

March 19, 2014

Dear Connecticut State Legislator:

We the undersigned urge you to oppose both HB 5354 and SB 126 that would establish a burdensome, unworkable chemical regulatory program that would only add to the increasingly complex patchwork of state chemical laws that are hampering economic growth in Connecticut.

The undersigned represent leading consumer product, chemical and other manufacturing interests in Connecticut. Over 96% of all manufactured goods are directly touched by the business of chemistry. More broadly, the products of chemistry in Connecticut help to enable cutting edge innovations throughout the manufacturing sector, enabling advancements in life-saving medical technology, aerospace, computing, energy efficiency and scientific research.

The U.S. Chemical industry invests more than \$16 billion annually in environmental, health safety and security programs. Our members are committed to the safety of our products and protection of public health. In addition, Innovation and growth within the manufacturing sector are vital to Connecticut's economic recovery. Manufacturing accounts for a significant portion of our state's economic output, employing tens of thousands of workers in our communities.

Unfortunately, state laws and regulations like HB 5354 and SB 126 would be another step backward for our state's economy. In the chemical sector alone, Connecticut dropped from 23rd to 37th in national rankings over the past 2 years. Unlike other states like North Carolina that are seeing production increases, Connecticut has lost more than a half of its shipments – dropping from \$8.4 billion to \$2.5 billion in two years.

As manufacturers that supply food, consumer goods and industrial products to the state of Connecticut, we believe that assessing product safety is more than simply noting the presence of a chemical substance in a formulation. It must also include considerations of product use, user exposure to the chemical in the product, and the functionality of the chemical in the formulation, as well as the unintended consequences of removal of a chemical from a product.

With this proposed legislation lacking such consideration, the process would only add uncertainty for Connecticut businesses including those that actually make products in the state and would force companies throughout the value chain including many of the industry's customers in the state to comply with yet another state regulatory program among an already crowded patchwork of state laws.

Instead of a state-by-state approach, we believe that our nation's federal chemicals management law must be updated to keep pace with scientific advancements and to ensure that chemical products are safe for intended use—while also encouraging innovation and protecting American jobs. In May 2013, the late U.S. Senator Frank Lautenberg (D-NJ) and David Vitter (R-LA) came together with a bipartisan group of Senators to introduce the Chemical Safety Improvement Act (CSIA) to reform the Toxic Substance Control Act. The CSIA is a sensible, balanced compromise that will promote safety, innovation, economic growth, and job creation – four essential goals that are important to all Americans. **On behalf of all of our memberships, we urge you to support economic growth in Connecticut and oppose HB 5354 and SB 126.**



Toy Industry Association, Inc.

