



american cleaning institute®

January 24, 2024,

The Honorable Thomas R. Carper
U.S. Senate
513 Hart Senate Office Building
Washington, D.C. 20510

The Honorable Shelley Moore Capito
U.S. Senate
170 Russell Senate Office Building
Washington, D.C. 20510

Dear Chairman Carper and Ranking Member Capito,

The American Cleaning Institute (ACI)¹ appreciates the opportunity to provide this letter for the record for the Senate Environment and Public Works Committee hearing titled *Oversight of Toxic Substances Control Act Amendments Implementation*.

ACI urges the Committee members to ensure the EPA abides by statutory obligations under TSCA for reviewing new chemicals. Most urgently, the Agency still needs to meet its statutory obligation to review and make final determinations on new chemicals within 90 days. ACI urges the Committee's consideration of the following as it examines TSCA implementation matters:

- EPA has considerably slowed the Pre-manufacture Notice (PMN) and Significant New Use Notice (SNUN) review process. Accordingly, an exceptional number of Notice submitters are being asked to “voluntarily” suspend the review process to respond to EPA information and data requests. EPA often seeks unnecessary information for the Agency to conduct its assessment under Section 5. Many reviews are now taking nearly two years to complete, resulting in significant delays, and the backlog appears only to be increasing.
- New chemical specialty products represent innovative new chemistries produced using improved manufacturing and processing techniques that reduce risk, exposure, and energy use. Discouraging the introduction of these new products by unnecessarily delaying market entry and imposing testing costs, often involving resource and time-intensive animal testing, will impede the commercial use of such risk-reducing products and their methods of manufacture and processing in the U.S.

Chemical innovation forms the foundation of most products in society and is key to a growing and vibrant, sustainable economy, including job creation. ACI stands ready to work with the Committee and EPA staff to implement the New Chemicals Review Program as the TSCA statute prescribes.

Sincerely,

Blake Nanney
Director, Government Affairs

¹ ACI represents the \$60 billion U.S. cleaning product supply chain. ACI members include the manufacturers and 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 chemical distributors. ACI serves the growth and innovation of the U.S. cleaning products industry by advancing people's health and quality of life and protecting our planet. ACI achieves this through a continuous commitment to sound science and being a credible voice for the cleaning products industry.