March 10, 2023

Richard Revesz

Administrator Office of Information and Regulatory Affairs Office of Management and Budget The White House

Submitted via email to: [publicparticipation@omb.eop.gov](mailto:publicparticipation@omb.eop.gov)

Re: Comments on Broadening Public Engagement in the Federal Regulatory Process

Dear Mr. Revesz:

Fragrance Creators Association1 appreciates this opportunity to provide input on the summary of learnings and recommendations on broadening public engagement in the federal regulatory process (summary). We applaud the Office of Information and Regulatory Affairs (OIRA) for seeking this feedback.

Our comments address the first recommendation in the summary: “Help the public and agencies better understand the regulatory process and the role of OIRA, including identifying opportunities for engagement.” We support OIRA’s proposed recommendation that regulators “proactively disseminate relevant materials, especially through partnerships with community-based organizations, industry intermediaries (such as trade associations), and other institutions.” In addition, we are providing feedback on the fourth question posed: “How can intermediaries—such as trade associations or coalitions—be helpful in reaching individuals and small organizations or businesses, where have they been successful in doing so, and where might they be insufficient?”

Fragrance Creators’ membership is comprised of businesses of all sizes, ranging from small, family-owned companies to large multinational corporations. We represent the views of the entire fragrance value chain, including ingredient suppliers, fragrance manufacturers, and companies that market finished goods. As such, we are in the unique position of representing a membership that reflects the diverse perspective of the industry at-large. This, in turn, fosters innovation, promotes competition, and advances responsible growth of the marketplace.

*How can intermediaries—such as trade associations or coalitions—be helpful in reaching individuals and small organizations or businesses, where have they been successful in doing so, and where might they be insufficient?*

While Fragrance Creators represents the majority of the fragrance industry in the United States, approximately 75% of our member companies are small businesses under the Environmental Protection Agency’s most common definition of that term – i.e., having fewer than 500 employees. An even greater percentage would be considered small businesses under the Small Business Administration applicable NAICS codes, which are generally 1,000-1,250 employees. Our small business members are diverse, encompassing manufacturers (including importers), processors, and distributers.

At Fragrance Creators, we have a highly engaged membership. We regularly—at times, daily—deploy real-time updates and information, actively solicit feedback, ensure every voice is heard, and do the critical work of finding common ground and industry consensus. Importantly, we recently launched a Policy Insights Program2—leveraging technology and data—to stay ahead of policy and regulatory trends and help our industry be more proactive in our partnerships and ability to contribute in more thoughtful and effective ways.

Regarding any new rules or regulations, members emphasize: i) the importance of government providing adequate time and opportunity for engagement with all stakeholders, including industry; and ii) the need for clear and simple compliance guidance and a preference for communications to be provided both directly from an agency (by email) and through trade associations. Members appreciate opportunities to hear directly from regulators and ask questions, such as through meetings hosted by our association.

1 Fragrance Creators is the trade association representing the U.S. fragrance industry at large. The organization’s member companies create and manufacture fragrances and scents for home care, personal care, fine fragrance, and industrial and institutional products. Fragrance Creators also represents companies that market finished products containing fragrance, as well as those that supply fragrance ingredients, including natural extracts and other raw materials, that are used in perfumery and fragrance mixtures. More information about Fragrance Creators is available at [www.fragrancecreators.org](http://www.fragrancecreators.org).

2 https://www.fragrancecreators.org/fragrance-creators-launches-first-of-its-kind-data-insights-program-for-superior-forecasting-of-emerging-public-policy-regulatory-and-consumer-and-marketplace-trends