FROM THE CHAIR: REVIEWING OUR MISSION, SCOPE, AND BRAND

Charles L. Franklin

Call me biased, but the Pesticides, Chemical Regulation, and Right-to-Know (PCRRTK) Committee and its members have one of the most interesting and diverse mandates in the Section of Environment, Energy, and Resources (SEER). PCRRTK has always been home to well-recognized expertise on the Toxic Substances Control Act (TSCA), the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and the Emergency Preparedness and Community Right-to-Know Act, statutes critical, if underappreciated, for their role in protecting public health and the environment while encouraging domestic innovation and economic growth.

But today’s PCRRTK Committee covers many other cutting-edge and crosscutting issues relating not just to pesticides and chemical substances, but also to the wide variety of products and industries in which they are used. In recent years, the committee has sponsored programs or articles on TSCA reform; California’s Green Chemistry Regulation; the Federal Trade Commission’s revisions to its Green Marketing Guidelines; the continued tension between FIFRA and the Clean Water Act and Endangered Species Act; the developing market for greener, more sustainable commercial and consumer products; the tension between principles of the public’s right-to-know and intellectual property protections; evolving chemical control policy in the European Union and Asia, and the comparative regulatory worlds of consumer products, oil spill dispersants, and hydraulic fracturing fluids. This topic diversity is no accident—it is a direct result of the committee’s core focus: understanding the regulatory framework for the chemical substances that go into consumer, commercial, industrial, and agricultural products.

PCRRTK has traditionally been one of the Section’s smaller committees—a fact that provides motivated members with unusual opportunities for leadership and opportunities to interact with the leading experts in the chemical and pesticide bar. But don’t let that size fool you. We have been and will continue to be an active and ambitious leader in promoting scholarship, information exchange, and professional networking on issues within our traditional scope, and on the many intersections between pesticide and chemical law and policy and the larger SEER community.

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Past program materials and podcasts are available for purchase.
Canada announced on March 30, 2012, that it will initiate consultations with industry regarding voluntary reductions in the use of triclosan. This announcement follows issuance of the Ministry of Environment and the Ministry of Health’s Preliminary Assessment for Triclosan under the Canadian Environmental Protection and Pest Control Products Acts. The risk assessment was conducted as part of the ministries’ Chemical Management Plan. While the assessment confirmed that triclosan use in personal care products presents no human health risks, the ministries found that environmental effects warrant reconsideration of the chemical as a materials preservative. In contrast, the U.S. Environmental Protection Agency’s (EPA’s) 2010 reregistration evaluation decision imposed only environmental modeling requirements on registrants. The Preliminary Assessment reported that 1600 personal care products containing triclosan were in commerce in 2011. In these products, triclosan acts as a non-medicinal materials preservative. Triclosan reportedly is also an active medicinal ingredient in 130 personal care products. These products are regulated by Health Canada as drug products. In these products, triclosan is intended to control oral and dermal microorganisms. In addition, triclosan is registered as an active ingredient in six pest control products for use as a materials preservative in textiles, plastic, paper, leather, and rubber materials. Environment Canada reports that approximately 54,000 kg of triclosan were imported into Canada in 2000. No manufacture was reported by the 2000 Domestic Substance List Survey.

Canada’s Chemicals Management Plan includes provisions for risk assessment and use restrictions of potentially harmful chemicals. Implementation of the plan also accelerated re-evaluation of older pesticides. In addition, the Canadian Environmental Protection Act mandates screening assessments where evidence suggests a substance may be persistent, bioaccumulative, or inherently toxic, either to human health or the environment.

The Preliminary Assessment found triclosan entering the environment in quantities, concentrations, and under conditions that may have immediate and long-term adverse effects on the environment and its biological diversity. For example, triclosan is believed to bioaccumulate in fish, algae, and invertebrates. Triclosan is released to the environment via wastewater systems. Triclosan concentrations in wastewater treatment system influents have been measured from 100 to 3600 ng/L. Triclosan in personal care products is found in household wastewater, as is leachate from textiles and plastics treated with triclosan. Additionally, triclosan is present in the wastewater treatment sludge used as an agricultural soil amendment. The Preliminary Assessment found that this application also releases triclosan to the environment. Current data on industrial processes involving triclosan and their wastewaters were not available to the Preliminary Assessment.

The Preliminary Assessment reports that uncertainties about industrial uses and potential alternatives for triclosan must be addressed before the ministries determine appropriate risk management measures. The agencies have invited industry to submit information on industrial uses and releases of triclosan. Requested data are:

- **Industrial Use Data**
  - Expected future trends in triclosan import/manufacture/use quantities and use patterns;
  - Potential alternatives for triclosan in various products; and
  - Information on issues associated with potential alternatives.

- **Industrial Release Data**
  - Transportation and handling practices;
  - Product formulation processes; and
  - Practices for managing industrial releases.

Because triclosan, in some applications, has demonstrated health benefits, the ministries intend to allow continued use of the substance where necessary for health protection, while implementing risk management measures to mitigate environmental risks. Intermediary risk management activities will include consultation with stakeholders on the potential for voluntary reduction in the use of triclosan in consumer products.
The registrants of triclosan pesticide products have indicated their intention to discontinue the registration of their products. After December 31, 2014, triclosan will no longer be permitted for use as a pesticide in Canada and cannot be contained in any treated articles imported into Canada unless a new triclosan product is registered in Canada.

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THE ECONOMIC IMPACT OF NANOTECHNOLOGY REQUIRES BETTER ASSESSMENT AROUND THE WORLD

Anne S. Kim

International leaders in nanotechnology gathered in Washington, D.C., to attend the International Symposium on Assessing the Economic Impact of Nanotechnology March 27–28, 2012. The symposium was a collaborative effort sponsored by the National Nanotechnology Initiative (NNI) and Organisation for Economic Co-operation and Development (OECD) and hosted by the American Association for the Advancement of Science (AAAS). The objective was to “systematically explore the need for and development of a methodology to assess the economic impact of nanotechnology across whole economies, factoring in many sectors and types of impact, including new and replacement products and materials, markets for raw materials, intermediate and final goods, and employment and other economic impacts.”

Over the course of two days, individuals from various sectors discussed, evaluated, and learned about international developments in nanotechnology. Four background papers provided the basis for the discussions and breakout sessions focused on: Transportation and Aerospace; Nanomedicine; Electronics; Energy; Advanced Materials; and Food and Food Packaging. Legal barriers to economic development of nanotechnology discussed in the sessions include intellectual property rights, limited regulation, and lack of domestic and international agency coordination. In the United States, a lack of guidance documents and regulations from NNI agencies poses serious problems for international economic competition and economic assessment. Similarly, other OECD countries have difficulty establishing standards that adequately regulate and monitor nanotechnology. Presentations by six different governments—the United States, Brazil, South Africa, the European Union, India, and Japan—showed vastly different stages of regulation.

Mindful that private capital surpassed public spending in nanotechnology research and development in 2010, the need to establish better metrics and methodologies took center stage in all the discussions. Since private investments signal the potential for significant returns on investment, discussions also focused on commercialization of the various nanoproducts. Synthesis of the breakout sessions revealed the need to set better standards, gather data, set priorities, and provide guidance documents. Because most data collection is focused on surveying and assessing rather than applied studies, more needs to be done to identify economic factors. To raise international political support, many agreed nanotechnology must show that the investments are producing practical benefits that include economic gain. Furthermore, at a time when more industries are investing in sustainable or environmentally friendly practices, investments in green nanotechnology show only modest benefits.

The symposium provided a forum for industry representatives, interested persons, and government officials to engage in a conversation focused on the economic impacts of nanotechnology. It recognized the numerous achievements realized thus far, but emphasized the need to provide better assessment of economic impacts by using new or additional tools. It is unclear what the necessary tools are, but the heightened awareness may provide the activation energy necessary to revisit and revise established methodologies.

For more information or to view background papers and presentations, please visit www.nano.gov/symposium.

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EPA ANNOUNCES DATA COMPENSATION OBLIGATIONS AND TOLERANCE REVOCATIONS FOR PESTICIDE INERT INGREDIENTS

John D. Conner Jr. and Peter L. Gray

Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) data compensation for inert ingredient data submissions is the Loch Ness monster of the pesticide legal world: we’ve heard about it for years, but nobody has actually seen it. Based on the U.S. Environmental Protection Agency’s (EPA’s) March 14, 2012, Federal Register notice, that may soon change.

In 2010, EPA issued test orders under its Endocrine Disruptor Screening Program (EDSP) to manufacturers of the following nine “high production volume” chemicals used as pesticide inert ingredients: acetone, isophorone, di-sec-octyl phthalate, toluene, methyl ethyl ketone (MEK), butyl benzyl phthalate, dibutyl phthalate, diethyl phthalate, and dimethyl phthalate. In its March 14, 2012, notice, EPA explains how it will enforce data compensation rights of two consortia that agreed to run the 11 screening assays for two of the nine inerts (acetone and isophorone). EPA also stated its intent to remove from its list of approved inerts five of the unsupported inerts (MEK, butyl benzyl phthalate, dibutyl phthalate, diethyl phthalate, and dimethyl phthalate). It will remove the five from its list of approved inerts six months after the date EPA publishes a final rule revoking the tolerances for diethyl phthalate and MEK (see below). It is EPA’s position that manufacturers and importers that did not commit to generating EDSP Tier I screening assays were obliged to stop all sales and distributions of the chemicals for the pesticide market as of July 28, 2010.

A registrant’s confidential statement of formula (CSF) must identify the source of each active and inert ingredient in its pesticide product. EPA’s notice advises that if a CSF lists a source of isophorone or acetone other than a consortia member, EPA will require the registrant to take one of the following actions: (1) change its source to a consortia member; (2) submit proof of an offer to pay (OTP) to the consortia; (3) submit a commitment to generate the required data; (4) reformulate its formulation (presumably using another approved inert and for which there is an exemption from tolerance if a food use); or (5) cancel the registration.

EPA’s Proposed Revocation of Tolerance Exemptions for Diethyl Phthalate and MEK

Of the five unsupported inerts, EPA previously established exemptions from tolerances for two: MEK (40 C.F.R. § 180.920) (inert ingredients used preharvest) and diethyl phthalate (40 C.F.R. § 180.930) (inert ingredients applied to animals). Because no manufac-
turer or importer committed to generating the Tier I EDSP screening assays for these two inerts, in a second March 14, 2012, Federal Register notice, EPA proposes to revoke their exemptions from the requirement of a tolerance, in accordance with FFDCA § 408(e)(1)(B). The revocations will become effective six months after the final revocation rule is published in the Federal Register.

The agency’s proposed rule “offers a final opportunity for any interested party to commit to develop these [EDSP] data” and cautions that if a party intends to object to a final revocation rule pursuant to FFDCA § 408(g), the party must raise those issues in its comments on the proposal. EPA warned that it “will treat as waived any issues raised in objections that could reasonably have been, but were not, presented in comments on this proposal.”

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### EPA RELEASES LONG-AWAITED REANALYSIS OF DIOXIN HEALTH RISKS

Lisa Lowry

On February 17, 2012, the U.S. Environmental Protection Agency (EPA) released the first of two reports, Reanalysis of Key Issues Related to Dioxin Toxicity and Response to NAS Comments Volume 1 (2012), available at http://www.epa.gov/iris/supdocs/1024index.html (Reanalysis Volume 1), which responds to the National Academy of Science’s recommendations and comments on the 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD) dose-response assessment in its 2003 draft reassessment. The release of Reanalysis Volume 1 marks the beginning of the end of years of research into the potential health risks of dioxins and dioxin-like compounds. EPA and other organizations, including the World Health Organization (WHO), have studied the potential risks to human health from exposure to TCDD for decades. EPA released its initial assessment of the risks related to human exposure to dioxins in 1985 and started its reassessment of the health risks of human exposure to TCDD in 1991, of which volumes 1 and 2 are the final product.

Dioxins are a family of toxic chemicals with similar structures and similar mechanisms for producing harm. The more notable dioxins fall into three closely related families: polychlorinated dibenzo-dioxins (PCDD), polychlorinated dibenzo furans (PCDF), and certain polychlorinated biphenyls (PCB). One of the most studied—and most toxic—dioxins is TCDD. Of about 419 types of dioxin-related compounds, about 30 compounds are considered to have significant toxicity. These compounds are one of the “dirty dozen” dangerous chemicals known as persistent organic pollutants. Dioxins and dioxin-like compounds are released into the air as a result of combustion processes, such as waste incineration or burning of fuels like wood, coal, or oil. Dioxins are also produced as unwanted byproducts of various manufacturing processes, including chemical manufacturing and metal processing. Individual activities, such as burning of household waste, also contribute to dioxin emissions. While the majority of dioxins are released as products of industrial processes, some dioxins are produced from natural sources, such as volcanic eruptions and forest fires.

Dioxins are stable and generally resistant to degradation, and are primarily deposited through atmospheric transport and deposition, and found in practically all environmental media throughout the world. Dioxin-like compounds have environmental half-lives ranging from years to several decades. These dioxins and dioxin-like compounds enter the ecological food chains and human diet through air-to-plant-to-animal and water-and-sediment-to-fish pathways (Reanalysis Volume 1, supra; WHO, Dioxins and Their Effects on Human Health: Fact Sheet (2010), available at http://www.who.int/mediacentre/factsheets/fs225/en/).

Consumption of foods containing dioxins and dioxin-like compounds now represents 90 percent or more of human exposure (National Academy of Sciences, Health Risks from Dioxin and Related Compounds:
Evaluation of the EPA Reassessment 95 (2006), available at http://www.nap.edu/catalog.php?record_id=11688). Dioxins and dioxin-like compounds accumulate in the fatty tissues of animals and humans because of their hydrophobic nature and resistance to metabolism and concentrate up the food chain. Short-term exposure to high levels of dioxins may cause skin lesions, such as chloracne and patchy darkening of the skin, and altered liver function. Long-term exposure to dioxins may impair the immune system, developing nervous system, endocrine system, and reproductive functions. The WHO’s International Agency for Research on Cancer classified TCDD as a “known human carcinogen.” Developing fetuses and newborns are most vulnerable to dioxin exposure because their organ systems are still developing (WHO, Dioxins and Their Effects on Human Health, supra).

As a result of source-specific regulations, improvements in source technology, advancements in pollution control technologies, and industry actions to reduce or prevent dioxin releases, concentrations of TCDD, dioxin, and dioxin-like compounds in food and environmental media have been declining over the last three decades. EPA set emission limits for dioxins under the Clean Air Act based on maximum achievable control technology, and dioxin releases to water under the Clean Water Act by requiring ambient water quality standards for TCDD. EPA also established a maximum contaminant level for TCDD under the Safe Drinking Water Act and focuses on cleanup of dioxin-contaminated sites through the Resource Conservation and Recovery Act and Superfund corrective action programs (EPA Information Sheet 4, available at http://cfpub.epa.gov/ncea/cfm_recordisplay.cfm?deid=87843; National Academy of Sciences, Health Risks from Dioxin and Related Compounds, supra).

EPA concluded, and so stated in its press release announcing the release of the report, that “generally, over a person’s lifetime, current exposure to dioxins does not pose a significant health risk” (EPA, EPA Updates Science Assessment for Dioxins/Air Emissions of Dioxins Have Decreased by 90 Percent Since the 1980s, News Release (Feb. 17, 2012)).

Nevertheless, Reanalysis Volume 1 publishes study selection criteria and results for noncancer and cancer TCDD dose-response assessments and chooses a noncancer reference dose of 0.7 picograms per kilogram of body weight per day for TCDD. Reanalysis Volume 2 will select a cancer reference dose for TCDD, but EPA has provided no timeline for the release of volume 2. Both Reanalyses focus on TCDD. As the most toxic of the dioxin family, TCDD is used as the index by which toxicities of other dioxins and dioxin-like compounds are measured and EPA uses the dose-response information for TCDD to evaluate risks from exposure to mixtures of dioxin-like compounds (Reanalysis Volume 1, supra).

The 0.7 picogram per kilogram of body weight per day exposure limit is below EPA’s estimated average dioxin intake for Americans of about 0.8 picograms per kilogram of body weight per day. Yet, neither the Food and Drug Administration nor the Department of Agriculture plans to regulate dioxins in food (Bill Tomson, EPA Updates Health Risks of Dioxins, WALL ST. J. (Feb. 2012)).

Lisa Lowry is a second year student at Georgetown University Law Center.
EPA RELEASES PROPOSED SNURS AND TEST RULE

Lynn L. Bergeson

The U.S. Environmental Protection Agency (EPA) released on March 20, 2012, proposed significant new use rules (SNUR) that would require companies to report all new uses of five groups of chemicals, including in domestic and imported products and articles, to give EPA the opportunity, if warranted, to prohibit or limit the activity. The chemicals, which were part of the existing chemical action plans that EPA released in 2009 through 2011, are polybrominated diphenylethers (PBDE), hexabromocyclododecane (HBCD), benzidine dyes, short-chain chlorinated paraffins (SCCP), and di-n-pentyl phthalate (DnPP). EPA is also proposing additional testing on the health and environmental effects of PBDEs. The proposed rules were signed March 20, 2012, and have been published in the Federal Register over a period of weeks in March and April. The proposal reflects EPA’s continuing use of existing Toxic Substances Control Act (TSCA) authorities to achieve the administration’s commitment to enhanced chemical management.

PBDEs

Under the proposed rule, EPA would amend the PBDE SNUR to designate processing of any combination of the six PBDE congeners contained in commercial pentabromodiphenyl ether (c-pentaBDE) or commercial octabromodiphenyl ether (c-octaBDE) for any use that is not ongoing as a significant new use. The proposed rule would also designate manufacturing, importing, or processing of decabromodiphenyl ether (decaBDE) for any use that is not ongoing after December 31, 2013, as a significant new use, and would designate the manufacture (including import) or processing of any article to which PBDEs had been added as a significant new use. Any person who intended to import a PBDE as part of an article for a significant new use would be subject to significant new use reporting. Ongoing uses would be excluded from the SNUR.

The proposed rule simultaneously proposes a TSCA section 4 test rule for c-pentaBDE, c-octaBDE, and commercial decabromodiphenyl ether (c-decaBDE). The test rule would require development of information EPA believes necessary to determine the effects of manufacturing, processing, or other activities involving these c-PBDEs on human health or the environment. EPA states that it intends to promulgate the test rule if it determines that manufacture (including import) or processing of c-PBDEs, including in articles, has not ceased by December 31, 2013.

HBCD

The proposed SNUR for HBCD would designate “use in consumer textiles, other than for use in motor vehicles” as a significant new use. Persons who intend to manufacture (including import) or process HBCD for use in covered consumer textiles would be required to notify EPA at least 90 days before commencing that activity. EPA states that the general SNUR article exemption for persons who import or process chemical substances as part of an article would not apply.

Benzidine Dyes, DnPP, and SCCPs

The proposed rule would add nine benzidine-based chemical substances to the SNUR at 40 C.F.R. section 721.1660 on benzidine-based chemical substances; create a SNUR for DnPP; and create a SNUR for alkanes, C_{12-23}, chloro. In the case of the benzidine-based chemical substances, EPA is also proposing to make inapplicable the exemption at 40 C.F.R. section 721.45(f) relating to persons that import or process chemical substances as part of an article. This would require persons who intend to import or process all listed benzidine-based chemical substances, i.e., the newly proposed nine benzidine-based chemical substances, as well as the currently listed benzidine-based chemical substances, as part of an article to notify EPA at least 90 days before commencing that activity. EPA also proposed a SNUR for alkanes, C_{12-23}, chloro, one type of SCCP. Under the SNUR, EPA would designate as a significant new use any use of this chemical substance.

Observations

These proposals represent important steps by EPA to act on several of its action plan commitments. Several of the SNURs are groundbreaking in their inclusion of
processing as a significant new use (e.g., the PBDEs) and their inclusion of manufactured articles wherein EPA is proposing not to apply the exemption of articles that otherwise applies by default to SNURs. These proposed rules represent an important body of work that will need close scrutiny by affected entities.

The proposal is noteworthy for another reason. With respect to the PBDEs SNUR, even when EPA is aware of some ongoing uses of decaBDE (e.g., in “military and aeronautical uses”), EPA has chosen not to exclude those uses from the proposed SNUR’s coverage in the regulatory text: the proposed SNUR trigger for decaBDE is “[m]anufacture, importing, or processing for any use after December 31, 2013.” EPA places the burden on commenters to explain “the extent to which these uses will continue . . . and whether there are any other uses which will not be discontinued by December 31, 2013.” In discussing this aspect of the proposal, EPA asks for details on the ongoing uses and requests definitions of terms. This seems to suggest that EPA will narrowly define any ongoing uses based on the information provided in comments.

For the test rule on the PBDEs, EPA is relying on the “may present” finding. This means that EPA could proceed with the testing requirements even if the production volume does not meet the exposure-based policy’s trigger of one million pounds. This approach may increase the likelihood that a test rule action may be issued in final, depending on the ongoing production and processing of the PBDEs, particularly decaBDE. In this regard, it is important to note that in preparing the proposal in final, EPA would still have to consider the economic affordability of the testing to be required.

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**Tree Planting Events**

The Section has undertaken a five-year project with the goal of planting a million trees by 2014. As part of that effort, the Section is sponsoring local tree plantings this spring in thirteen locations around the country. If you live in one of these cities, we strongly encourage you to get out and help with a project—have some fun as well as make a lasting and tangible contribution to your community. For details please visit www.ambar.org/EnvironTrees.

If you can’t plant a tree in person, please consider making a contribution to one of the Section’s partner tree organizations. The Section’s One Million Trees Project will get credit for one tree planted for every dollar donated through the Section website.

For current tree planting events or to make a donation to one of our project partners, please visit

www.ambar.org/EnvironTrees
TSCA REFORM AND PREEMPTION: A WALK ON THE THIRD RAIL

Charles L. Franklin

Over the last 30 months, an impressive array of public sector, private sector, and nongovernmental organizations (NGOs) have endorsed the need for federal chemical control and product safety reform. Most of this attention has focused on the 1976 Toxic Substances Control Act (TSCA), the nation’s primary (but hardly the only) statute regulating the manufacture, import, and use of chemicals in the United States. The White House has released “principles” for reform. Committees in the House and Senate have introduced bills, held hearings, and conducted stakeholder meetings on many key issues. Stakeholders from industry, the NGO community, and academia have conferred, written, and opined extensively on the substantive merit, and political likelihood of new chemical control legislation.

Yet, despite a robust debate and even occasional signs of stakeholder consensus on the need for reform/ modernization, the public discussion has largely shied away from the issue of preemption—i.e., whether a stronger federal statute would affect the need for, and role of, the many state-specific chemical control programs in place and under development. Indeed, if bashing the current federal chemical control statute has become fashionable, broaching federal preemption in the context of an updated statute has become taboo.

This reticence is unfortunate and, in the long term, counterproductive. Preemption is not a “yes or no” proposition—it is one of several constitutional principles, along with federalism, that policymakers must consider in developing workable environmental policies. Federal preemption can take different forms and be applied in varying degrees. In fact, given the technical complexity of the risks and the economic significance of regulatory action, a truly comprehensive chemical control law might need to incorporate multiple preemption standards to address different federal/state policy conflicts.

The preemption discussion is also important for a more pragmatic and political reason. One of the primary incentives for industry to support strengthened federal legislation is concern about the proliferation of state and local standards imposing disparate substantive, procedural, and legal obligations on retailers, manufacturers, and supply chains. Supporters argue that these state-level programs are a necessary response to TSCA’s failure to provide EPA with the authority it needs. Critics argue that the unfettered growth of state-specific labeling requirements and use restrictions undermines interstate commerce, reduces customer choice, encourages scientifically unsubstantiated blacklists, and creates public distrust in the safety of domestic products.

There are many different ways policymakers can resolve the tension between preemption and federalism—without undermining the traditional partnership between federal and state governments in protecting the public. The first step is to start the discussion.

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ABA SECTION OF ENVIRONMENT, ENERGY, AND RESOURCES

CALL FOR NOMINATIONS

2012 ABA AWARD FOR EXCELLENCE IN ENVIRONMENTAL, ENERGY, AND RESOURCES STEWARDSHIP

Nominees must be people, entities, or organizations that have made significant accomplishments or demonstrated recognized leadership in the areas of sustainable development, energy, environmental, or resources stewardship. This may include a major development in law or policy that serves to enhance conservation, responsible development, prudent resource use, and pollution abatement or mitigation, or it may be a recognition for a sustained period of leadership in the development of law and policy in this area. The Award may also be given for significant achievements in legal practice or in business; including corporate charitable contributions of funds, land, or resources; in written articles; in teaching; in advocacy before courts, agencies, legislators, or other institutions; or for any other significant achievement that evidences excellence in environmental, energy, and resources stewardship.

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This award will be presented at the 20th Section Fall Meeting in Austin in October 2012.

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