



american cleaning institute®
for better living

October 22, 2013

The Honorable Debbie Stabenow
Chairwoman
Senate Committee on Agriculture,
Nutrition and Forestry
328A Russell Senate Office Building
Washington, DC 20510

The Honorable Thad Cochran
Ranking Member
Senate Committee on Agriculture,
Nutrition and Forestry
328A Russell Senate Office Building
Washington, DC 20510

The Honorable Frank Lucas
Chairman
House Committee on Agriculture
1301 Longworth House Office Building
Washington, DC 20515

The Honorable Collin Peterson
Ranking Member
House Committee on Agriculture
1305 Longworth Office Building
Washington, DC 20515

Dear Chairwoman Stabenow, Chairman Lucas, and Ranking Members Cochran and Peterson:

The American Cleaning Institute (ACI) is the trade association representing the \$30 billion U.S. cleaning products market. Our members include oleochemical producers; the formulators of soaps, detergents, and general cleaning products used in household, commercial, industrial and institutional settings; companies that supply ingredients and finished packaging for these products. ACI and its members are dedicated to improving health and the quality of life through sustainable cleaning products and practices. ACI's mission is to support the sustainability of the cleaning products industry through research, education, outreach and science-based advocacy and to assure free market access to the key raw materials for the industry. Since 1926, ACI has promoted health through personal hygiene and effective cleaning. More information about ACI can be found at www.cleaninginstitute.org.

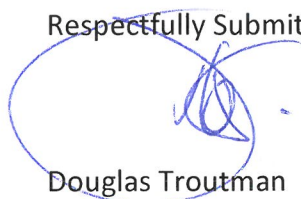
ACI is concerned with the definition of Renewable Chemical in S. 954, Agriculture Reform, Food, and Jobs Act of 2013. **We respectfully request that the definition of Renewable Chemical explicitly say that Animal Fats are ineligible for use as a feedstock.**

Historical users of oleochemicals already must cope with these raw materials being used for biomass-based diesel and renewable biodiesel via the Renewable Fuel Standard (RFS) and the blender's tax credit of \$1.00 per gallon. Unless animal fats are excluded from the farm bill's definition of a renewable chemical, this position will only be exasperated. All industries should work on a level playing field. The market should be the demand driver without distortion by regulations or law.

Animal fats (oleochemicals) have been wrongly included as a renewable feedstock. Livestock production is geared to food supply, not fuel and is thus inelastic and not renewable. Animal fats are a co-product of livestock slaughter, not a demand driver. Simply put, farmers and ranchers do not raise or slaughter animals for their fats. Because of this, animal fats are not a renewable feedstock and oleochemicals should not be included in any definition of renewable chemical.

Thank you for your attention and consideration of these comments. If you have additional questions, please contact Jacob Cassady, at (202) 662-2514 (direct dial) or via electronic mail at jcassady@cleaninginstitute.org.

Respectfully Submitted,



Douglas Troutman
Vice President & Counsel, Government Affairs

cc: Members of the 2013 Farm Bill Conference Committee