

Martha Marrapese Comments on Proposed Extension of TSCA Fees Deadline

Inside EPA

April 21, 2020

Martha E. Marrapese, partner in Wiley's Environment & Product Regulation Practice, was quoted in an *Inside EPA* article regarding a request from industry lawyers that the Environmental Protection Agency (EPA) extend the Toxic Substances Control Act (TSCA) fees deadline, due to complications related to the coronavirus pandemic.

As reported by *Inside EPA*, the agency had initially set a March 27 deadline requiring companies to self-identify as manufacturing, processing, or importing any of the 20 chemicals the EPA is assessing under TSCA, and pay the associated fees to cover pending risk evaluations. That original deadline had been extended for 60 days until May 27.

During an April 16 conference call with EPA staff, Ms. Marrapese asked the agency to either extend the May 27 reporting deadline under the TSCA fee rule or extend the EPA's broader March 26 enforcement discretion policy so that it also applies to the fees rule.

"We have it on good information that companies are furloughing workers that may be responsible for this information," Ms. Marrapese said. She also asked the EPA whether the reporting requirement was going to be covered under the separate announcement on enforcement discretion by EPA's enforcement chief, indicating she hopes "that will be reconsidered if that deadline remains firm."

The article can be found here (*subscription required*).

Visit our COVID-19 Resource Center

Related Professionals

Martha E. Marrapese
Partner
202.719.7156
mmarrapese@wiley.law

Practice Areas

COVID-19 Resource Center
Environment & Product Regulation
Toxic Substances Control Act (TSCA)