



September 28, 2006

Honorable Nancy A. Nord
Acting Chairman
Consumer Product Safety Commission
4330 East-West Highway
Bethesda, MD 20814-4408

Subject: Amendment of Federal Hazardous Substance Act Regulations to Implement the Globally Harmonized System (GHS) for Chemical Hazard Classification and Labeling for Consumer Products

Dear Acting Chairman Nord:

On October 25, 2005, The Soap and Detergent Association (SDA)¹ and the Consumer Specialty Products Association (CSPA)² met with then Chairman Hal Stratton to urge that the Consumer Product Safety Commission (CPSC) move toward efficient and timely implementation of the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) for consumer products. At that meeting, we urged the Commission to significantly elevate the priority of such an initiative. Most critical is the need to implement the risk-based labeling approach in the GHS for consumer products in the U.S. This approach would act as a prototype and could be used to promote its adoption in other areas of the world. Failure to do so in a timely manner could lead to adoption of an EU-style hazard-based labeling system by our trading partners with the U.S. consumer product labeling system being the exception. Therefore, it is important that the CPSC make every effort to implement the GHS by 2008, consistent with the U.S. support for implementation in various inter-governmental fora. The concerns of SDA and CSPA member companies on this matter were detailed in a letter to former Chairman Stratton dated July 15, 2005.

¹ The Soap and Detergent Association is the non-profit trade association representing over 110 manufacturers of household, industrial and institutional cleaning products; their ingredients; and finished packaging. SDA members produce more than 90% of the cleaning products marketed in the U.S. SDA is located at 1500 K Street, NW, Suite 300, Washington, DC 20005.

² The Consumer Specialty Products Association is a non-profit, U.S. trade association representing over 250 companies engaged in the manufacture, formulation, packaging, marketing, and distribution of consumer products for household, institutional and industrial (I&I) use. CSPA member companies' wide range of products include household pesticides, antimicrobial products, automotive specialty products, cleaning compounds, polishes and floor maintenance products, air care and aerosol products. CSPA is located at 900 17th Street, NW, Suite 300, Washington, DC 20006.

The opportunity to achieve critical goals of the GHS -- enhanced consumer protection and facilitated trade in chemicals -- and, therefore, greater access to safer consumer products around the globe, are being jeopardized as trading partners advance toward implementation of the GHS for consumer products with minimum dialogue with the United States. The timing for CPSC's efforts is critical, since major trading partners have begun to issue proposed implementing regulations, most recently the EU. The result could be trade barriers with serious economic impacts on the U.S. economy. Importantly, a rapid implementation of GHS for consumer products in the United States would also establish U.S. leadership in promoting the implementation of a practical and effective GHS around the world for this sector.

SDA and CSPA addressed these and other recommendations in a letter dated July 15, 2006 to Chairman Stratton, which is attached for your convenience.

At our meeting with Chairman Stratton, he recommended that SDA and CSPA assist the Commission by developing proposed amendments to the Federal Hazardous Substances Act regulations implementing the GHS. Enclosed herewith are those regulations in which SDA and CSPA have inserted proposed amendments. We offer these to the Commission as a starting point which will hopefully expedite implementation of the GHS elements relevant to U.S. consumer product regulations.

We request a meeting as soon as possible to discuss these proposed amendments and how we could help the Commission proceed through a regulatory development process, ultimately achieving adoption of GHS-related amendments.

SDA and CSPA remain committed to the process for harmonizing chemical hazard classification and labeling and the development of quality systems. The two organizations and their member companies will continue to bring to bear their resources to ensure that the GHS is fully implemented.

To respond to this letter or if you have any questions, please contact Richard Sedlak of SDA at 202-662-2523 or Robert Kiefer of CSPA at 202-833-7308.

Sincerely,



President
The Soap and Detergent Association



President
Consumer Specialty Products Association

Acting Chairman Nancy A. Nord
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cc: Lowell Martin, Deputy Executive Director, CPSC
Joseph Mohorovic, Director, Office of International Programs and Intergovernmental
Affairs, CPSC
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Richard Sedlak, Senior Vice President, Technical & International Affairs, SDA
Robert Kiefer, Director, Scientific & International Affairs, CSPA