



Innovative Products For **Home. Work. Life.**

March 17, 2021

via electronic transmission

Alberta E. Mills
Division of the Secretariat
U.S. Consumer Product Safety Commission
4330 E W Hwy
Bethesda, MD 20814

Re: Agenda and Priorities FY 2022

Dear Ms. Mills,

The Household & Commercial Products Association¹ (HCPA) appreciates the opportunity to provide comment to the U.S. Consumer Product Safety Commission (CPSC) as the Commission prepares its agenda and priorities for fiscal year 2022. The CPSC's mission of keeping consumers safe is the utmost importance to us all. HCPA and its members have been at the forefront of keeping consumers safe by ensuring that consumers have access to the cleaning products and disinfectants to maintain a healthy home and support CPSC in its mission.

HCPA represents a wide range of trusted and familiar household and commercial products. In addition to disinfectants that kill germs and cleaning products for use throughout the home, HCPA also represents air fresheners, room deodorizers and candles that eliminate odors; pest management products for home, lawn and garden, and pets; floor and furniture maintenance and polish products; products used to protect and improve the performance and appearance of automobiles; products that utilize the aerosol delivery form and a host of other products used every day. Through its scientific and business-to-business endeavors, HCPA provides its members a platform to effectively address issues regarding the health, safety and sustainability of their products.

HCPA would like to thank CPSC for enacting measures during the unprecedented pandemic that allow manufacturers flexibility for compliance without sacrificing safety for consumers such as the Poison Prevention Packaging Act (PPPA) Enforcement Discretionary Testing Advisory

¹ The Household & Commercial Products Association (HCPA) is the premier trade association representing companies that manufacture and sell \$180 billion annually of trusted and familiar products used for cleaning, protecting, maintaining, and disinfecting homes and commercial environments. HCPA member companies employ 200,000 people in the U.S. whose work helps consumers and workers to create cleaner, healthier and more productive lives.

Letter.² This letter and its subsequent extension³ allows companies to utilize alternative protocols to the procedures found in the 16 CFR §1700.20 while continuing to ensure that their products are designed with appropriate child-resistant and senior-friendly packaging. HCPA recommends CPSC continues to allow flexibility such as this until we are past the pandemic so that companies can continue to provide consumers with the products that they need to remain safe.

HCPA also applauds CPSC's ongoing leadership on ensuring the safety of consumers with respect to the growing issue of counterfeit products. Reorganizing the Office of Compliance and Field Operations' (EXC's) Internet Surveillance Unit (ISU) to centralize ISU personnel on a single team under one ISU supervisor to address increased volume of ensuring compliance through e-commerce, including counterfeit and/or noncompliant products that pose a safety risk was an important step in managing this problem. However, HCPA recommends that CPSC develop metrics to measure and communicate the efficiency and effectiveness of this action. With consumers purchasing more products through e-commerce platforms, both consumers and manufacturers and marketers of compliant products need CPSC to monitor various online sales channels for products that may present health and safety risks to Americans. Holding the various online sales channels to the same accountability of brick-and-mortar retailers is essential to keep consumers safe.

HCPA appreciates the opportunity to provide these comments to CPSC and is committed to continuing to work with the Agency to ensure that consumers have access to the products they need to improve their daily lives. If you have any questions about our comments, please do not hesitate to contact me at ngeorges@thehcpa.org.

Respectfully submitted,



Nicholas B. Georges

Vice President, Scientific & International Affairs

² Available at https://www.cpsc.gov/s3fs-public/PPPA-Enforcement-Discretion-Testing-Advisory-Letter.pdf?PVOChQ.wUA5OezILLHmy23qqk6q9_IdS

³ Available at <https://www.cpsc.gov/s3fs-public/PPPA-Enforcement-Discretion-Extension-Letter.pdf?wml2KToweYpjGU.Y3bXc0TCPA09TEi.V>