

Principles of the Chemical Users Coalition

The Chemical Users Coalition (“CUC”) is a group of companies who use chemicals in the production of a wide range of industrial, commercial and consumer products that are a vital part of the U.S. economy. The members of this coalition share common perspectives on environmental, health and safety policies that are drawn from their common experience of being users, rather than producers, of chemicals. These members also share a common vision about the importance of aligning technological innovation and environmental performance, two goals that can and must be made compatible if our society is to prosper in a sustainable way.

The perspective offered by CUC’s members is an important voice that should be heard by legislators and agency officials when formulating chemical management policy. This is particularly true since our membership is intentionally diverse, drawing from experience in business areas such as aerospace, consumer products, automobiles, electronics, infrastructure, energy, building products, national defense, information technology and finance.

CUC’s perspective on chemical management policy is guided by the following general principles:

- Health and environmental protection measures should be guided by the broadly accepted principles of risk assessment that weigh both the hazards of individual chemicals and the potential exposures to those chemicals presented by specific chemical uses, focusing on significant risks that may present the greatest threat to health and the environment.
- In the modern world, businesses operate in a global economy while facing chemical management policies that can differ significantly between political jurisdictions (e.g., national, state, local). Where feasible and consistent with sound risk assessment principles, governments should try to align standards and expectations across borders.
- Policy decisions on chemical management should be made in a transparent process that offers participation opportunities for all interested parties.
- Programs intended to screen new technology from a health and environmental perspective should focus on significant risks, through a process that is timely and efficient. Trade secret and other proprietary information should be maintained as confidential during this process where necessary to protect innovation.
- When information is needed to assess chemicals, requests should be directed to those parties in the best position to provide the information of interest, wherever that expertise exists in the supply chain.

- Risk management actions on chemicals should reflect the following strategies:
 - Where best practices or exposure limitations can adequately address a public risk, those approaches should be recognized, along with chemical substitution, as protective strategies for companies to pursue.
 - Chemical substitution is premised on the availability of effective, practical alternative technology that offers a better health and environmental profile.
 - Adequate time is allowed, in consideration of industry cycles of technology and capital, to allow chemical users to transition to replacement technologies.
 - Direct regulation of chemicals in articles is pursued only in a targeted manner under compelling circumstances and implemented in consideration of the unique patterns of use for such articles.
- The information on chemicals that government agencies have collected can have great value to downstream industries. Government agencies have a particular responsibility to make information that assists compliance with regulatory requirements accessible, not just available, through public information resources. In addition, agency information on the potential hazards and exposures associated with chemical uses can assist companies in providing employee protections and in pursuing product stewardship goals. It is useful for agencies to share this information where possible, pursuing strategies to disclose risk-relevant information while protecting appropriate trade secret and proprietary information as needed.