



November 2, 2023

Via: cyberframework@nist.gov

Ms. Cherilyn Pascoe
National Institute of Standards and Technology
100 Bureau Drive (Stop 2000)
Gaithersburg, MD 20899

Re: ACC Comments- NIST Cybersecurity Framework 2.0

Dear Ms. Pascoe:

The American Chemistry Council's (ACC) Chemical Information Technology Center (ChemITC) submits the following comments regarding Cybersecurity Framework 2.0. ChemITC supports the framework and its continuing 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 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 accepted globally, and the proposed updates, especially the additions regarding governance and provisions related to the supply chain, generally represent enhancements to the original framework.

Our experience indicates that the framework is extremely useful. ChemITC members are using the framework and urging business partners to do the same to better manage cybersecurity risks to their information networks and systems. We believe any proposed enhancements to the framework are likely to encourage greater implementation across industry sectors and particularly within an industry supply chain. ACC maintains that major changes to the framework are not needed.

Standards, guidance, and best practices relevant to cybersecurity are typically industry-driven and adopted on a voluntary basis, and 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. The NIST framework continues to provide this kind of helpful global model to adopt.

ACC previously submitted comments on the proposed 2.0 revisions to the framework (see attached letter of April 25, 2022).





ACC looks forward to continuing working with NIST, DHS/CISA, and others in implementing the framework for the chemical sector. Please contact me at [REDACTED] with any questions regarding this submittal.

Sincerely,

Bill Gulledge

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

