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Re: Sustainable Chemistry Recommendations for the Interagency Sustainable Chemistry Strategy Team

Dear Co-Chairs of the Interagency Sustainable Chemistry Strategy Team,
The American Cleaning Institute (ACI)¹ is the nation's leading association representing the cleaning product supply chain. Our mission is to serve the growth and innovation of the U.S. cleaning products industry by advancing the health and quality of life of people and protecting the planet.

Driving more sustainable chemistries to scale in the market is critical to this goal. ACI appreciates the opportunity to provide input as you develop the Sustainable Chemistry Federal Strategy Report and ensure a long-term sustainable chemistry strategy.

1. Meet statutory requirements for new chemical reviews to ensure adequate approvals for sustainable chemistry solutions that are demonstrably safer and more sustainable.

ACI urges the U.S. Environmental Protection Agency (EPA) to meet its statutory obligations under the Toxic Substances Control Act (TSCA) for reviewing new chemicals. The EPA is failing to meet its requirements to review new chemicals within 90 days, which has created a bottleneck for new innovative, safer, and environmentally sustainable chemicals from reaching the U.S. market and building the respective benefits to scale. The lack of consistency and clarity for new chemicals reviews undertaken through EPA's Premanufacture Notification (PMN)

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 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.

process creates a disincentive for U.S. manufacturers to develop sustainable chemistry products and technologies that could otherwise play an important role in establishing a more permanently sustainable economy.

A worrying result is that companies are prioritizing other markets to roll out sustainable chemistry products, leading the U.S. market to lag behind in more sustainable offerings. This reality is apparent in the European Union (EU), where government regulators review these chemistries in a predictable timeframe, allowing for safer and more sustainable options to reach EU consumers. This issue has become so extreme that in some cases, we have been informed that certain companies have given up on bringing new chemistries to market in the U.S. ACI is committed to working with the Administration to ensure the speed to market of innovative U.S. chemistries to maintain the continued global competitiveness of the U.S. chemical market.

To further advance the U.S. sustainable chemistry market and enhance the sustainability of the U.S. chemical supply chain, EPA could consider methods to fast-track the authorization of new chemistries and products that meet the federal government's definition of sustainable. Doing so would provide a tool to both incentivize the development of such products and speed their entry to the market. As part of such a process, particular attention should be paid to bio-based chemicals, which currently require additional reviews by multiple other federal agencies. Updating the Coordinated Framework for Biotechnology, as proposed in Executive Order 14081, could improve inter-agency coordination in this regard and build momentum for more sustainable – and often safer - bio-based chemicals to reach the market.

2. Encourage Congressional leadership to expand the sustainable chemistry sector.

Considering that the chemical production sector is one of the largest domestic industrial sources of greenhouse gas emissions, the federal government has a unique opportunity to deliver a more sustainable and safer chemical sector through the investments provided by recent legislative accomplishments, including the Infrastructure Investment and Jobs Act, the Inflation Reduction Act, and the CHIPS and Science Act.

Moreover, federal incentives like tax credits have made progress in decarbonizing some critical sectors of the U.S. economy, and those lessons learned could be replicated to expand sustainable chemical manufacturing and broader product use among consumers. The exploration of a new federal tax credit rewarding entities that invest in sustainable chemical manufacturing would help close the market gap between incumbent chemistries – which have decades of market exposure but are not typically quantified as sustainable – and safe chemicals.

Additionally, requiring sustainable chemistry products, when available and possible, as a component of federal procurement policy could help expand the use of sustainable chemicals. Doing so would create an immediate boon for nascent sustainable chemistry manufacturers while growing consumer familiarity with sustainable chemistry product use in the broader economy.

3. Expand the sustainable chemistry workforce.

Establishing a more robust and permanently sustainable chemistry workforce is essential to satisfy the growing demands in this market space. Agencies should work to prioritize sustainable chemistry in already-established workforce development programs, such as the recently launched *American Climate Corps*, while Congress should adequately appropriate financial resources to

expand the sustainable chemistry workforce. As required through the Justice40 Initiative and established in Executive Order 140008, such workforce development efforts should focus on disadvantaged communities.

Ensuring that the Sustainable Chemistry Federal Strategy Report is written clearly and is understandable to non-expert individuals could help grow domestic interest in joining the sustainable chemistry workforce. We recommend the Report be written in plain and digestible language, provide versions in multiple languages, and avoid offensive or non-inclusive language.

4. Promote sustainable chemistry innovation through an initiative for greater coordination between government, academic, and industry leaders.

The federal government should shepherd a formalized process to incorporate input from academic and business leaders to reach new research or production milestones that improve quality of life and solve societal challenges. Cross-collaboration between these three key stakeholders could create positive results regarding technological breakthroughs and the innovation of more sustainable and safe chemicals. ACI encourages the exploration of funding collaborations for college students, faculty and staff to undertake research opportunities related to sustainable chemistry. An additional focus could include more direct federal agency collaboration with higher education to incentivize scholarly global thought leadership and output in this area.

As a component of a more formalized effort to coordinate among government, academic, and industry stakeholders, the federal government should focus on initiatives that encourage the maximum level of sustainable chemistry components possible. Such components should include sustainability factors like circularity, greenhouse gas reduction, decarbonization, safety, and disproportionate impacts on communities. This approach should be incorporated into relevant federal grants or awards and ensure that risks to workers and consumers are minimized.

5. Ensure environmental justice principles are incorporated into sustainable chemistry research and development and commercialization to advance environmental justice goals.

Supporting Environmental Justice Communities must be an utmost priority while bolstering the expansion of a sustainable chemistry market. Historically disadvantaged communities have faced a disproportionate impact on the health of community members resulting from pollution and environmental degradation. In the development of more sustainable chemistries, impact to, and involvement of such communities should be of great priority, so that all communities can see fair treatment, meaningful involvement, and equal protection with respect to the development, implementation and enforcement of environmental laws, regulations and policies.

Federal agency efforts to expand sustainable chemistry should consider the entire chemistry lifecycle and incorporate policy changes so that federal action not only does not harm, but simultaneously benefits the public and communities directly impacted by chemical production. This can be done most directly by ensuring access to sustainable chemistry products for the public, while also creating new equitable job and economic opportunities, particularly for historically disadvantaged communities.

The Sustainable Chemistry Strategy Team could explore methods to proactively identify environmental justice effects and establish measurable feedback forums to ensure ample opportunity to address such concerns before policy implementation. Ensuring a robust environmental justice outreach and participation program is critically important to ensure equitable outcomes as part of this process. We recommend programmatic alignment with the Administration's Justice40 commitment.

Conclusion

ACI thanks the Interagency Sustainable Chemistry Strategy Team for their consideration of these comments. The Strategy Team is embarking on a critical step to incorporate the definition of Sustainable Chemistry into appropriate areas of the federal government in order to drive sustainability in the chemical sector. This activity has the potential to greatly drive the development and use of safer and more sustainable chemistries throughout the U.S. market. Critical to this effort is the immediate improvement of EPA's New Chemicals program, without which, advancement of a U.S. sustainable chemistry market is an impossibility. A robust and competitive U.S. chemical manufacturing sector needs a functioning, predictable, and fair process to drive the development and use of a new generation of sustainable chemistries.

Sustainable chemistry is a critical area for investment and can be incorporated into many existing statutes in a meaningful way. Doing so now will ensure that investments made today will continue to align with sustainability goals throughout the lifetime of these programs, helping the U.S. to meet critical milestones needed to address climate change and other environmental concerns. It is also a critical point at which the development of sustainable chemistries can also include the meaningful involvement of all U.S. communities to help build a sustainable chemistry workforce.

Sincerely,



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