

**GORDON • FEINBLATT**  
ROTHMAN, HOFFBERGER & HOLLANDER, LLC

TODD R. CHASON  
410.576.4069  
FAX 410.576.4196  
tchason@gfirlaw.com

ATTORNEYS AT LAW  
233 EAST REDWOOD STREET  
BALTIMORE, MARYLAND  
21202-3332  
410.576.4000  
www.gfirlaw.com

February 24, 2011

**VIA HAND DELIVERY**

The Honorable Thomas M. Middleton  
Finance Committee (FIN)  
Miller Senate Office Building, 3 East Wing  
Annapolis, MD 21401

Re: Senate Bill 637

Dear Chairman Middleton:

This letter is written on behalf of the Maryland Industrial Technology Alliance ("MITA") regarding Senate Bill 637, which would require a chemical registry and regulatory system for Maryland. MITA **opposes** this bill and requests an unfavorable report for the following reasons:


- **Unnecessary:** For the last 35 years the Toxic Substances Control Act ("TSCA") and other federal laws have protected consumers and children in the marketplace. Although it may be time for reexamination of these statutes, that should occur nationwide at the federal level.
- **Nationwide consistency:** In the absence of any evidence that existing federal laws are inadequate, Maryland should avoid a patchwork scenario where businesses are forced to either have Maryland-specific products or avoid operating in the state altogether.
- **Bill is vague:** This bill provides no minimum threshold for qualifying as a "priority chemical," and indeed does not require any showing of an immediate health risk to the general population, including infants and young children.
- **Bill would be costly:** No funds are provided for the cost of testing the products covered by this ban. Manufacturers outside Maryland (and outside the U.S.) do not routinely list all ingredients since no federal or state law requires it. The cost would be enormous for Maryland retailers **and distributors** to test every existing and new product affected by the bill.

**GORDON • FEINBLATT**  
ROTHMAN, HOFFBERGER & HOLLANDER, LLC

The Honorable Thomas M. Middleton  
February 24, 2011  
Page 2

For these reasons MITA requests an unfavorable report on Senate Bill 637.

Very truly yours,



Todd R. Chason

cc: Finance Committee Members