



SAN
FRANCISCO
CHAMBER OF
COMMERCE

August 24, 2017

The Honorable Mark Farrell, Chair
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102

RE: File No. 170867, Flame Retardant Chemicals in Upholstered Furniture and Juvenile Products

Dear Supervisor Farrell:

I am writing to thank you and your staff for arranging meetings to brief impacted retailers and manufactures on your proposed legislation to ban the use of various flame retardant chemicals in upholstered furniture and children's products. The San Francisco Chamber of Commerce certainly supports the goal of your legislation to remove potentially cancer causing agents from the home environment.

The staff of the Department of the Environment reported that their research found that the vast majority of retailers covered by this legislation already largely comply with the draft legislation. And, significant progress is being made through existing product notification laws to reduce use of these chemicals by manufacturers. What the Chamber is concerned about is the creation of a burdensome regulatory process and the "long arm of the law" attempting to compel compliance on retailers outside of the city, who may have no idea that San Francisco regulates these products differently than the State of California.

The Chamber is also concerned about provisions that extend the statute of limitation to four years, allow non-profit organizations a private right of legal action, and require what may be an unreasonably short period of time for retailers to sell off existing inventories and manufactures to change product content to comply with the legislation.

We understand that this legislation will be heard by the Small Business Commission on October 2 and in Board of Supervisor's committee on October 11. We would appreciate the opportunity prior to those meetings to meet with you to discuss our concerns and possible amendments to this legislation.

Sincerely,

Jim Lazarus
Senior Vice President of Public Policy

cc. Committee on Jobs, SFCDMA, California Retailers Association, Small Business Commission