

# Toxic Substances Control Act (TSCA) Services and Support



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**T**he Frank Lautenberg Chemical Safety for the 21<sup>st</sup> Century Act empowers the Environmental Protection Agency (EPA) to regulate new and existing chemicals in the U.S. market. CGI's knowledgeable professionals are prepared and available to guide your company through this unprecedented change in U.S. chemical regulation.

## TSCA – WHAT HAS CHANGED

The new law modernizes the Toxic Substances Control Act (TSCA), requiring many companies to revisit and think strategically about their approach to compliance. Highlighted areas of increased regulatory scrutiny include:

- Chemicals assessed by EPA may be subject to risk management rules or other restrictions around production, import, use and disposal.
- Designated high-priority chemicals are subject to information requests from EPA.
- Pre-manufacture Notice (PMN) review will be stringent and thorough, as EPA must make an affirmative finding for each PMN chemical.
- New Confidential Business Information (CBI) substantiation requirements have been established that apply to new and previous claims.

## BUSINESS IMPACT

If you manufacture chemicals or use chemicals in the manufacture of your products, then TSCA compliance is fundamental to ensuring your goods are well-received in the marketplace. Compliance with the law demonstrates the safety of your products and provides increased consumer confidence. Non-compliance can result in significant disruption to your business including civil administrative complaints which may be issued to anyone in violation, with penalties reaching \$27,500 per violation per day.

## WHAT YOU CAN DO

To plan for the impact TSCA Reform may have on your business, review your portfolio to identify the substances that may become high priority targets for regulatory action.

## HOW CGI CAN HELP

CGI will review your product portfolio and aid commercialization efforts by identifying applicable requirements and determining the steps necessary to comply with those requirements.



## TSCA SERVICES

CGI's tailored support for your company's success includes:

- Exemption Eligibility
- PMN Preparation
- Section 5 SNUNs
- Section 6 Chemical Restrictions
- Section 8 Recordkeeping / Reporting
- Understanding new CBI rules

## REGULATORY ADVISORY SERVICES

Complementary services include support for:

- EHS Compliance Audits
- Compliance and Change Management
- Mergers, Acquisitions and Divestitures
- Supply Chain Support
- Ongoing Business Process Services

Our regulatory experts will provide:

- Strategic advice on EPA's chemical review and approval processes addressing TSCA Sections 5 (PMN, SNUN) and 6 (chemical restrictions)
- Determination of exemption eligibility
- Assistance with reporting requirements for new and existing chemicals per TSCA Section 8
- Support for other activities including PMN filings and adherence to voluntary programs

In addition, CGI's experts will guide you through identifying how TSCA Reform changes EPA's treatment of confidential business information and how those changes impact your company's supply chain relationships.

Engaging CGI to assist your company's TSCA needs will allow you to leverage or team's extensive experience helping companies like yours, shorten your commercialization timeline, and facilitate clear, timely communication with your supply chain and EPA.

### CGI AND EPA

For the past 7 years, CGI has been supporting EPA in the management and modernization of the Central Data Exchange (CDX) which serves as the backbone for all EPA chemical registration and data submission activities by industry including TSCA. Through this support, CGI has led the development of all TSCA electronic submission processes including CDR e-PMN, Section 4 and Section 8(e) submissions. CGI also will be supporting the Office of Pollution Prevention and Toxics (OPPT) with necessary updates to support the mandates associated with TSCA modernization.

### REGULATORY EXPERIENCE AND EXPERTISE

CGI's Regulatory Solutions Group is focused on providing consulting, business process services and information technology solutions for environmental health and safety (EHS) business needs in the public and private sectors. CGI has nearly 20 years of experience partnering with leading organizations, including global chemical manufacturing and oil and gas firms, to implement effective strategies for complying with global regulatory changes like TSCA, REACH and GHS that improve our clients' compliance postures and bottom lines.

Tap into our team's 200+ years of combined experience in product and regulatory compliance to help position your company for success, now and in the future. Strategically leverage our hazard communication and dangerous goods experts to seamlessly support your global distribution of goods.



### ABOUT CGI

Founded in 1976, CGI is a global IT and business process services provider delivering high-quality business consulting, systems integration and managed services. With a deep commitment to providing innovative services and solutions, CGI has an industry-leading track record of delivering 95% of projects on-time and within budget, aligning our teams with clients' business strategies to achieve top-to-bottom line results.

For more information about CGI's regulatory solutions and services, visit [www.cgi.com/environment](http://www.cgi.com/environment), or contact us directly at [EHS@cgi.com](mailto:EHS@cgi.com)