



TESTIMONY
BEFORE THE CHILDRENS COMMITTEE
LEGISLATIVE OFFICE BUILDING
FEBRUARY 5, 2015

My name is Jennifer Herz and I am submitting this testimony on behalf of **Connecticut's Manufacturing Coalition** including the Manufacturing Alliance of Connecticut (MAC), New Haven Manufacturing Association (NHMA), the Smaller Manufacturing Association (SMA) and the Connecticut Business & Industry Association (CBIA) (the Coalition).

Connecticut's Manufacturing Coalition submits these comments in **opposition to HB 5653 – An Act Concerning Chemicals of High Concern for Children.**

While the Coalition appreciates the intent of this bill we are very concerned about the significant implications on the manufacturing community. This bill would have Connecticut's Department of Public Health compile a list of chemicals deemed potentially harmful, conduct assessments and make recommendations for the regulation or restricted use of such chemicals.

The Coalition's central concern is that creating a Connecticut-specific list, subject to change every few years, creates uncertainty and an unduly burdensome regulatory structure.

There is an existing set of comprehensive set of rules and regulations governing chemicals; including but not limited to:

- The Consumer Product Safety Improvement Act (CPSIA)
- The Consumer Product Safety Act (CPSA),
- The Child Safety Protection Act (CSPA),
- The Federal Hazardous Substances Act (FHSA),
- The ASTM Safety Specification on Toys, and
- The Toxic Substances Control Act.

Adding another layer of regulation, especially regulations that can change every few years, results in a confusing and burdensome system. Manufacturers are already tasked with following local, state, federal and even international regulations and even more rules specific to Connecticut makes it very challenging for manufacturers who utilize chemicals every day.

Further, uncertainty impacts the long term planning of manufacturers who have to make decisions and plans years in advance. In turn, this also impacts Connecticut's overall economic competitiveness since this list would be Connecticut-specific list.

Thank you again for this opportunity to offer the Coalition's comments.