

April 14, 2015

Honorable John Shimkus
Chairman
Environment and the Economy Subcommittee
Committee on Energy and Commerce
United States House of Representatives
Washington, DC 20515

Honorable Paul Tonko
Ranking Member
Environment and the Economy Subcommittee
Committee on Energy and Commerce
United States House of Representatives
Washington, DC 20515

RE: Subcommittee Hearing on the TSCA Modernization Act of 2015

Dear Chairman Shimkus and Ranking Member Tonko:

The American Cleaning Institute® (ACI) supports and has actively worked for the modernization of TSCA. ACI is the trade association representing the $30 billion U.S. cleaning products market. ACI members include the formulators of soaps, detergents, and general cleaning products used in household, commercial, industrial and institutional settings; companies that supply ingredients and finished packaging for these products; and oleochemical producers.

ACI and its members are dedicated to improving health and the quality of life through sustainable cleaning products and practices. These products provide essential benefits to consumers while protecting human health and the environment. ACI's mission is to support the sustainability of the cleaning products industry through research, education, outreach and science-based advocacy.

ACI commends the Subcommittee for its release of a bipartisan discussion draft of the *TSCA Modernization Act of 2015*. ACI urges prompt action on the measure. This draft legislation, along with the bipartisan legislation in the U.S. Senate, *The Frank R. Lautenberg Chemical Safety for the 21st Century Act* (S. 697), are important milestones in the effort to strengthen and modernize our nation's premier chemical management law.

A modernized TSCA has the potential to promote product innovations that our members have long used in developing sustainable cleaning products. In many ways, TSCA has fostered innovative developments in the U.S. and globally. A modernized TSCA would help contribute to public confidence in the chemicals used to manufacture consumer products and packaging. A strengthened TSCA has the potential to promote even greater innovation in the development of evermore sustainable cleaning products.

ACI urges Congress to ensure that updates to TSCA result in a credible and workable program for the EPA and industry; one that allows EPA to meet its regulatory obligations without unduly delaying or burdening innovation. The U.S. chemical management system must be risk-based and use the best science so as not to waste or misdirect resources. Improvements in the law should reflect recent progress in science and technology and advance further innovations. It is important that a modernized TSCA allow scientific developments and advances that enable EPA to use important information developed by industry to be incorporated into chemical safety assessments and determinations.

The modernization of TSCA is important to the cleaning products industry because a robust and credible federal program is crucial to the national uniformity that industry requires. Without this, the ability to be

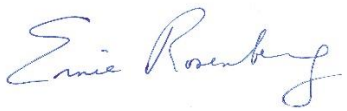
responsive to concerns that may be raised about chemicals in cleaning products — especially those concerns not based on reliable science — is significantly hampered.

TSCA must continue to provide robust, effective and predictable CBI protection and the discussion draft contains needed updates balanced with reasonable protections. This will provide industry confidence that it will be able to reap the benefits of its expenditures of both time and resources in research and development leading to the creation of more sustainable products. Limits on the ability of industry to preserve CBI and prevent illegitimate use of intellectual property would discourage innovation and hinder the introduction of safer chemical alternatives.

New products and greener chemistries get to U.S. consumers as fast as innovation allows because of the efficient method TSCA provides to accomplish this task. The TSCA premanufacture program is a better constructed process than any command and control regime which demands reams of data, irrespective of any health or safety concern. Hallmark features of the program that set the U.S. system apart from other regimes around the world include minimal delays, robust interactions between government and industry, and data flows all designed to meet key health and environmental goals. ACI applauds the decision to recognize the strength of the program reflected in the discussion draft.

ACI remains committed to a bipartisan, bicameral dialogue to advance the modernization of TSCA. ACI appreciates the opportunity to engage as a direct participant with you on the most critical issues related to updating the law in order to promote the safe use of chemicals; build public confidence in the chemical management system; protect American jobs, and maintain the U.S. global leadership role in chemical innovation.

Respectfully submitted,



Ernest S. Rosenberg
President & CEO

cc: Members of the Subcommittee on Environment and the Economy