

March 15, 2021

Michael Regan, Administrator
US Environmental Protection Agency
1200 Pennsylvania Ave, N.W.
Washington, DC 20460
Via email at Regan.Michael@epa.gov

RE: Restore Safer Choice Program

Dear Administrator Regan:

We are writing to express our strong support for the Environmental Protection Agency (EPA) Safer Choice Program as well as our concern for its long-term viability. The signatories to this letter represent a unique and broad group of chemical manufacturers, brand owners, environmental non-governmental organizations, states, municipalities and retailers. During the last four years, resources and leadership have been drained from this critical program. Despite requests to EPA from multiple organizations and the agency's assurance the Safer Choice Program would continue to operate at the same level of service, we have observed that the opposite has occurred.

For most of its existence, this unique and valuable program was organized within its own branch, staffed with as many as 13 full-time employees, including a branch chief, toxicologists and chemists. In the last quarter of 2020, EPA announced a reorganization of the Office of Chemical Safety and Pollution Prevention (OCSPP) whereby the Safer Choice branch was dissolved and most staff were reassigned to other areas of OCSPP. As a result, the program is now severely under-resourced with approximately four full-time staff. We urge you to fully restore the Safer Choice Program -- a broadly supported, and impactful recognition program that helps drive a market for safer chemicals and products.

Companies across the value chain utilize the Safer Choice brand to advance their individual safer chemical initiatives -- from brand owners to retailers to chemical manufacturers. For example, chemical manufacturers have invested in the difficult task of developing safer chemicals now listed on the Safer Choice's Safer Chemicals Ingredients List (SCIL). Having chemicals on the SCIL allows these manufacturers to offer best-in-class safer chemicals to the market that carry the robust third-party verification of the EPA. Brand owners and product manufacturers have invested in Safer Choice by undertaking the similarly resource-intensive effort to reformulate products using the SCIL to obtain Safer Choice certification. Major retailers specify the Safer Choice label as a way to verifiably meet corporate goals laid out in public-facing chemicals policies.

The Safer Choice Program also provides value to entities outside of the supply chain. Numerous states and municipalities rely on Safer Choice because it is the only third-party program that requires all ingredients to be screened for hazards instead of simply using a restricted

substances list. Several state and local governments specify Safer Choice labeled products in their purchasing contracts as well as point to Safer Choice in public education campaigns and outreach. Non-governmental organizations and consumers find significant value in an authoritative government program that can be trusted to vet safer chemicals and products.

We believe that the Safer Choice Program provides a unique space for product innovation while maintaining high standards for health, safety and functional use. Safe products that work are increasingly important as consumer awareness and concerns grow about the potential harm that many formulated consumer products can pose to their health and the environment.

We respectfully urge you to quickly restore the Safer Choice Branch and its staffing to their previous levels so that they may stabilize the program and serve the constituency they have worked hard to build over the last decade.

Sincerely yours,

American Cleaning Institute

Amway

Arylessence

BASF

Breast Cancer Prevention Partners

California Green Business Network

Canberra Corporation

ChemFORWARD

City of San Francisco Department of the Environment

Clean Control Corporation

Clorox Company

Cole Hardware

Cradle to Cradle Products Innovation Institute

CRC Industries, Inc.

Ecolab, Inc.

Environmental Center of San Luis Obispo

Environmental Council of the States

Environmental Defense Fund

EnviroStars

Firmenich Incorporated

GOJO Industries, Inc.
Green Business Partnership
Green Chemistry & Commerce Council (GC3)
Green Team Spirit
greenUP!
Hartz Mountain Corporation
Henkel
Household & Commercial Products Association
IFF
ISSA--the Worldwide Association for the Cleaning Industry
Levi Strauss & Co.
Lighthouse for the Blind and Visually Impaired
Massachusetts Toxics Use Reduction Institute
McFadden and Associates, LLC
Michigan Sustainable Business Forum
Minnesota Pollution Control Agency
Moore Environmental Programs
National Pollution Prevention Roundtable
National Retail Federation
Natural Resources Defense Council
Northwest Green Chemistry
Novozymes
Oregon Association of Clean Water Agencies
Oregon Department of Environmental Quality
Oxitenol
Procter & Gamble
PurposeBuilt Brands
RB (Reckitt Benckiser, LLC)
Safer Chemicals Healthy Families
San Benito County Integrated Waste Management Regional Agency
Scientific & Regulatory Consultants, Inc.
Sozio Fragrances

Spartan Chemical Company, Inc.
Starbrite
State Industrial Products
Stepan Company
Sunshine Makers, Inc. / Simple Green
Symrise, Inc.
ToxServices LLC
Washington State Department of Health
Olivia Bindon, Santa Barbara Green Business Program
Karl Bruskotter, Sustainable Procurement Advisor, City of Santa Monica
Larry Dunn, NTTC
Dwayne Fuhlhage, Sustainability Director PROSOCO
Raul Gonzalez, Executive Director, Pacific Northwest Pollution Prevention Resource Center
Alison Gutterman, CEO Jelmar, LLC
Tamsyn Hunnewell, Sustainable Works
Dr. Rebecca Spooner Korwin, Executive Vice President, Science and Innovation, State Industrial Products
Councilmember Lauren Kuby, City of Tempe, Arizona
Karen Neal Strobel, President, Strobel Professional Services LLC
Ivannia Perez, Sustainable Works
Heidi Winner, Santa Clara County Green Business Program
City of Tempe, Mayor - Corey Woods
Mike Yang, President, Creative Paint
Ken Zarker, Section Manager, Washington State Department of Ecology

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