



american cleaning institute®

6 September 2023

Taylor Dunvin
Safer Choice Program
Office of Chemical Safety and Pollution Prevention
US Environmental Protection Agency

(via Federal eRulemaking Portal: <http://www.regulations.gov>)

RE: EPA–HQ–OPPT–2023–0311; FRL–11016–01–OCSP: Stakeholder Engagement Opportunity for the Safer Choice and Design for the Environment (DfE) Programs’ Potential Expansion Into New Product Categories

Dear Taylor Dunvin:

The American Cleaning Institute® (ACI)¹ is pleased to provide the following comments regarding the US Environmental Protection Agency’s (EPA’s) potential expansion into new product categories for their Safer Choice and Design for the Environment (DfE) Programs.

ACI’s member companies represent manufacturers, formulators, and distributors of cleaning products in the United States who will be impacted by Safer Choice and DfE’s proposed expansion of product categories. ACI and its members are dedicated to improving human health and quality of life through supporting the advancement of sustainable cleaning products and safe practices. ACI’s mission is to support the sustainability of the cleaning product industries through research, education, outreach, and science-based advocacy. ACI supports the addition of the following product categories to the Safer Choice and DfE programs: liquid laundry packets, dissolvable laundry sheets, and microbial-based cleaners. Liquid laundry packets are an efficient and sustainable product category due to the decrease in raw materials and water used for product formulation. Liquid laundry packets also ensure that consumers are using the correct measurement of detergent because packets are pre-measured. Dissolvable laundry sheets eliminate water consumption and waste generation. Microbial-based cleaners are increasing across the US due to the benefits microorganisms provide to cleaning uses. Microbial-based cleaners assist with odor mitigation and can clean deep cracks and crevices. While ACI supports the new programs, it also

¹ACI 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 the health and quality of life of people and protecting our planet. ACI achieves this through a continuous commitment to sound science and being a credible voice for the cleaning products industry.

wants EPA to ensure that the Safer Choice program continues to prioritize existing product categories to expedite the certification process. ACI member companies want to ensure they can release products with the Safer Choice logo, rather than launch the product while the Safer Choice certification is pending.

ACI supports the advancement of the Safer Choice and DfE programs. ACI members benefit from the Safer Choice Program Certification because it represents a high level of achievement in formulating products made with safer ingredients for consumers and the environment. By the Safer Choice Program expanding the certification to new product categories, it will continue to drive innovation within the cleaning/disinfecting/sanitizing industry and help consumers, businesses, and purchasers find products that perform and contain safer ingredients for human health and the environment. The Safer Choice Program also promotes outreach and science-based advocacy, furthering transparency of the ingredients used in cleaning products. To continue furthering transparency, any expansion into other product categories should involve the regulating agency (if not EPA) and the industry's stakeholders.

ACI looks forward to assisting the Safer Choice and DfE programs expansion and will continue to offer our support where needed to advance the use of safer products and ingredients across the cleaning industry.

Sincerely,

Darius Stanton, ACI Director of Regulatory Science and Innovation