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March 6, 2012

Honorable Terry Gerratana
Co-Chair
Public Health Committee
Room 3000, Legislative Office Building
Hartford, CT 06106

Honorable Elizabeth Ritter
Co-Chair
Public Health Committee
Room 3000, Legislative Office Building
Hartford, CT 06106

Oppose: Connecticut Raised Senate Bill 274

Dear Co-Chairs Gerratana and Ritter:

The American Cleaning Institute® (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. ACI's mission is to support the sustainability of the cleaning products industry through research, education, outreach and science-based advocacy. Since 1926, ACI has promoted health through personal hygiene and effective cleaning.

ACI is Engaged in Comprehensive Chemical Management Policy

ACI represents leading consumer product manufacturers who are committed to the safety of their products and maintaining the confidence of consumers. Product safety is the foundation of consumer trust, and our industry devotes enormous resources to ensure the safe use of our products. At the federal level, ACI is engaged with a range of policymakers and stakeholders to address chemical management in an effort to protect the public and the environment, and to retain U.S. leadership in chemical innovation.

ACI supports and has been working toward the federal modernization of the Toxic Substances Control Act of 1976 (TSCA). ACI is also a leader in chemical management activities with a national and global impact consistent with its mission. Two examples demonstrate this leadership. ACI continues efforts to compile baseline datasets of the health and environmental effects of High Production Volume (HPV) chemicals used in cleaning products. ACI is also a leading manager of global HPV chemical programs run by the International Council of Chemical Associations (ICCA) and the U.S. Environmental Protection Agency (EPA). ACI is also engaged in a wide variety of chemical management programs within EPA.

ACI General Comment Regarding Raised S.B. 274

ACI is opposed to S.B. 274. The legislation would require the development of a priority chemical list, and authorizes specific state agencies to regulate such chemicals, among other features of the legislation.

ACI members understand that through tiered risk assessment, we come to better understand the nature, magnitude, and impact products may pose to human health and the environment – while at the same time ensuring continued societal benefits and promoting consumer confidence in our products. This approach is knowledge-based and globally applicable, as demonstrated by the breadth of ongoing work that ACI is engaged with domestically and internationally. This work and engagement is also resource intensive. Any chemical management system is a substantial undertaking requiring extensive resources and expertise. Given current economic conditions, the Connecticut legislative proposal would be counterproductive in light of other ongoing and successful global and domestic chemical management work that ACI is engaged in.

ACI believes that a comprehensive chemical management system must provide a systematic, scientific and collaborative process to address priority chemicals and chemical uses of concern. Chemical management systems must have a reasonable, clearly defined approach for nominating, evaluating, and managing chemicals and it should apply to the whole of commerce. The Connecticut measure does not carry any of these important provisions. ACI would note that (and has testified previously at the federal level) that a priority setting process *must* be risk-based, taking into consideration both a chemical's hazards and potential exposures. Chemicals identified as the high priorities should be those substances with *both* the highest hazards and the highest potential exposures. The legislation does not provide for an adequate risk-based system.

Consistent with ACI efforts to modernize the federal TSCA noted above, ACI has provided extensive testimony and comment on a variety important chemical management policy concerns not fully recounted here. Thank you for your attention and consideration of these comments. For future reference, please use (202) 662-2508 or via electronic mail at dtroutman@cleaninginstitute.org.

Sincerely,



Douglas M. Troutman
Vice President & Counsel, Government Affairs

cc: Vice Chair Gayle S. Slossberg
Vice Chair Christopher Lyddy
Ranking Member Jason Welch
Ranking Member Jason Perillo
Public Health Committee Members