274*. Thank you for considering CSPA's position on this important issue. I welcome any questions or discussion of CSPA's testimony and position.