Maine Women's Lobby
THE VOICE OF MAINE WOMEN

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March 10, 2014

The Honorable John Shimkus
Chairman
Subcommittee on Environment and the Economy
Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Shimkus,

I am writing on behalf of the Maine Women's Lobby to express our opposition to the Discussion Draft of the Chemicals in Commerce Act (CICA). The Maine Women's Lobby advocates on behalf of Maine's 678,000 women and girls in the areas of economic security, access to health care, freedom from violence, and freedom from discrimination. Our members are deeply concerned that this legislation will not fix our broken chemical safety system – and will actually roll back what little oversight the federal government and state of Maine have now.

It is vital to reform the Toxic Substances Control Act (TSCA), which is ineffective and horribly outdated. However the CICA is not public policy that we or our members can support. There are many problems with the legislation as drafted. Those problems include that the CICA would:

- Roll back state product regulations like those we have passed in Maine, including information collection and disposal restrictions, and preempt future state action;
- Continue the legal standard and other hurdles in TSCA that prevent the EPA from taking action on the worst of the worst chemicals. CICA does not create a health-based standard for reviewing chemicals and instead places an insurmountable burden on the EPA before it can reduce risks to health;
- Weaken oversight of new chemicals, making it nearly impossible for the EPA to require health information for new chemicals before they end up in the products we use;
- Roll back the EPA's authority to restrict the use of existing toxic chemicals in products;
- Hide safety information from consumers by further restricting the EPA's ability to disclose broad categories of information and by "grandfathering" all the information claimed confidential in the 35 years of TSCA – without allowing the EPA to determine if there is an ongoing need for that confidentiality;

- Contradict the recommendations of the National Academy of Science and the American Academy of Pediatrics for how chemical safety should be reviewed, including explicitly protecting vulnerable populations.

We strongly believe that the federal government needs to take real and meaningful action to reduce the exposure of women and their families to the effects of dangerous chemicals in the products we use every day. CICA would instead create further inaction by the EPA and roll back what little progress we have been able to make in the states. This is especially concerning for pregnant women who want to be able to ensure a healthy pregnancy and for parents of young children who are often at greater risk from exposure to toxic chemicals.

To win the support of advocates for women and children in Maine, chemical safety reform legislation must protect vulnerable populations like pregnant women, children, and heavily impacted communities; increase access to health and safety information on chemical hazards; and allow states like Maine to pass our own toxic chemical laws with a health-based safety standard.

The Chemicals in Commerce Act would continue to put the health of American people at risk, increase the costs of health care for the many preventable diseases associated with toxic chemicals, and endanger the health of future generations. We urge that it not be formally introduced as a House bill and, instead, that a new effort be made by the Committee to legislate meaningful TSCA reform.

Sincerely,

Eliza Townsend
Executive Director
Maine Women's Lobby

Cc: Congressman Fred Upton, Chairman, House Energy and Commerce Committee

Congressman Paul Tonko, Ranking Member, House Energy and Commerce Subcommittee on Environment and the Economy

Congressman Henry Waxman, Ranking Member, House Energy and Commerce Committee