



The Soap and Detergent Association

FACSIMILE TRANSMITTAL

| | | | |
|--------------------------|--|-------------------------------------|--------------------------|
| DATE: | March 16, 2009 | | |
| TO: | Mabel Echols | FAX #: | (202) 395-7245 |
| | Records Management Center, Room 10102 Office of Management and Budget | TEL #: | |
| FROM: | Ernie Rosenberg | | |
| RE: | | PAGES: | 4 (including Cover Page) |
| <input type="checkbox"/> | URGENT | <input checked="" type="checkbox"/> | For Review |
| <input type="checkbox"/> | | <input type="checkbox"/> | Please Comment |
| <input type="checkbox"/> | | <input type="checkbox"/> | Please Reply |

MESSAGE:

The Soap and Detergent Association comments in response to Federal Register Vol. 74, No. 37 – Office of Management and Budget, Federal Regulatory Review.

The enclosed will be:

Faxed only Also be mailed Also be sent overnight



The Soap and Detergent Association

March 16, 2009

Mr. Peter Orszag, Director
Office of Management and Budget
Executive Office of the President of the United States
New Executive Office Building
725 17th Street, N.W.
Washington, DC 20503

Re: Federal Regulatory Review

Dear Mr. Orszag:

On January 30, 2009, President Obama instructed the Director of the Office of Management and Budget (OMB) to produce recommendations for a new Executive Order on Federal regulatory review, and shortly thereafter, you invited comments on how to improve the process and principles governing regulations.

The Soap and Detergent Association (SDA) appreciates this opportunity to provide input into the regulatory development process. SDA is a one-hundred plus member trade association representing the \$30 billion U.S. cleaning products market. SDA members include the formulators of soaps, detergents, and general cleaning products used in household, commercial, industrial and institutional settings; companies that supply ingredients and finished packaging for these products; and oleochemical producers.

OMB sits in a unique position within the Executive Branch of the government which affords it the opportunity to provide strategic guidance and coordination to the activities of the agencies to serve the public in the most efficient manner and to assure that the use of regulatory resources focus on national priorities. As such, OMB's role in the Federal regulatory process should include a proactive function during regulatory development and an independent analytical function after regulations are drafted by an agency.

OMB should be involved in the early stages of development of major regulations at the strategic level in order to provide direction consistent with the desired goals of the underlying and related statutes, and to ensure consistency of regulations among Federal agencies. It should be noted that only OMB has the ability to coordinate among the disparate agencies which are themselves often answerable to Congressional committees that only minimally coordinate among themselves the mandates they give to and the demands they put on the regulatory agencies.

However, this is not a call for OMB to micromanage regulatory development, nor should OMB be expected to be knowledgeable in the particular policy areas of each agency. It should be in a position of testing assumptions, breaking down barriers between agencies.

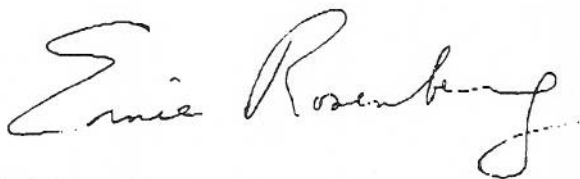
SDA Comments on Federal Regulatory Review

Page 3 of 3

reduce the need for animal testing while spawning a new domestic informatics-based industry. There is an opportunity for OMB to be a champion of such innovation for new approaches to assessing chemicals that have been validated according to national or international principles, which would provide benefits to all stakeholders. OMB could spur faster review and acceptance of alternatives to animal testing by providing increased resources for the Interagency Coordinating Committee for the Validation of Alternative Methods and prodding the use of alternative methods via careful application of the Data Quality Act.

SDA appreciates the opportunity to comment on the proposed recommendations. We support OMB's efforts to involve stakeholders throughout the regulatory development process and encourage you to continue with this transparent approach to developing recommendations for Federal Regulatory Review.

Sincerely,

A handwritten signature in cursive script that reads "Ernie Rosenberg". The signature is written in dark ink and is positioned above the typed name and title.

Ernie Rosenberg
President and CEO