

# Erik Baptist Discusses EPA's Approach to Revisiting Completed TSCA Risk Evaluations

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*Inside EPA's Inside TSCA*

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Erik C. Baptist, partner in Wiley's Environment & Product Regulation Practice, was quoted by *Inside EPA's Inside TSCA* in an April 15 article about the U.S. Environmental Protection Agency's (EPA) plan to continue its bifurcated approach to the TSCA risk evaluation process by revisiting parts of 10 chemical risk evaluations previously completed under the amended Toxic Substances Control Act (TSCA), while also proceeding with rules to manage unreasonable risks.

"The new Administration appears to be doubling down on this approach as it recently announced that it would seek targeted revisions to the completed first 10 risk evaluations," said Mr. Baptist, who previously served as Deputy Assistant Administrator for Law and Policy at the EPA's Office of Chemical Safety and Pollution Prevention. "But for those uses already determined to present unreasonable risk, EPA will continue to move as quickly as possible to issue risk management rules."

During a recent presentation at the GlobalChem Conference, Mr. Baptist said that approach would be valid only if the EPA can reopen some conclusions from the completed evaluations while allowing others to remain final. He added that revisiting already-completed evaluations could add to a resource crunch that is growing as the EPA's workload increases.

"We're going to have to very much pay attention as industry to make sure that the Agency has the information it needs and doesn't just fall back on conservative modeling assumptions because it lacks the time and resources to conduct more robust risk evaluations," Mr. Baptist said.

## Related Professionals

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## Practice Areas

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Environment & Product Regulation  
Toxic Substances Control Act (TSCA)  
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