



Representing Household & Institutional Products

Aerosol - Air Care - Cleaners - Polishes
Automotive Care - Antimicrobial - Pest Management

July 24, 2012

The Honorable Frank Lautenberg
United States Senate
324 Hart Building
Washington DC 20510

Dear Senator Lautenberg:

The Consumer Specialty Products Association (CSPA) appreciates your efforts to develop legislation to modernize the TSCA statute that was enacted in 1976. We commend you for engaging Senator(s) Vitter, Inhofe, Crapo and Alexander in this process. A broad cross-section of industry agrees that TSCA needs to be modernized, but the issues are complex and far-reaching—and will impact almost every aspect of commerce. Nevertheless, meaningful and effective reform is possible if all sides come together to support a transparent, bipartisan process.

We also appreciate you opening the door to discuss the impacts of this legislation on the consumer products industry; and we encourage legislators to consider and build on this progress as discussions continue toward bipartisan legislation.

For several years, CSPA has stated our support for a modernized TSCA that is based on assessment of risk; protects the ability of U.S. industries—including the formulated consumer and commercial products industry—to innovate and to compete in the global marketplace; protects public health and the environment; and protects confidential business information (CBI). Within these parameters, CSPA has worked closely with your staff on necessary improvements to S. 847, most notably, the CBI provisions of TSCA Section 14.

As a result, significant changes have been made to provisions of TSCA Section 14. For example, the legislation removes the limit on CBI protection that would have imposed a single, non-renewable five-year period on every CBI claim; eliminates the exclusion of chemical identity from eligibility for CBI protection; and adopts the CSPA recommended “three-bucket approach” to designate categories of information for protection. These changes, among others, represent great progress in the dialogue, and will serve to protect a company’s ability to innovate and compete. The significant and positive improvements to Section 14 demonstrate the value of engagement on these important and complex issues.

While acknowledging the significant progress that has been made, CSPA must emphasize that we cannot support the provisions of S. 847 in its entirety. There are other sections of the bill that concern our member companies, including a workable safety standard, data requirements and, very importantly, how a chemical will be prioritized for further review.

In closing, we strongly encourage continued commitment to work through the bipartisan process established with Senators Vitter, Inhofe, Crapo and Alexander to develop legislation that all parties can support.

Sincerely,

A handwritten signature in black ink that reads "Chris Cathcart". The signature is written in a cursive, flowing style.

Christopher Cathcart
President and CEO
Consumer Specialty Products Association

Cc: The Honorable Barbara Boxer
The Honorable James Inhofe
The Honorable David Vitter
The Honorable Michael Crapo
The Honorable Lamar Alexander

About CSPA

The Consumer Specialty Products Association (CSPA) is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution and sale of more than \$80 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments. CSPA member companies employ hundreds of thousands of people globally. Products CSPA represents include disinfectants that kill germs in homes, hospitals and restaurants; candles, and fragrances and air fresheners that eliminate odors; pest management products for home, garden and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day. Through its product stewardship program, Product Care[®], and scientific and business-to-business endeavors, CSPA provides its members a platform to effectively address issues regarding the health, safety and sustainability of their products. For more information, please visit www.cspa.org.