

February 5, 2021

Ms. Jane Nishida  
Acting Administrator  
US Environmental Protection Agency  
1200 Pennsylvania Ave, N.W.  
Washington, DC 20460  
*Via email at Nishida.Jane@epa.gov*

**RE: Restore Safer Choice Program**

Dear Acting Administrator Nishida:

We are writing to express our strong support for the Environmental Protection Agency (EPA) Safer Choice Program as well as our concern for its long-term viability. The signatories to this letter represent a unique and broad group of chemical manufacturers, brand owners, environmental non-governmental organizations, small businesses, states and municipalities. During the last four years, resources and leadership have been drained from this critical program. Despite requests to EPA from multiple organizations and the agency's assurance the Safer Choice program would continue to operate at the same level of service, we have observed that the opposite has occurred.

For most of its existence, this unique and valuable program was organized within its own branch, staffed with as many as 13 full-time employees, including a branch chief, toxicologists and chemists. In the last quarter of 2020, EPA announced a reorganization of the Office of Chemical Safety and Pollution Prevention (OCSPP) whereby the Safer Choice branch was dissolved and most staff were reassigned to other areas of OCSPP. As a result, the program is now severely under-resourced with approximately four full-time staff. We urge you to fully restore the Safer Choice Program -- a broadly supported, and impactful recognition program that helps drive a market for safer chemicals and products.

Companies across the value chain utilize the Safer Choice brand to advance their individual safer chemical initiatives -- from brand owners to retailers to chemical manufacturers. For example, chemical manufacturers have invested in the difficult task of developing safer chemicals now listed on the Safer Choice's Safer Chemicals Ingredients List (SCIL). Having chemicals on the SCIL allows these manufacturers to offer best-in-class safer chemicals to the market that carry the robust third-party verification of the EPA. Brand owners and product manufacturers have invested in Safer Choice by undertaking the similarly resource-intensive effort to reformulate products using the SCIL to obtain Safer Choice certification. Major retailers specify the Safer Choice label as a way to verifiably meet corporate goals laid out in public-facing chemicals policies.

The Safer Choice Program also provides value to entities outside of the supply chain. Numerous states and municipalities rely on Safer Choice because it is the only third-party program that requires all ingredients to be screened for hazards instead of simply using a restricted substances list. Several state and local governments specify Safer Choice labeled products in their purchasing contracts as well as point to Safer Choice in public education campaigns and outreach. Non-governmental organizations and consumers find significant value in an authoritative government program that can be trusted to vet safer chemicals and products.

We believe that the Safer Choice Program provides a unique space for product innovation while maintaining high standards for health, safety and functional use. Safe products that work are increasingly important as consumer awareness and concerns grow about the potential harm that many formulated consumer products can pose to their health and the environment.

We respectfully urge you to quickly restore the Safer Choice Branch and its staffing to their previous levels so that they may stabilize the program and serve the constituency they have worked hard to build over the last decade.

Sincerely yours,

Alison Gutterman, CEO Jelmar, LLC

Amanda Heier, President and CEO, Breast Cancer Prevention Partners

American Cleaning Institute

Arylessence

BASF

California Green Business Network

ChemFORWARD

Clean Control Corporation

Cole Hardware

Councilmember Lauren Kuby, City of Tempe, Arizona

Deborah O. Raphael, Director, City of San Francisco Department of the Environment

Dr. Rebecca Spooner Korwin, Executive Vice President, Science and Innovation, State Industrial Products

Dwayne Fuhlhage, Sustainability Director PROSOCO

Ecolab, Inc.

Environmental Center of San Luis Obispo

Environmental Council of the States

Environmental Defense Fund

Firmenich Incorporated

Frederico Marchiori, Head, Institutional Relations - Oxiteno

Green Chemistry & Commerce Council (GC3)

Hartz Mountain Corporation - Joe Conti

Heidi Winner, Santa Clara County Green Business Program

Henkel

ISSA--the Worldwide Association for the Cleaning Industry

Ivannia Perez, Sustainable Works

Jennifer Sass, Senior Scientist, Natural Resources Defense Council

Karen Neal Strobel, President, Strobel Professional Services LLC

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Massachusetts Toxics Use Reduction Institute  
Mike Yang, President, Creative Paint  
Minnesota Pollution Control Agency  
Moore Environmental Programs  
Karl Bruskotter, Sustainable Procurement Advisor, City of Santa Monica  
National Pollution Prevention Roundtable  
Novozymes  
Olivia Bindon, Santa Barbara Green Business Program  
Oregon Association of Clean Water Agencies  
Procter & Gamble  
Raul Gonzalez, Executive Director, Pacific Northwest Pollution Prevention Resource Center  
RB (Reckitt Benckiser, LLC)  
Rhonda Jones, CEO, Scientific & Regulatory Consultants, Inc.  
Richard Whitman, Director, Oregon Department of Environmental Quality  
Safer Chemicals Healthy Families  
San Benito County Integrated Waste Management Regional Agency  
Sandrine Cassidy, Board of the California Green Business Program, Program Lead Assessor  
Culver City Sustainable Business Certification Program, Irvine Green Business Program  
Spartan Chemical Company, Inc.  
State Industrial Products  
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Sunshine Makers, Inc. / Simple Green  
Tamsyn Hunnewell, Sustainable Works  
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