



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

January 10, 2023

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue NW
Suite CC-5610 (Annex J)
Washington, DC 20580
Via Electronic Mail

Subject: Request for Extension of Comment Period; Green Guides Review, Matter No. P954501; Docket No. FTC-2022-0077; 87 *Federal Register* 77766 (December 20, 2022)

The Household & Commercial Products Association¹ (HCPA) appreciates the opportunity to provide comments on the Federal Trade Commission's (FTC's) solicitation of public comments on the Guides for the Use of Environmental Marketing Claims ("Green Guides"). HCPA is diligently developing comments on behalf of our diverse membership to provide FTC with a meaningful and thoughtful response to its request for public comment. This is a time-intensive process and additional time is necessary. FTC's request for comment is broad in the number of topics on which FTC seeks input. Further, the revised Green Guides will have tremendous influence on business-critical decisions for countless manufacturers and public policy measures aimed at protecting consumers. Moreover, the pre-holiday publication of the request for public comment eliminated valuable time necessary for the association to collect information from member companies critical to the formation of our response to FTC. Accordingly, HCPA respectfully requests a 60-day extension.

HCPA firmly believes that the Green Guides has and will continue to benefit consumers and industry. Marketplaces and product innovation have evolved since the latest update and the Guides' forthcoming revisions must reflect developments in product marketing, science and technology, and consumer perception.

Thank you for your consideration of this request. If you have any questions, please contact me at ngeorges@thehcpa.org.

Respectfully submitted,

A handwritten signature in cursive script that reads "Nicholas Georges".

Nicholas B. Georges
Senior Vice President, Scientific & International Affairs

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.