



Testimony in Opposition to
HB 5653
An Act Concerning Chemicals of High Concern for Children
Committee on Children
Connecticut General Assembly
Hartford, CT
January 27, 2015

Introduction

The American Chemistry Council (ACC) very much appreciates this opportunity to provide testimony concerning chemicals of high concern for children. ACC is a national trade association representing the leading companies engaged in the business of chemistry in the United States, including member companies in the state of Connecticut.

Our members are committed to applying the science of chemistry to make innovative products and services that make people's lives better, healthier and safer. The products of chemistry in Connecticut are leading to cutting edge innovations here and across the country, enabling advancements in life-saving medical technology, aerospace, computing, energy efficiency and scientific research. ACC members are also committed to improved environmental, health and safety performance through Responsible Care®, health and environmental research and product testing.

Assessing product safety is more than simply noting the presence of a chemical substance in a product formulation. It also includes considerations of product use, public exposure, the functionality of chemicals in the product and potential unintended consequences of removal of a chemical from a product.

As a scientist in the ACC's Chemical Products and Technology Division, I am committed to ensuring the protection of human health. I support an informed chemical management process that utilizes up to date scientific information on hazard and exposure as the basis for decision making on the potential health risks posed by chemicals. This type of approach ensures that all relevant information is considered in an objective, systematic and transparent way in order to determine potential risk.

Unfortunately, HB 5653 does not adopt a scientific approach to identify priority chemicals at environmentally relevant levels. I would like to note three areas for the Committee's consideration as it reviews this proposed bill:

1. Identification of Priority Chemicals Should be Systematic and Risk-based

HB 5653 proposes to create a list of priority chemicals without applying systematic criteria that integrates chemical hazard information with relevant exposure information to identify those chemicals of potential concern to children. The bill permits chemicals to be added to Connecticut's priority list if they are simply present in biomonitoring



studies, the household environment or in consumer products used in the home. The U.S. Center for Disease Control (CDC) has stated clearly that “The presence of an environmental chemical in people’s blood or urine does not mean that it will cause effects or disease.”¹

The approach included in HB 5653, does not provide an objective, transparent way for prioritization which is based on scientific criteria that identify those substances that present both the highest hazard and greatest potential for exposure at relevant environmental levels which are likely to cause adverse effects. A systematic science based approach is the most effective way to ensure that the highest priorities have been identified and that the resources of Connecticut are focused on substances that pose a risk to children.

Over the last 30 years, advances in scientific techniques and knowledge have improved our understanding of how chemicals interact with the human body and the environment. Research programs within industry, academia and government have been greatly expanded to investigate the underlying biological process for chemical interactions. This has been done with the vision of applying this knowledge to improve the scientific basis of chemical policies and product stewardship. This Committee must consider an objective and transparent approach to identify and prioritize chemicals with the greatest hazard and potential for exposure at relevant levels. In this manner scientific data can be comprehensively evaluated, given appropriate weight, and integrated in a manner that provides a robust understanding of the potential hazards and risks that exposures to a substance could pose.

2. Recommended Actions on Priority Chemicals Should Be Science Based

HB 5653 notes that a report highlighting the status of priority chemicals will include at a minimum: recommendations to reduce children's exposure to the priority chemicals; a list of products that contain the priority chemicals; a summary of actions taken in other states to restrict children's exposure to the priority chemicals; an evaluation of the advantages/disadvantages of measures to reduce exposure to the priority chemicals and; an assessment of the feasibility of phasing out or banning products containing priority chemicals.

However, the bill is missing a critical step which involves the evaluation of whether an actual harm is posed by the presence of high priority chemicals in products that children are exposed. A full assessment to evaluate whether risks exist to children is necessary prior to recommending reducing exposures, phasing out products or banning products. Identifying priority chemicals for potential chemical regulation is an important step in implementing a sound chemical management program. However, understanding potential risk from relevant exposures and conducting risk assessments are crucial prior to taking any actions in order to ensure a meaningful public health impact.

¹Fourth National Report on Human Exposure to Environmental Chemicals; Website: http://www.cdc.gov/exposurereport/pdf/FourthReport_ExecutiveSummary.pdf on page 3.



3. Chemicals are Reviewed and Assessed at the Federal Level

Chemistry has enabled safer, healthier, more fulfilling and more convenient lives. Innovations in chemistry are vital to ensuring a healthy and plentiful food supply, clean air and water, efficient and affordable energy sources and life-saving medical treatments. The chemical industry takes very seriously its responsibility to help protect public health and the environment by manufacturing products that can be used safely. More than a dozen federal laws govern the safe manufacture and use of chemicals. EPA has programs currently in place to regulate chemicals and these programs help ensure the protection of public health, including children's health.

Under the Toxic Substances Control Act (TSCA) New Chemicals Program chemical information is submitted to EPA by companies interested in marketing a new chemical substance. EPA then uses this information to develop hazard and exposure profiles before it can be put on the market. EPA also has broad authority to request additional information and research on chemicals. EPA is also conducting risk assessments of its 90 priority chemicals under its Work Plan Chemicals Program.

Conclusion

I appreciate the opportunity to speak today and I hope this information has been helpful to emphasize the importance of utilizing hazard information in conjunction with relevant human exposure levels as the foundation for any chemical management legislation. ACC opposes HB 5653 and urges this committee to consider this information as it evaluates the utility and benefit of this bill to providing a public health benefit to the children of Connecticut.

