



TSCA and the Forest Products Industry

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AF&PA supports congressional efforts to reform Toxic Substances Control Act (TSCA) and believes any such reform should encourage innovation in the manufacturing sector while protecting public health and the environment. AF&PA supports bipartisan efforts to reform TSCA in the 114th Congress.

The forest products industry is primarily a processor and user of chemicals, not a manufacturer of chemicals. Wood product manufacturers are subject to the use reporting requirements under TSCA. However, the industry's pulp and paper sector also produces several commercially valuable substances that are byproducts of the chemical wood pulping process, which are subject to TSCA inventory reporting requirements. As such, the industry is subject to manufacturing as well as processing and use regulations under TSCA.

- **One of the most important principles of TSCA reform is federal preemption of state laws.** The U.S. chemical management system should be maintained at the federal level to establish consistent requirements among federal agencies and states to ensure the flow of interstate commerce. A patchwork approach to chemical management, in which individual states have their own chemical requirements, is ineffective and contrary to principles of free interstate commerce. The regulatory framework should establish consistent standards and requirements and avoid duplication, conflict, public confusion, and business uncertainty.
- **Risk management decisions must carefully weigh risks, benefits and costs.** Regulatory controls should be tailored to managing unreasonable risks based on the weight of the scientific evidence. Ensuring safety by the most economically feasible means should be the rule.
- **Scientific peer review and public input are an essential part of the overall risk assessment process and any safe use determination.** By its very nature, the peer review process will bring new information to bear and can raise new scientific questions to be addressed. Industry should be considered a legitimate stakeholder in the scientific peer review process, and industry enterprises should be allowed to participate in the process just as environmental non-governmental organizations are allowed to participate.