



american cleaning institute®

February 2, 2021

Ms. M. Patricia Smith
Senior Counselor to the Secretary of Labor
U.S. Department of Labor
Occupational Safety and Health Administration
U.S. Environmental Protection Agency (EPA)
200 Constitution Ave., NW
Washington, DC 20210

Re: Executive Order on Protecting Worker Health and Safety

Dear Ms. Smith,

I write on behalf of The American Cleaning Institute® (ACI)¹ in regards to the Executive Order on Protecting Worker Health and Safety. The goal of ACI is ensure a robust supply and availability of finished cleaning, sanitizing and disinfecting products critical to combating the novel coronavirus to market and increasing the supply of ingredients to accomplish this goal.

ACI member companies have increased production and are operating around the clock to produce vital products to protect individuals from the spread of COVID-19 and to meet the dramatic expansion in demand.

ACI commends the action taken by OSHA to expand efforts to protect worker health and safety during the ongoing pandemic. However, ACI believes that the guidance should include not only alcohol-based hand sanitizers, but all FDA-approved hand sanitizing products. In so doing, the OSHA guidelines would expand the toolkit available for employers to protect workers during the pandemic. ACI recognizes that under FDA regulation, hand sanitizing products cannot make anti-viral claims, however, hand hygiene is an essential tool in preventing the spread of pathogens and is a basic component of a science-based approach to worker safety.

In addition, the Executive Order asks that such a campaign include engagement with in stakeholders, including industries. As the voice of the Cleaning Products Industry, ACI offers its expertise to OSHA in future consultation for crafting safety guidance for worker protection.

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.

Thank you for your attention to comments and interests of the members of the American Cleaning Institute. ACI reserves the right to amend or update these comments in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Nathan Sell". The signature is fluid and cursive, with a large initial "N" and "S".

Nathan Sell
Director, Regulatory Science

CC: James Kim, Vice President, Science and Regulatory Affairs
Kathleen Stanton, Associate Vice President, Technical and International Affairs