



November 19, 2010

Administrator Lisa P. Jackson  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

**Re: Docket ID EPA-HQ-OPPT-2009-0187**

The Consumer Specialty Products Association, Environmental Defense Fund, and Safer Chemicals Healthy Families all commend the Environmental Protection Agency (EPA) in its efforts to strengthen chemical management in the United States through its proposed amendments to the Inventory Update Rule (IUR). We believe that processor reporting of use and exposure information will enhance the quality of information available to the Agency, including for use in informing prioritization and safety assessments of chemicals in commerce. Our three organizations have been working together to discuss how best to achieve effective processor reporting of use and exposure information, which is a clear demonstration of our mutual interest in providing EPA with reliable use and exposure information on chemicals in commerce. We believe this addition to current reporting schemes is a necessary advancement to strengthen our US chemicals management system.

The undersigned organizations look forward to working with EPA on this very important issue.

Sincerely,

Philip Klein  
Senior V.P., Legislative  
Affairs  
Consumer Specialty Products  
Association

Richard A. Denison, Ph.D.  
Senior Scientist  
Environmental Defense Fund

Andy Igrejas  
Campaign Director  
Safer Chemicals, Healthy  
Families

Cc: Wendy Cleland-Hamnett, Environmental Protection Agency  
Jim Jones, Environmental Protection Agency  
Steve Owens, Environmental Protection Agency  
Robert Sussman, Environmental Protection Agency

**About CSPA**

The Consumer Specialty Products Association (CSPA) is the premier trade association representing the interests of some 240 companies engaged in the manufacture, formulation, distribution and sale of \$80 billion annually in the U.S. of hundreds of familiar consumer products that help household, institutional and industrial customers create cleaner and healthier environments.

**About Environmental Defense Fund**

Environmental Defense Fund ([edf.org](http://edf.org)), a leading national nonprofit organization, creates transformational solutions to the most serious environmental problems. EDF links science, economics, law and innovative private-sector partnerships.

**About Safer Chemicals, Healthy Families**

The Safer Chemicals, Healthy Families coalition represents more than 11 million individuals and includes parents, health professionals, advocates for people with learning and developmental disabilities, reproductive health advocates, environmentalists and businesses from across the nation, all working for comprehensive reform of the Toxic Substances Control Act (TSCA).