

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON D.C., 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

## August 14, 2006

Re: Important Change to EPA's Design for the Environment Formulator Program: Applications for partnership should include ingredient profiles

Dear DfE Formulator Program Current and Prospective Partners:

I am writing to let you know about changes we are making to our Design for the Environment (DfE) Formulator Recognition Program. At DfE, we greatly appreciate the level of interest and support we have received from our partners; your success at formulating safer products and your commitment to continuous improvement have made you change leaders in your industry. We are proud to be your partners in safer formulations.

For some time, unfortunately, prospective partners and current partners seeking to add products to their partnership have had to wait in a queue. We believe that long waits are not acceptable and that every company interested in partnership should be treated fairly. We are making programmatic changes, therefore, so that we can be responsive to all our partners, current and prospective.

Until now, an application for recognition needed to contain only a full, confidential disclosure of all formulation ingredients; based on this information, DfE developed "profiles" for all submitted chemicals. A profile is a compilation of all hazard information available on a chemical and includes detailed structure, physical-chemical properties, human health and environmental toxicology, and regulatory/administrative status. With the increased requests for partnership, we do not have sufficient resources for this work and so must now ask that, in addition to a confidential disclosure of ingredients, recognition applicants submit a chemical profile for each ingredient and that the profile be developed by a qualified third-party.

DfE believes that only a qualified third-party profiler has the skill and objectivity needed to ensure a quality review, with high confidence in the accuracy and reliability of the profile information. Third-party profiling is essential to ensuring that DfE recognition continues to be held in high regard.

To date, DfE has identified one organization, NSF International, that is capable of preparing chemical profiles. DfE will work, however, with any formulator and third-party reviewer interested in chemical profiling for DfE product recognition. NSF will begin accepting formulations for profiling on August 14<sup>th</sup>, 2006. For more information on NSF's profiling services, contact Teresa McGrath (tmcgrath@nsf.org, 651-493-4247). To preserve your place in the current DfE queue, you must contact NSF by September 25<sup>th</sup>, 2006.

Additionally, cleaning product formulators are encouraged to choose ingredients that are listed on <u>CleanGredients</u> and have passed the <u>DfE Screen</u>. These ingredients have already been reviewed by a third-party, and do not need additional review by a third-party profiler.

DfE will continue to carefully review all chemical profiles and make all product recognition decisions. DfE will also continue to list partners and recognized products on its website and allow use of the EPA DfE logo on recognized partnership products (under the terms of a signed partnership agreement).

If you have questions or would like more information, please contact Libby Sommer (<a href="mailto:sommer.elizabeth@epa.gov">sommer.elizabeth@epa.gov</a>, 202-564-1065) or me (<a href="mailto:diffiore.david@epa.gov">diffiore.david@epa.gov</a>). Thank you for your continued patience and understanding as we transition to a process that will better serve you.

Sincerely,
David DiFiore, Manager
DfE Formulator Recognition Program