



February 8, 2016

Via [cyberframework@nist.gov](mailto:cyberframework@nist.gov)

Ms. Diane Honeycutt  
National Institute of Standards and Technology  
100 Bureau Drive (Stop 8930)  
Gaithersburg, MD 20899-8930

Re: ACC Comments- Views on the Framework for Improving Critical Infrastructure  
Cybersecurity

Dear Ms. Honeycutt:

The American Chemistry Council's (ACC) Chemical Information Technology Center (ChemITC) submits the following comments regarding the chemical sector's experience with the Cybersecurity Framework<sup>1</sup>. ChemITC supports the framework and its flexibility. The framework is complimentary to the voluntary Security Code included into ACC's Responsible Care® Program and other voluntary frameworks that have similar goals. ChemITC has actively promoted the joint industry-National Institute of Standards and Technology (NIST) cybersecurity framework (the framework) since it was released in 2014. The framework is backed by many industry sectors and does not need significant updating at this time.

ChemITC members are using the framework and urging business partners to also use the framework to better manage cybersecurity risks to their information networks and systems. Standards, guidance, and best practices relevant to cybersecurity are typically industry-driven and adopted on a voluntary basis; they are most effective when developed and recognized globally. Such an approach avoids burdening multinational enterprises with the requirements of multiple, and often conflicting, jurisdictions. ACC plays a leadership role in security policy development through our participation in the Chemical Sector Coordinating Council (CSCC). The CSCC is a vital voice by advising DHS and the President on matters of chemical security and emergency preparedness.

To augment existing programs within ACC, ChemITC recently prepared revised guidance to implement the cyber related activities under the ACC Security Code. The guidance, following the basic steps of the NIST framework, is designed for users to design a cyber protection plan

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<sup>1</sup> ACC represents the leading companies engaged in the business of chemistry. ACC members apply the science of chemistry to make innovative products and services that make people's lives better, healthier and safer. ACC is committed to improved environmental, health and safety performance through Responsible Care®, common sense advocacy designed to address major public policy issues, and health and environmental research and product testing. The business of chemistry is a \$770 billion enterprise and a key element of the nation's economy. Safety and security have always been primary concerns of ACC members, and they have intensified their efforts, working closely with government agencies to improve security and to defend against any threat to the nation's critical infrastructure.





unique to the company or facility, specifically implementing the overall framework. The guidance is mapped directly to the frameworks' specific steps.

To assist in the voluntary sharing of cyber threat information, ChemITC pilot tested in 2015 an Information Sharing and Analysis Center (ISAC) to facilitate the dissemination of cyber threat data between DHS and other government agencies, the chemical sector, and related industry sectors. The ISAC is scheduled to be fully operational in 2016.

ACC looks forward to continue working with NIST, the DHS, and others in implementing the framework for the chemical sector. Please contact me at (202) 249-6714 or [bill\\_gulledge@americanchemistry.com](mailto:bill_gulledge@americanchemistry.com) with any questions regarding this submittal.

Sincerely,

*Bill Gulledge*

Bill Gulledge  
Senior Director, Chemical Products & Technology  
Division  
Manager, ChemITC Program

