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TSCA Reform Deadlines ¹	
Sept. 20, 2016	• Mercury: EPA must publish a list of the mercury compounds that are prohibited from export.
Dec. 20, 2016	 Risk Evaluations: EPA must ensure that risk evaluations are being conducted on 10 chemical substances drawn from the 2014 TSCA Work Plan. Small Business: EPA must review, and potentially revise, its standards for small businesses after consulting with the Small Business Administration. Congressional Report: EPA must submit a report to Congress regarding the Agency's capacity to carry out risk evaluations.
Apr. 1, 2017	 Mercury: EPA must publish an inventory of mercury supply, use, and trade in the U.S.
June 22, 2017	 Prioritization Screening: EPA must establish a risk-based screening process that includes criteria for designating chemical substances as high- or low- priority substances. Risk Evaluations: EPA must establish a process to conduct risk evaluations to determine whether a chemical substance presents an unreasonable risk of injury, without considering costs or other nonrisk factors; EPA must develop guidance for developing and submitting draft risk evaluations for consideration by the Agency. Inventory Reset: EPA must establish a notification and reporting process for "active chemicals" that have been manufactured or processed over the last 10 years to reset the TSCA Inventory. Science Advisory Committee: EPA must establish a Science Advisory Committee on Chemicals.
June 22, 2018	 General Policies, Procedures & Guidance: EPA must develop any policies, procedures, and guidance necessary to carry out the amendments to TSCA. Vertebrate Animal Testing: EPA must establish a plan to develop alternative test methods and strategies to reduce, refine, or replace vertebrate animal testing. Mercury: EPA must promulgate a rule requiring anyone that manufactures mercury or mercury-added products or otherwise intentionally uses mercury in a manufacturing process to periodically provide reports to EPA.

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June 22, 2019	 Risk Management: EPA must propose rules under section 6(a) with respect to chemical substances identified as persistent, bioaccumulative, and toxic from the 2014 TSCA Work Plan and with likely exposure to the general population. Inorganic Byproducts: EPA must propose a rule limiting the reporting requirements for recycled, reused, or reprocessed inorganic
Dec. 23, 2019	 Risk Evaluations: EPA must ensure that risk evaluations are being conducted on at least 20 high-priority substances and has designated at least 20 chemicals as low-priority substances.
	 Inorganic Byproducts: EPA must publish a final rule regarding recycled, reused, or reprocessed inorganic byproducts.
Jan. 1, 2020	• Mercury: The export of the following mercury compounds is prohibited: mercury (I) chloride or calomel; mercury (II) oxide; mercury (II) sulfate; mercury (II) nitrate; cinnabar or mercury sulphide; and any mercury compound added to the list by rule.
June 22, 2021	 General Policies, Procedures & Guidance: EPA must review the adequacy of its policies, procedures, and guidance. Vertebrate Animal Testing: EPA must submit a report to Congress regarding the Agency's progress in implementing the strategic plan in section 4(h)(2)(A) and goals for implementing alternative test methods and strategies. Mercury: EPA must submit a report to Congress regarding mercury exports.

¹ If a deadline falls on a weekend or holiday, the period continues to run until the next day that is not a weekend or holiday. For deadlines measured by days from enactment, timing is computed starting June 23, 2016.

Beveridge & Diamond's <u>Chemicals, Products & Nanotechnology</u> practice group provides strategic, businessfocused advice to the global chemicals industry. We work with large and small chemical companies from industries including basic and specialty chemicals, pharmaceuticals, electronics, crop protection, food contact materials and additives, and consumer products, and have substantial experience representing clients whose products and activities are subject to EPA's broad chemical regulatory authority under the Toxic Substances Control Act. For more information, please contact <u>Mark Duvall (mduvall@bdlaw.com</u>, 202.789.6090).