



October 23, 2025

The Honorable John Curtis
U.S. Senate
502 Hart Senate Office Building
Washington, DC 20510

The Honorable Jeff Merkley
U.S. Senate
513 Hart Senate Office Building
Washington, DC 20510

The Honorable Shelley Moore Capito
U.S. Senate
170 Russell Senate Office Building
Washington, DC 20510

The Honorable Sheldon Whitehouse
U.S. Senate
530 Hart Senate Office Building
Washington, DC 20510

Dear Chairwoman Capito, Ranking Member Whitehouse, Chairman Curtis, and Ranking Member Merkley,

The American Cleaning Institute (ACI)ⁱ commends the Senate Environment and Public Works Committee, Subcommittee on Chemical Safety, Waste Management, Environmental Justice, and Regulatory Oversight, for convening today's hearing to highlight the beneficial use and regulation of chemicals.

ACI urges the committee to recognize the criticality of chemistry to the economy, and specifically how innovation in chemistry may result in the development of new supply chains and the creation of other related benefits for U.S. manufacturers and consumers. New chemical specialty products are but one application of innovative new chemistries, chemistries produced using improved manufacturing and processing techniques that reduce risk, exposure, and energy use. However, ACI members are experiencing considerable challenges with the U.S. Environmental Protection Agency's (EPA) ability to meet its statutory deadlines under the Toxic Substances Control Act (TSCA), namely, to review and make final determinations on new chemicals within 90 days. The protracted process discourages the introduction of new innovations in common consumer goods and those used in industrial and institutional settings, like cleaning products, which could otherwise deliver more value to U.S. consumers. The pro-consumer benefits include more efficient, healthier, and more eco-friendly products.

Additionally, ACI would like to elevate for the committee's consideration the adverse impact of Significant New Use Rules (SNURs) that restrict most chemical substances that do ultimately receive a determination by the EPA after a manufacturer submits a Pre-manufacture Notice (PMN) of a new chemistry for market use. Most new chemicals are regulated via SNURs, which often prohibit usage by downstream manufacturers with complex supply chains. EPA has taken this route as TSCA requires EPA to consider "reasonably foreseen" uses in new chemical reviews. The lack of a clear definition in the TSCA for the term "reasonably foreseen" has led EPA staff to take an overly conservative approach that focuses heavily on theoretical hazards instead of utilizing a risk-based approach that prioritizes the specific conditions of use provided by manufacturers about the intended use of new chemistries.

As the committee considers policies to improve U.S. chemical regulations, ACI recommends that it consider targeted changes to TSCA to ensure the EPA has the clarity necessary to review PMN submissions efficiently.

Doing so could deliver tangible benefits to the resilience of U.S. manufacturing supply chains that include new innovative chemistry ingredients.

On behalf of the entire cleaning products industry, we thank you for your leadership in supporting domestic chemical innovation, which is only made possible by robust and resilient supply chains. Chemical innovation forms the foundation of most products in society and is key to a growing, vibrant, and sustainable economy, including job creation. ACI stands ready to work with the committee and EPA staff to implement a chemical management process that improves our industry's supply chains, supports American innovation, and benefits U.S. consumers and international business competitiveness.

Sincerely,



Blake Nanney
Director, Government Affairs
BNanney@CleaningInstitute.org

¹ ACI represents the approximately \$60 billion U.S. cleaning product supply chain. ACI members include the manufacturers and 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; and chemical distributors. ACI serves the growth and innovation of the U.S. cleaning products industry by advancing people's health and quality of life and protecting our planet. ACI achieves this through a continuous commitment to sound science and being a credible voice for the cleaning products industry.