

THE COATINGS INDUSTRY PERSPECTIVE

Sound Science: The Pathway to Safer Technologies

The Issue

The U.S. Environmental Protection Agency's (EPA) implementation of the 2016 TSCA amendments have flawed regulatory practices, leading to unnecessary restrictions on existing chemicals and pronounced delays for new chemical reviews.*

These policies are driving companies to introduce the best innovative products in foreign markets, competitively disadvantaging the U.S. coatings industry, and preventing U.S. consumers from enjoying the most advanced and effective products.

** EPA approves new and existing chemicals through a process that is initiated by a Pre-Manufacture Notice (PMN). The original TSCA language required the PMN process to be completed in 90 days.*

The Impact

- Hundreds of technologically innovative products that would produce cost savings, increase safety and improve human health, not introduced to U.S. consumers.
- Increased compliance costs passed down to consumers.

Our Ask

EPA should be held to timely and scientifically sound standards for its new chemical reviews to do the following:

- **Implement case-by-case, science-based risk evaluations for new chemical reviews, appropriate to the condition of use.**
- **Provide transparent, consistent, and reliable processes for chemical evaluations that reflect pragmatic, real-world conditions.**
- **Focus evaluation on existing commercial uses while minimizing effects on downstream chemical users.**
- **Eliminate undue and burdensome recordkeeping, reporting, labeling and notification requirements.**

Pre-Manufacture Notice Process is a Regulatory Roadblock for New, Innovative Technologies

446

The Backlog of Current PMNs under Review

600

Average number of PMN's submitted annually prior to 2016 TSCA Amendments; **down to 125 filed in 2025**

2-3 Years

Average time it takes EPA to approve a PMN

Sources: U.S. EPA + American Chemistry Council

