



**Ernie Rosenberg**  
**President and Chief Executive Officer**

February 14, 2008

Dori Gilels  
Erin Thompson  
Women's Voices for the Earth  
P.O. Box 8743  
Missoula, MT 59807-8743

Dear Mses. Gilels and Thompson:

Thank you for your letter of January 25 expressing Women's Voices for the Earth's position on disclosure of ingredients in cleaning products. I am happy to provide you with our perspective on this issue.

The Soap and Detergent Association (SDA) is the trade association for the U.S. cleaning products industry. Our industry has a long-standing commitment to enhancement of human health and the quality of life through responsible formulation, production, and sale of cleaning products and ingredients.

Since 1926, SDA has focused on advancing public understanding of the safety (including safe use) and benefits of cleaning products. SDA and its members have worked hard to serve the public by developing and sharing science-based information about our products with the technical community, policy makers, child care and health professionals, educators, media and, of course, consumers.

SDA and its members are strongly committed to ensuring that product labels clearly and plainly communicate the most critical information for the consumer – the product's safety and usage information. Our members comply with Federal regulations that require ingredients that contribute substantially to a product's hazards to be stated on their product labels. We appreciate that some consumers would like to know more about the ingredients in our products.

As you know, there is legislation under consideration in California (SB 509) that addresses some of the issues raised by your and other organizations. As we told the bill's sponsor, Senator Joe Simitian, in public testimony, SDA is receptive to the goal of communicating with consumers about ingredients in its members' cleaning products.

SDA and its members have put considerable thought into how best to meet consumer needs and are pleased to share our general views to date.

We agree that a workable ingredient communication program should include actual ingredient chemical names while providing flexibility as to the naming system that is used for listing these ingredients.

While SB 509 requires ingredient disclosure on a website, we agree that listing of the ingredients on the product label as an alternative, or some combination of the two, should be options, given the wide range of product and packaging categories that would be covered. Manufacturers need to have the flexibility to select the media that would best allow information about safe and effective use to remain prominent on labels.

While a simple list of ingredients may not necessarily reveal the formula for a particular product, we firmly believe that any system for the disclosure of ingredients must be sensitive to the manufacturers' need to protect their proprietary information. The ability to protect such information is critical to fostering the kind of innovation which has been the hallmark of our industry – innovation that improves the safety, effectiveness and convenience provided by the products and reduces environmental impacts.

SDA and its counterparts at the Consumer Specialty Products Association (CSPA) have publicly committed to Senator Simitian on behalf of our members that we will work with him to develop a meaningful and effective approach to ingredient communication as the bill proceeds through the legislative process. And, because of our strong commitment to consumer education, we will work with many of our partners to help the public understand the system that is ultimately adopted.

As a demonstration of our willingness to work cooperatively on the bill, we have already discussed our thoughts and ideas conceptually, as described above, in meetings with several other non-governmental organizations.

SDA would invite you to join this dialogue as it develops. Please feel free to contact Michelle Radecki, SDA's General Counsel, at 202-347-2900 or at [mradecki@sdahq.org](mailto:mradecki@sdahq.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Ernie Rosenberg". The signature is fluid and cursive, with a large initial "E" and "R".

Ernie Rosenberg  
President & CEO