Senator Abrams, Representative Steinberg, Senator Somers and Representative Petit:

My name is Dan Moyer. I am Sr. Manager for Environmental Law and Policy Initiatives with the Consumer Technology Association (CTA). We submit this testimony in regard to House Bill 6516, a Proposed Bill pertaining to flame retardant chemicals in children’s products and residential furniture. Since a different bill, House Bill 7197, contains drafted statutory language on this matter, my comments will largely relate to that legislation.

CTA is the trade association representing the U.S. consumer technology industry. Eighty percent of CTA’s more than 2,200 member companies are small businesses and startups; others are among the world’s best known manufacturing and retail brands. Our member companies have long been recognized for their commitment and leadership in innovation and sustainability, often taking measures to exceed regulatory requirements on environmental design.

We support the language in HB 7197’s definition of “children’s product” which exempts consumer electronics. This recognizes that consumer electronics often use flame retardants to comply with UL safety standards regarding flammability and given the nature of this product category an exemption is important. We respectfully ask that the definition also include an exemption for products containing “electronic components and their associated casings.” There are a number of products like motorized baby swings and toys which, while not considered “consumer electronics,” still contain electronic components like printed circuit boards and wiring. These electronic components often utilize flame retardants in the same way that traditional electronic products do and should be exempted in the same manner.

CTA is opposed to the labeling requirements in HB 7197 which require a label on every consumer product sold in the state. This bill would require a label on any product used for personal, family, or household purposes whether or not it includes flame retardants. Adding a label to all products would be very costly to manufacturers while providing limited informational benefit to consumers. This bill would require manufacturers of all consumer electronics like phones, laptops, televisions, game consoles, printers, etc. to add a label on the product.

The proposed label requires, in part, a specific statement that “The State of Connecticut has determined that the fire safety requirements for this product can be met without adding flame retardant chemicals.” This statement would be incorrect for products that contain printed
circuit boards because they do utilize flame retardants to both meet flammability standards and function safely. The label would indicate that the state has determined that electronic products could meet flammability requirements without flame retardants, and we do not believe the state has done this. Any labeling requirement about safety should be backed up by strong scientific analysis.

For these reasons, we respectfully ask that you oppose HB 6516 and HB 7197. While we appreciate the exclusion of consumer electronics from the definition of “children’s product” in HB 7197, we ask that the exclusion be extended to also include electronic components of children’s products and, in HB 6516, to exclude electronic components of upholstered furniture. In addition, the labeling provision of HB 7197 would be costly while also neglecting the important role flame retardants still play in electronic products. Thank you for the opportunity to provide these comments. If you have any questions about our position on this issue, please do not hesitate to contact me at dmoyer@cta.tech.