



## The Soap and Detergent Association

---

VIA ELECTRONIC MAIL

April 22, 2009

Honorable Rebekah Warren  
Chair, Great Lakes and Environment Committee  
Michigan House of Representatives  
521 House Office Building  
Lansing, MI 48909

**RE: OPPOSE**  
**Bill Package: HB 4763 – 4769 “The Children’s Safe Product Act”**  
**Hearing Scheduled in Committee, April 22-23, 2009**

Dear Chairwoman Warren:

The Soap and Detergent Association (SDA) opposes the package of bills scheduled for hearing this week. SDA is a one-hundred plus member trade association representing the \$30 billion U.S. cleaning products market. SDA 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.

SDA and its members are dedicated to improving health and the quality of life through sustainable cleaning products and practices. SDA’s mission is to support the cleaning product and oleochemical industries through research, education, outreach and science-based advocacy. Founded in 1926, a major component of the SDA mission has been the promotion of improved health through personal hygiene and effective cleaning.

### **SDA Engagement with Chemicals Management Policy**

SDA 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.

The SDA has consistently urged a federal approach to chemicals management. SDA recently wrote to Congress to support legislative enhancements to the Toxic Substances Control Act of 1976 (TSCA) as federal legislators undertake the process to examine the law. We have urged the creation of a federal stakeholder process that recognizes the critical role played by the consumer products industry. SDA recommended that improvements to TSCA should recognize changes in science and technology; establish deadlines for review of priority chemicals; ensure that the U.S. Environmental Protection Agency (EPA) has timely and adequate information on use and exposure; leverage ingredient or chemical management programs undertaken by other nations; and, promote innovation, among other recommendations.

SDA and its members have participated in chemical activities with a national and global impact. In 2008, SDA noted the success of a decade-long, comprehensive effort to compile baseline datasets of the health and environmental effects of High Production Volume (HPV) chemicals used in cleaning products. SDA is a leading manager of chemical consortia fulfilling commitments to the voluntary global HPV chemical programs run by the International Council of Chemical Associations (ICCA) and the EPA. A report detailing the work of the SDA data-gathering, *Meeting the Challenge: A Progress Report on SDA*

*Commitments under Voluntary High Production Volume Chemical Programs*, can be found at [www.cleaning101.com/environment](http://www.cleaning101.com/environment).

The report demonstrates that manufacturers have gone beyond the basic requirement for disclosure of hazard datasets, and have compiled information on chemical uses and exposures, prepared screening level risk assessments, and published research in peer-reviewed publications. The report is also a demonstrable asset in global chemical management programs.

SDA also encourages policymakers to make use of sound scientific methods of review recognized by other nations, governments and authoritative bodies including the: Canadian Domestic Substances List prioritization; the Security and Prosperity Partnership of North America Regulatory Cooperation Framework; and, the EPA and OECD High Production Volume Chemical programs.

#### **SDA Comment on HB 4763 – 4769:**

The ongoing work and engagement of various domestic and international activities concerning chemical management are resource intensive. To be sure, any chemical management system is a substantial undertaking requiring extensive resources and expertise. Given current economic conditions, and the presence of recognized and established chemical management systems, the plan proposed for Michigan would be highly counterproductive in light of ongoing and successful chemical management work.

The legislative package would mandate the use of “safer alternatives” to be determined by a governmental agency without full or complete expertise in, among others, product development, scientific or manufacturing processes. Moreover, the legislation would allow the designated agency to determine product manufacturing largely based on the hazard potential of a chemical. As the committee is aware, California enacted legislation into law granting agency regulatory authority over chemicals in consumer products. An important difference between the California law and the proposed Michigan legislation is the range of risk management measures. The Michigan legislative proposals do not accomplish any of these critical goals or measures.

SDA 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. Our approach is knowledge-based and globally applicable, as demonstrated by the breadth of ongoing work that SDA is engaged with domestically and internationally.

To that end, SDA recommends that any chemical management system provide a systematic, scientific and collaborative process to address priority chemicals and chemical uses of concern. This would include the prioritization of chemical uses of concern and potential alternatives based on hazard and exposure to the chemical; it would also contemplate specific applications in a systematic approach as applied to the whole of commerce. Any chemical management initiative must have a reasonable, clearly defined approach for nominating, evaluating, and managing chemicals and it should apply to the whole of commerce. The current Michigan measures do not carry any of these provisions.

#### **SDA Is Engaged in Promoting Cleaning and Health and Information for Consumers**

Cleaning products have improved public health by improving personal hygiene, reducing infant mortality rates and the overall decline of disease transmission. SDA works closely with the Centers for Disease Control and Prevention (CDC) and many other public and private entities in promoting public health. Two examples (with more information available at the SDA website [www.cleaning101.com](http://www.cleaning101.com)) demonstrate this commitment:

- SDA works in cooperation with the CDC on the “*Healthy Schools, Healthy People It’s a SNAP (School Network for Absenteeism Prevention)*” program. This is an annual national contest with

middle schools competing to develop the most effective handwashing communication program. The SDA and CDC work together to present an award to the winning middle school.

- SDA has also teamed up with the National Education Association (NEA) Health Information Network and the CDC to create the *National C.L.E.A.N.™ - Custodial Leaders for Environmental Advocacy Nationwide* award to recognize the contributions that custodians make to public health in their schools, communities, and their profession.

SDA has developed an ingredient communication initiative to provide consumers with information about the ingredients in cleaning products. Three additional categories: air care, automotive care, polishes and floor maintenance products are also addressed via the initiative in cooperation with two manufacturing trade associations. Two key aspects of the program include:

- The creation of a uniform system for providing ingredient information to consumers in a meaningful and easy-to-understand way. This initiative provides different means to inform consumers about the ingredients in products: on the product label; on the manufacturers', distributors', or importers' website; through a toll-free telephone number; or through some other non-electronic means.
- Building on the already strong foundation the industry has established for sharing information with consumers, the program is based largely based upon the labeling conventions in use today in the U.S. for food, drugs and cosmetics that consumers are already familiar with. This initiative builds upon the comprehensive labeling systems currently in Canada and the United States.

## Conclusion

Thank you for your consideration of these comments on behalf of SDA members. The association's members take pride in formulating safe and efficacious products, and we would take this opportunity to remind the Committee of the economic and social benefits of products and chemicals. SDA is the association for cleaning products, and stands ready to serve as a resource to the State of Michigan. The soap and detergent industry develops products that meet or exceed safety requirements of all state and federal agencies in the United States.

Thank you for your attention and consideration. For future reference, please contact me at (202) 662-2508 or via electronic mail at [dtroutman@sdahq.org](mailto:dtroutman@sdahq.org).

Sincerely,



Douglas M. Troutman  
Director, Government Affairs

cc: Members, Great Lakes and Environment Committee

