

October 27, 2020

Ms. Susan Sharkey  
Chemical Control Division  
Office of Pollution Prevention and Toxics  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460-0001

Subject: Request for an Extension to the TSCA Chemical Data Reporting (CDR) 2020  
Submission Period

Dear Ms. Sharkey,

The Household & Commercial Products Association<sup>1</sup> (HCPA) requests a 60-day extension to the 2020 submission period for the Chemical Data Reporting (CDR) Rule (76 Fed. Reg. 50816, April 9, 2020) to January 31, 2021. HCPA members continue to be focused on manufacturing and distributing products, such as disinfectants and cleaning products, and the raw materials used to make these important products that are critical for the current COVID-19 pandemic. The pandemic has required the dedication of significant resources that would normally be compiling and developing the data for the Chemical Data Reporting and additional time is necessary to complete the submission. Companies are also reporting a number of significant issues with accessing and using the Chemical Data Exchange (CDX) system during the reporting period that has further impeded the process.

HCPA appreciates that EPA proactively extended the initial reporting deadline to familiarize themselves with the changes to the CDR reporting requirements but the scale of the pandemic and CDX issues have negated the benefit of the extension. A few of the examples of challenges report by member companies include:

- Employees continue to work remotely (or alternating shifts) which can decrease the effectiveness of sharing data and bandwidth slowing down access to internal databases
- Obtaining information to address the new co-manufacturing requirements of CDR is taking a significant time, especially when coupled with remote working.
- Obtaining information from other manufacturing partners, especially involving imports are constrained due to long-term shutdowns or disruptions.

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<sup>1</sup> The Household & Commercial Products Association (HCPA) is the premier trade association representing companies that manufacture and sell \$180 billion annually of products used for cleaning, protecting, maintaining, and disinfecting homes and commercial environments. HCPA member companies employ 200,000 people in the U.S. whose work helps consumers and workers to create cleaner, healthier and more productive lives.

- Batch submissions to CDX remain problematic and unresolved.
- On or about September 29, 2020, the entire CDX system crashed for approximately two weeks and precluded any submissions. While members now report that the CDX system is functional, it continues to be slow and unreliable. This is further compounded by remote/alternating work situations.
- Inconsistencies between statutorily allowed Confidential Business Information (CBI) substantiation and ability to designate as such in the CDX portal.

HCPA urges EPA to extend the CDR submission deadline by 60 days based upon both pandemic-related resource constraints and on-going technical issues. If you have any questions or additional information, please contact me at [sbennett@thehcpa.org](mailto:sbennett@thehcpa.org).

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read 'Steven D. Bennett', with a long, sweeping horizontal line extending to the right.

Steven D. Bennett  
Senior Vice President, Scientific & Regulatory Affairs