

NORTH AMERICAN HAZARDOUS MATERIALS MANAGEMENT ASSOCIATION

NAHMMA

Policy Statement on Chemical and Product Policy Reform

The North America Hazardous Materials Management Association (NAHMMA) is a professional organization established in November of 1993, dedicated to pollution prevention and reducing the hazardous constituents entering municipal waste streams from households, small businesses and other entities that may be exempt from local, regional or national regulations. We are a non-profit, membership based organization, with a membership that includes individuals, businesses, government officials, and non-profit organizations from 30 US states, Canada and overseas.

NAHMMA **advocates for comprehensive overhaul of chemical policy in the U.S.** to provide greater protection of human health and the environment. In particular we support reform of the Toxic Substances Control Act, the federal law that governs the use of chemicals in commerce, to bring the U.S. in line with legislative reforms adopted by the European Union and Canada.

NAHMMA **advocates for comprehensive state product policy legislation** based on the Product Stewardship Framework Principles, developed with the assistance of the Product Policy Institute and adopted by a growing number of regional product stewardship councils, as well as the Principles of Product Stewardship formulated by the Product Stewardship Institute and adopted by the National League of Cities, Environmental Council of States, and other organizations.

NAHMMA recognizes connections between chemical and product policy approaches and **supports opportunities to maximize synergies of both approaches** to drive improvements in protection of human health and the environment.

NAHMMA supports Chemical and Product Policy Reforms that incorporate the following principles:

- Foster production of safer, less hazardous products.
- Shift responsibility away from government to producers (brand owners), for acquiring and sharing data on toxicity and environmental impacts in the case of chemical policy, and for management at end of-life in the case of product stewardship.
- Incorporate the costs of developing safer products and managing them at end of life into the producers' cost of doing business.
- Include industry compliance as a condition of sale of products.
- Include a continuing role for government in overseeing programs to ensure public safety, environmental quality and a level playing field for businesses.
- Continue to address problems chemical-by-chemical and product-by-product as needed, but work toward a comprehensive framework approach.
- Preserve the rights of local and state governments to regulate beyond federal regulations.

NAHMMA's vision for effective chemical and product regulation: the most hazardous chemicals are banned, reducing the toxicity of products and the potential for exposure to product users; safer alternatives are developed through green chemistry and promoted through testing, labeling and other mechanisms; and products are managed in closed-loop product stewardship systems, funded by those who make and sell the products.

A longer version of this statement, including background, online resources, and more detailed position statements will be available on NAHMMA's website, nahmma.org.