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**VIA ELECTRONIC MAIL**

March 26, 2020

Honorable Basil Seggos  
Commissioner  
New York State Department of Environmental Conservation  
625 Broadway  
Albany, NY 12233-1010

**RE: Cleansing Product Information Disclosure Program**

Dear Commissioner Seggos:

The American Cleaning Institute<sup>1</sup> (ACI) has, and will continue to be, an active stakeholder in the Department's efforts to amend and update New York's household cleansing product rules (6 NYCRR Part 659). Established in 1926, ACI is dedicated to advancing public understanding of the safety and benefits of cleaning products, and has invested significant resources working with its members to help the Department formulate ingredient disclosure rules that best meet consumer needs.

ACI is the leading voice for a single, national standard governing ingredient communication. Recent events show that at critical times, seemingly minor difference between state and local requirements for health care products, sanitizers and even general cleaners can have unintended adverse consequences. ACI is fully committed to supporting the Department's long-term efforts to develop and implement a workable, consumer focused communication program based on the best available science. ACI has demonstrated its commitment to this process by providing extensive input on the Department's proposals including its recent Best Management Practices.

ACI's members are currently at the center of critical response to the international Novel Coronavirus (COVID-19) pandemic. Cleaning product manufacturers are in a unique and important position to aid the fight against the COVID-19 pandemic. The Department's ideas and proposals involve detailed technical issues. These have far reaching implications for cleaning product formulators and manufacturers. Before New York puts forth any cleaning product ingredient disclosure program that would have the unintended effect of impeding innovation, or creating barriers for manufacturers to serve New Yorkers with a full range of the most effective cleaning products, we urge the Department to hear from ACI's members about the important lessons learned during the COVID-19 crisis.

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<sup>1</sup> The American Cleaning Institute® (ACI) is the Home of the U.S. Cleaning Products Industry™. 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 \$59 billion cleaning products industry.

ACI and our member companies, like the Department, have finite resources. ACI member companies and their technical experts and allied professionals are, at present and for the coming months, fully engaged in the fight against COVID-19. The immediate need and demand to provide advice, technical support, and product to governments and consumers around the world on cleaning and disinfecting options to fight COVID-19 is the priority. This unprecedented public health emergency is demanding the full attention of many of the same in-house specialists and industry experts who would otherwise engage in the review and evaluation of the Department's proposals. We expect members to continue to address COVID-19 issues even after the imminent public health emergency subsides.

Under the present remarkable and emergency circumstances, ACI and especially New York's cleaning product industry, which contributes \$2.9 billion in output and 22,113 jobs, call upon the Department to suspend further review of any household cleansing product ingredient disclosure rule requirements until at least 30 days beyond the expiration of Governor Andrew Cuomo's Executive Order 202 or the expiration of the *National Emergency Concerning the Novel Coronavirus Disease (COVID-19) Outbreak* (Proclamation 9994).

Please contact me at [dtroutman@cleaninginstitute.org](mailto:dtroutman@cleaninginstitute.org), or Jacob Cassady if you have further questions or to discuss these issues. Thank you for your attention to this request.

Respectfully,



Douglas M. Troutman  
General Counsel, Corporate Secretary &  
Senior Vice President, Government Affairs

cc: Melissa Hockstad  
President & Chief Executive Officer  
American Cleaning Institute

Jacob Cassady  
Director, Government Affairs  
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Edward McTiernan  
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Frank Nemeth  
Hill, Gosdeck, McGraw and Nemeth