January 20, 2021

VIA ELECTRONIC MAIL

Honorable Joseph R. Biden, Jr.
President
The White House
1600 Pennsylvania Avenue, NW
Washington, D.C. 20500

Dear Mr. President,

On behalf of the American Cleaning Institute (ACI), I am writing to congratulate you on your inauguration. Below you will find some top priorities for the cleaning product supply chain to help ensure and enhance the availability of critical products and chemistries for the American people.

**Public Health**

ACI member companies have increased production and are operating around the clock to produce vital products to protect individuals from the spread of COVID-19 and to meet the dramatic expansion in demand. The ACI goal remains to ensure delivery of finished cleaning, sanitizing and disinfecting products critical to combating the novel coronavirus to market and increasing the supply of ingredients to accomplish this goal.

Our members have embraced guidance from the Centers for Disease Control and Prevention (CDC) and multiple governmental authorities to undertake social distancing, enable telework and practice good hygiene. ACI encourages the continued public health guidance of the CDC nationwide. Because the business of cleaning product chemistry is so fundamental to our nation’s economy and to the continued operation of multiple other sectors, the U.S. Department of Homeland Security has classified the Chemical Sector (of which the cleaning product industry is a key component) as a Critical Infrastructure Sector.

**U.S. Environmental Protection Agency (EPA)**

The continued overall chemical management work at the EPA should be a priority in your Administration. ACI is the cleaning product industry leader for issues of disinfectant active ingredients such as quaternary ammonium compounds (QACs). ACI recognizes the importance and safe use of disinfectants to combat the novel coronavirus. ACI has engaged in a special focus on educating the public on how to find products that are effective on the novel coronavirus such as those on EPA’s List N, and how to use such products in a safe way. As a matter, ACI urges continued funding and attention to a robust Toxic Substances Control Act (TSCA) implementation and chemical management processes to ensure speed to market of important cleaning product chemistries.

**U.S. Food and Drug Administration (FDA)**

ACI is leading industry efforts to address FDA’s safety and efficacy data requirements in the final OTC Topical Antiseptic Monographs for Health Care, Consumer Wash and Consumer Rub products. These regulations have
significantly impacted currently marketed health care and consumer topical antiseptic products by establishing testing requirements for active ingredients to support determinations of their safety and efficacy which are greatly burdening product manufacturers. ACI provides the industry-leading forum for manufacturers and suppliers to work together to meet these testing demands.

The FDA has finalized rules for consumer antiseptic soaps and body washes (September 2016); health care antiseptic products (December 2017); and consumer rub or leave-on antiseptic products (April 2019). ACI is providing testing for the following active ingredients: benzalkonium chloride (BAC), benzethonium chloride (BZT), chloroxylenol (PCMX), ethyl alcohol and povidone iodine (PVP-I). FDA issued deferrals from final rulemaking on these active ingredients based on updates demonstrating our progress towards meeting FDA’s safety and efficacy data requirements. ACI has developed and submitted to FDA detailed work plans to satisfy the agency’s data requirements for the safety and effectiveness of these ingredients. We urge the Agency to ensure the continued availability of highly sought after products with these deferred active ingredients to consumer healthcare and commercial audiences.

ACI notes the guidance allowing temporary formulators of much-needed alcohol-based hand sanitizers during the COVID-19 pandemic to address market shortages. However, we are alarmed by the reported poisoning and exposure incidents across the country. ACI urges continued market surveillance for products that do not conform to FDA’s temporary manufacturing and labeling guidance in order to maintain the safety of all consumers who use these products.

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As the nation’s leading association representing the cleaning products value chain, ACI and its members are dedicated to ensuring that consumers and customers have access to critical cleaning products. ACI is also committed to ensuring transparent communication about the ingredients in cleaning products that make them so effective. ACI serves the growth and innovation of the U.S. cleaning products industry by advancing the health and quality of life of people and protecting our planet. ACI achieves this through a continuous commitment to sound science and being a credible voice for the $60 billion cleaning products industry.

We appreciate your consideration of these issues during this challenging time. Please contact me or Douglas Troutman of the ACI team at dtroutman@cleaninginstitute.org if we can be of further assistance. ACI and its members look forward to working with you and members of your Administration.

Sincerely,

Melissa Hockstad
President & Chief Executive Officer