

Alliance of Nurses for Healthy Environments · American Lung Association in New York · Breast Cancer Fund · Capital Region Action Against Breast Cancer (CRAAB!) · Center for Health, Environment & Justice · Citizens for a Clean Environment, Inc. · Clean New York · Community Health and Environment Coalition · Earthjustice · Empire State Consumer Project · Environmental Advocates of New York · Environmental Justice Action Group of WNY · Grassroots Environmental Education · Great Lakes United · Huntington Breast Cancer Action Coalition, Inc. · Institute for a Sustainable Future · Learning Disabilities Association of New York State · Natural Resources Council of Maine · New York Committee for Occupational Safety and Health · New York Lawyers for the Public Interest · New York Public Interest Research Group · New York State United Teachers · OMB Watch · Prevention Is The Cure · Sierra Club · Sierra Club Atlantic Chapter · WE ACT · Women's Voices for the Earth

We commend the Department of Environmental Conservation for exercising its authority to require disclosure of ingredients in household cleansing products in accordance with existing law and regulations. We have the following simple recommendations for interpreting and implementing these regulations:

1. **Stand By Current Regulations.** Reaffirm the existing regulatory provisions in their entirety. Implementation can and should begin before the end of this year, without a staff-intensive and costly administrative process, if the existing regulations are not changed and the technical standards for compliance are explained in a DEC Guidance Document.
2. **Require Disclosure of All Ingredients.** The current regulations give the public the right to know all of the chemicals contained in cleansing products. Exceptions should not be made for fragrance, dyes, preservatives, or other similar product components. The DEC Commissioner should exercise his authority to request disclosure of trace ingredients.
3. **Require Disclosure by Product.** The public has a right to know what is in each specific product.
4. **Require Information about Contaminants.** Reports on the nature and extent of investigations and research should include both ingredients and contaminants that tend to form in a product over time.
5. **Offer One-Stop Shopping.** All information should be housed in one on-line location, so members of the public do not have to sift through multiple corporate websites. People should be able to do fairly direct comparisons of products – both within one manufacturer's product lines and among brands.
6. **Standardize Reports.** Information should be submitted on one standard form, to ensure that data disclosed is complete and comparable.