

AN OPEN LETTER TO GOVERNOR CUOMO

LET'S WORK TOGETHER TOWARD A SCIENCE-BASED SOLUTION THAT KEEPS HOMES AND WORKPLACES CLEAN AND HEALTHY

*To The Honorable
Andrew M. Cuomo
Governor of New York State*

The blame for Long Island's poor water quality lies with former industrial and military facilities that unfortunately leaked chemicals into the ground. That's a universally recognized fact. The cost of cleaning the contaminated water will run in the billions of dollars and this effort clearly deserves strong support from lawmakers, the private sector, non-governmental organizations (NGOs) and the public. In the face of this monumental challenge, the New York legislature has instead chosen to target the products that we all use to wash our hands, clean our dishes and wash our clothes.

The legislation in question bans 1,4-dioxane, a byproduct of the manufacturing process that can be found in minuscule amounts in some cleaning products, as well as cosmetics and personal care products. These products are an important part of our day that many people may take for granted, but this bill could change the way these integral and everyday products are made and could even prevent them from being available in New York.

Cleaning products are used everywhere... so why isn't this a problem everywhere? We truly recognize the severity of this issue and empathize with Long Island residents. But, the 1,4-dioxane residue from your laundry detergent isn't the cause of the situation on Long Island or the cause anywhere else. Most importantly, this bill will have no measurable benefit to groundwater and be of no help to Long Island's residents as the levels of 1,4-dioxane in products are already so low. Efforts should instead focus on addressing Long Island's specific water quality issues – the contamination caused by former industrial and military facilities, which is coincidentally the area's largest groundwater pollution source.

Now, only you, Governor Cuomo, can prevent the serious consequences of this legislation from rippling across the supply chain, which would surely threaten public health and not have any impact on the true goal of improved water quality.

Cleaning products, especially the ones that also disinfect, are essential to maintaining good hygiene and preventing the spread of disease and bacteria in our homes, hospitals, schools, restaurants, hotels and government offices. If this bill is signed into law, many of these products that are critical to public health and overall hygiene could be pulled off store shelves because the technology to further reduce levels is not always feasible.

Our industry prides itself on working in a bipartisan manner with legislators, NGOs and regulatory agencies at all levels of government to find responsible solutions. A recent example of this successful approach was in California, where the Cleaning Product Right to Know Act of 2017 was signed into law by then Governor Jerry Brown as a direct result of industry working in good faith with NGOs.

In a similar collaborative spirit, industry proposed a 10 parts per million (ppm) limit for 1,4-dioxane, which is in line with other regulations around the world. The level chosen by the legislature – one ppm – has absolutely no scientific justification. The 1,4-dioxane residue from the products used during daily household activities is already so small that when the water goes down the drain, the level of 1,4-dioxane in the discharge is lower than the one part per billion drinking water standard proposed by the New York Drinking Water Quality Council – and even lower by the time it reaches the water treatment facilities. This legislation would effectively hold these products to a tighter standard than drinking water.

As a major representative of the collective household and commercial cleaning product supply chain, we respectfully urge you to work collaboratively with us toward a responsible, science-based solution.

This well-intended but clearly misguided legislation is only directing attention away from the cleanup efforts that truly deserve immediate and widespread support.

Sincerely,



Stephen J. Caldeira
President & CEO



Innovative Products For **Home. Work. Life.**