



The Dow Chemical Company
Midland, MI 48674
U.S.A.

July 28, 2014

Nick Abraham
Legislative Clerk
Committee on Energy and Commerce
House of Representatives
Congress of the United States
2125 Rayburn House Office Building
Washington, DC 20515-6115

Dear Mr. Abraham:

This letter is in response to the letter from The Honorable John Shimkus dated July 15, 2014 where I was requested to respond to questions received from The Honorable Henry A. Waxman following the Subcommittee on Environment and the Economy's hearing on discussion draft entitled the "Chemicals in Commerce Act" on March 12, 2014. Attached is my response in the format requested.

Thank you for providing me with the opportunity to testify before the Subcommittee.

Regards,

Connie Deford
Director – Product Sustainability and Compliance

Attachment

Attachment

Dow Chemical Response to the Questions following March 12, 2014 Subcommittee Hearing on the discussion draft entitled the "Chemicals in Commerce Act"

(1) Questions from The Honorable Henry A. Waxman

(2) & (3) Questions and Response

1. Does Dow still support holding all existing chemicals in commerce to a safety standard?

Dow response: Dow supports a systematic approach to evaluating existing chemicals in active commerce against a safety standard. Under this framework, EPA should prioritize existing chemicals based on hazard, use and exposure information, and then assess high priority chemicals based on their safety under intended conditions of use.

2. Does Dow still support a safety standard that requires a chemical to be "safe for its intended conditions of use"?

Dow response: Dow supports a safety standard that addresses the potential hazards and potential exposures under the chemicals' intended conditions of use. For those uses of a substance found not to meet the safety standard, risk management measures should be applied.

3. Does Dow still support applying that safety standard as a minimum standard?

Dow response: Dow supports a safety standard for all chemicals in active commerce that addresses the potential hazards and potential exposures under the chemicals' intended conditions of use.

4. Should all existing chemicals be held to a safety standard that ensures they are safe for vulnerable populations?

Dow response: Dow supports a systemic approach to evaluating existing chemicals in active commerce whereby high priority chemicals should be assessed against a safety standard that would ensure that the chemical is safe under its intended conditions of use, including uses to which vulnerable populations may be exposed or hazards to which they may be particularly susceptible.

5. Should all new chemicals be held to a safety standard that ensures they are safe for vulnerable populations?

Dow response: Dow supports that new chemicals should be assessed against a safety standard that examines the potential hazards and potential exposures of the new chemical under its intended conditions of use, including exposures to vulnerable populations.

6. Should vulnerable populations be considered in priority decisions?

Dow response: Yes

7. Should risk management measures ensure that vulnerable populations are protected?

Dow response: Yes