



**Written Testimony of Richard E. Engler, Ph.D.
Director of Chemistry
Bergeson & Campbell, P.C.
On behalf of the Coalition for Chemical Innovations**

**United States Senate
Environment and Public Works Committee**

Hearing

March 4, 2026



Summary of Written Testimony of Richard E. Engler, Ph.D.

Ambiguities in key statutory terms have led to significant challenges in the U.S. Environmental Protection Agency's (EPA) review of new chemicals under the Toxic Substances Control Act (TSCA). Important among these are the difference between "not likely to present unreasonable risk" and "may present unreasonable risk" and how much certainty EPA must have to determine the former over the latter. Related is the term "intended, known, and reasonably foreseen" circumstances, part of the definition of "conditions of use." Currently, during the review of a TSCA premanufacture notice, if EPA finds any hazard other than low hazard for health or the environment (called "low/low" cases), EPA determines that the substance "may present" unreasonable risk, even if EPA does not identify risk in its review, because somebody might exceed EPA's concern thresholds in the future. EPA does this regardless of how much testing has been performed or how robust a submission is. EPA is then required to issue restrictions on the substance and those restrictions lead to commercial deselection, even if the restrictions do not prevent or prohibit the intended activities.

While it may seem intuitive to want all hazards addressed via some type of restriction, that construct is neither desirable nor good federal policy. We do not think that Congress intended EPA to apply a low hazard threshold for determining that a chemical is "not likely to present unreasonable risk" under TSCA. It would have so stated if it did.

The Coalition for Chemical Innovations (CCI) has been advocating for changes to EPA's interpretation and implementation of these terms for several years and is of the view that EPA will not change its interpretation absent Congress making changes to TSCA. CCI respectfully requests that Congress clarify the difference between "not likely to present" and "may present"; the definition of "reasonably foreseen" to exclude violations of other federal statutes and exclude merely hypothetical circumstances; and the meaning of "unreasonable risks" to exclude everyday hazards that are familiar and routinely addressed by companies and individuals.

These changes will not undermine health and safety, rather they will allow EPA to focus its time and attention on hazards and exposures that do need EPA's careful attention. It will also avoid burdening new, outstanding, sustainable chemistry with commercially disadvantageous restrictions and recordkeeping obligations.

CCI implores Congress to act now to ensure that EPA has the resources it needs to review timely new chemical notices by providing appropriated funds and fee authority and that EPA is using its authority appropriately to protect workers, consumers, the general public, and the environment from real-world unreasonable risks. EPA protecting against all hypothetical risks, including risks that are managed by other statutes, is not a good use of EPA's time and effort and undermines the commercial adoption of more sustainable chemistry. Absent congressional action, U.S. innovation will continue to suffer, as it has in recent years; innovative companies will continue to commercialize products outside of the United States, denying U.S. customers the economic, health, and environmental benefits that can arise from those innovations.



Written Testimony of Richard E. Engler, Ph.D.

Good morning, Chairman Capito, Ranking Member Whitehouse, Chairman Curtis, Ranking Member Merkley, and Members of the Committee. Thank you for inviting me to testify today about the Toxic Substances Control Act (TSCA) and opportunities for improvement.

Personal Background and Experience with TSCA

My name is Richard Engler. I am here today to speak about TSCA new chemicals based on my experience as a former U.S. Environmental Protection Agency (EPA) employee and, for the past 11 years, as the Director of Chemistry at Bergeson & Campbell, P.C. (B&C[®]) and The Acta Group (Acta[®]). After several years of B&C and Acta clients struggling with TSCA new chemicals submissions, B&C formed the Coalition for Chemical Innovations (CCI) to advocate for improved implementation policies at EPA under both the Biden and Trump Administrations and, more recently, to advocate for legislative changes to TSCA. My testimony today focuses on the TSCA New Chemicals Program.

I earned a Ph.D. from the University of California, San Diego. I taught introductory organic chemistry and other classes before joining EPA's Headquarters office in 1997 as a staff chemist. During my 17-year career at EPA, I participated in the review of thousands of premanufacture notices (PMN) and low volume exemptions (LVE). My primary role was reviewing the identity and properties of the chemicals so that the other EPA assessors had the key information needed to perform a complete assessment. I also participated in hazard assessment meetings and decision-making meetings. While at EPA, I also ran the Green Chemistry Program, including the Presidential Green Chemistry Challenge Award. I left EPA in 2015 to join B&C and Acta.



B&C and Acta support clients with chemical registrations in the United States and around the world. Both entities assist with TSCA, the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), the Federal Food, Drug, and Cosmetic Act (FFDCA), and with Globally Harmonized System of Classification and Labeling of Chemicals (GHS)/Occupational Safety and Health Administration (OSHA) compliance. Acta also assists with global registration systems, including the Canadian Environmental Protection Act, 1999 (CEPA), the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), UK REACH, Korea REACH (K-REACH), and other chemical control statutes. I provide chemistry support across those statutes with a particular expertise in TSCA. During my 11 years with B&C and Acta, I have assisted clients with hundreds of new chemical notifications, referred to as Premanufacture Notifications or PMNs, and exemption notices, such as Low Volume Exemptions or LVEs, both before and after the enactment of Lautenberg, and am intimately familiar with how EPA has in the past and is now conducting review of new chemicals.

Ten Years of Implementation

In the nearly ten years since enactment of the Frank R. Lautenberg Chemical Safety for the 21st Century Act, EPA has reviewed thousands of new chemicals, including PMNs and LVEs -- a noteworthy achievement. Unfortunately, EPA has struggled to keep up with the pace of submissions and complete its reviews within the statutory or regulatory review periods. Submitters have been justifiably frustrated by extended review times and unpredictable scientific and regulatory outcomes. These uncertainties make commercial planning very challenging. In some cases, clients have made the difficult decision to abandon the technology because the markets



vanished. In at least one case, a client company was liquidated before EPA could complete the PMN review, which spanned over several years.

EPA has been frustrated, too. We know EPA professionals have been working diligently to make the program work for the past ten years, streamlining processes and enhancing approaches. Unfortunately, these efforts have not yielded the success that both EPA and the regulated community seek. Some say that EPA should take all the time it needs to review a case, regardless of how long that might be. Yes, EPA is required to review each submission and make a safety determination, but TSCA also imposes statutory deadlines and requires that decisions be consistent with the best available science and based on the weight of the scientific evidence. The implementation of the program is not living up to these standards.

Delays arise for different reasons. Some delays are due to poorly constructed submissions or submitters providing additional information after submission. Some delays are due to EPA resource limitations, while others are due to EPA having to implement the 2016 Lautenberg amendments while continuing to operate the program. Delays arise from EPA errors in its reviews and others are due to EPA's inappropriate interpretation and application of key statutory terms in TSCA. Contrary to what we have heard from several witnesses in other hearings, in our experience, delays are not primarily due to lack of data in submissions. In December 2024, EPA updated its regulations governing new chemicals submissions to require more robust submissions, help avoid poorly supported submissions, and cut down on additional information being provided late in the process. Even with very robust submissions that include many study reports on the toxicity of the new substance and extensive descriptions of the protective measures employed to protect workers and control releases, submissions linger in EPA's queue. In short, more and better data on new



chemicals is clearly not the magic-bullet answer. It is not a matter of EPA resources. As shown in Table 1, EPA's number of determinations did not change substantially after the budget plus-up in fiscal year (FY) 2023.

Also challenging is the inconsistent nature of EPA's reviews. Cases that appear to be very similar can receive very different outcomes. We have had a client submit the same information two different times and received different answers from EPA. While this is largely an EPA implementation issue, it has its roots in statutory ambiguities. Individual assessors, for example, unsurprisingly have different views of key statutory terms, such as "may present unreasonable risk" and "intended, known, and reasonably foreseen" circumstances for the substance's manufacture, processing, use, and disposal.

While our clients have advocated individually and through consortia to help EPA understand the likelihood of exposures and what circumstances are "reasonably foreseen," EPA has been resolute in finding the vast majority of new chemicals may present unreasonable risk and restricting them. Specifically, if EPA finds that a substance has any hazard other than low hazard for health or the environment (called "low/low" cases), EPA determines that the substance "may present" unreasonable risk, which requires EPA to restrict that substance under TSCA through an order and/or a Significant New Use Rule (SNUR). In fact, in recent years, EPA no longer even assesses the risks associated with reasonably foreseen uses; rather, EPA evaluates the hazard, the exposures associated with the intended uses; applies worst-case assumptions regarding potential future circumstances, and, unless the substance is low/low, imposes restrictions, usually to limit the submitter to the intended conditions included in the submission. Often, companies reluctantly agree to very restrictive terms solely to achieve commercialization. Other submitters seek to



negotiate terms that better align with EPA's risk assessment, which can take months and invite uncertain outcomes. Let me be clear, EPA's decision to issue a restriction is not solely because of the absence of data, despite what some witnesses have testified in the past. We have assisted clients with preparing and submitting very robust PMN submissions supported by significant test data. The presence or absence of data is not determinative. Under EPA's approach, there is no way to test out of a restriction unless testing shows low hazard. This is an odd result when one of the major drivers of TSCA reform in 2016 was the view that more data on substances were needed, a result we believe is not aligned with TSCA. As it stands, companies eschew the time and expense of testing because experience has shown that testing does not shorten the review period, nor does it avoid the restriction (unless the testing shows low/low).

While it may seem intuitive to want all hazards addressed via some type of restriction, that construct is neither desirable nor good federal policy. We do not think that Congress intended EPA to apply a low hazard threshold for determining that a chemical is "not likely to present unreasonable risk" under TSCA. It would have so stated if it did.

What CCI seeks is for Congress to provide greater clarity on when EPA must use its TSCA authority to protect against potential risks. In 2016, Congress considered and rejected the "reasonable likelihood of no harm" standard for TSCA reviews, and yet that is essentially what EPA is doing and has done over four administrations now. New chemical submitters are loathe to litigate on products that are not yet commercial. Why spend the substantial time, effort, and money to fight for a non-existent revenue stream, with an uncertain outcome, and potentially souring a cooperative relationship with EPA? Instead of challenging EPA, many submitters make the difficult decision to walk away or never seek a new chemical approval under TSCA. They instead



commercialize in other countries, even in the European Union under REACH, or in the United States for non-TSCA purposes. You can see the change in the number of PMN submissions. Before 2016, EPA usually received at least 600 PMNs per year. In FY2017, EPA received 437 PMNs. In FY2025, EPA received only 156 PMNs. Notices of Commencement (NOC; submissions to EPA that indicate that the company has commenced commercial import or production) have dropped dramatically as well. EPA received 364 NOCs in 2015, the year before TSCA reform, 301 in 2017, the year immediately following enactment, 130 in 2021, and only 42 in 2025. Fewer PMNs and fewer NOCs mean fewer innovative chemistries are being brought to market in the United States.

Commercial Consequences of Regulatory Outcomes

For the companies that do make it through the TSCA review process, their chemicals are almost always subject to restrictions imposed through a consent order and SNUR. But if those restrictions align with the company's intended safety practices, you might reasonably ask "What's the big deal?" The answer is in the optics of the restrictions and the enforcement risk down the supply chain. We have been told by senior leadership at EPA that downstream customers will eventually "get used to" everything being restricted with SNURs and will no longer view restrictions as indicators of the new product being especially hazardous. In ten years, I can assure you, there has been little change. Even more important than the downstream customers' perceptions of buying a restricted new chemical is their concern regarding enforcement risk. Companies that are confident in their ability to protect workers, neighboring communities, and the environment still fear an EPA inspection. A company has to have documents that demonstrate to an EPA inspector's satisfaction that the company has consistently abided by the protective terms. In addition, the company has greater reporting burdens under the quadrennial Chemical Data Reporting (CDR) rule. A Section



5 restriction triggers export notices under TSCA Section 12, so a company that exports any quantity of the substance, even research samples of just a few ounces, must inform EPA prior to the first export to each destination country. Fines can add up fast. Each missing export notice is over \$10,000. An error in a CDR report? Closer to \$25,000 per chemical. No records documenting the company did not exceed the release or exposure limits? Nearly \$50,000 per day. It does not matter that no harm occurred. The paperwork mistake is a violation. On top of that, EPA makes a point of targeting substances with SNURs and orders resulting in a much greater risk from enforcement. It is not just the fines, which can add up to hundreds of thousands, or even millions, of dollars, it is also the negative publicity when the violation and fine become public. The easiest thing for customers to do is simply avoid the restricted substance -- and they do. The benefit of a new substance with a SNUR over an incumbent existing chemical has to be enormous for a company to be able to justify the business risk.

Allow me to remind you of an example from my previous testimony: If a company that manufactures or uses a chemical has a new employee that performs all the required protective measures but fails to produce a record, each day without the paperwork record could be a \$50,000 fine. That is \$250,000 for a five-day workweek even though the operations were otherwise compliant. If a supervisor only reviews the records after six months, that could be \$6.5 million of fines -- again not for failing to take the protective measures but failing to produce the paperwork. Consider this more familiar example: Let's assume that EPA reviews a new model car and finds that the car, if poorly maintained, presents an increased risk of fire, so imposes a requirement to perform routine maintenance at precise intervals. That same risk of fire exists for an older model car, but regardless, regular maintenance protects against that risk. You, as a responsible car owner,



do routine maintenance whether it is the old car or the new one, but you worry that you might not be able to find a record of every visit to the mechanic or you might go a bit over the mileage that triggers the maintenance. In either case, it would be viewed as a violation for the new model car owner. In addition, the police, when they see your model car, are more likely to pull you over to review your maintenance records. Wouldn't you hesitate to buy that car? Would you hesitate to buy that car for a novice driver that might not be as assiduous with maintenance and recordkeeping? It is this fear that leads customers to avoid substances with restrictions. An easier way to avoid the violation is to simply buy a different car that is not burdened by the recordkeeping requirement and associated enforcement risk. That is what happens to new chemicals with restrictions. Yes, you can operate within the restrictions, but the enforcement risk is rarely worth it. It is our view that new chemicals are over-regulated -- without any meaningful added benefits to public health and the environment -- and that Congress has an opportunity here to make targeted adjustments to avoid these unnecessary outcomes.

This may seem like industry grousing, but as a society, we do not insist on this level of risk mitigation. Consider the example from my testimony before the House of Representatives in January 2025. I used a shark and swimmers to elucidate the difference between hazard and risk. A shark in the ocean is a hazard to swimmers, but the shark is not a risk to swimmers if the shark and swimmer are not near each other.

EPA's approach to new chemicals is to essentially find that because sharks and swimmers both swim in the ocean, it is reasonable to foresee that they might at some point cross paths and have a dangerous interaction. EPA therefore concludes that swimming with sharks may present unreasonable risks to health. As a result, EPA imposes a requirement that every beach owner



provide shark cages for all swimmers and require each swimmer to use the cage and keep records documenting that fact. If the owner does not have records to that effect, the beach owner faces enormous fines -- even if there was no shark nearby. You can also imagine that a swimmer going to a beach that requires shark cages might be reluctant to swim there. The swimmer is allowed to swim, but the appearance of higher risk and the inconvenience of having to deal with the shark cage would reasonably lead people to swim in lakes or pools rather than the ocean. EPA is saying that eventually swimmers will “get over it.” After all, EPA is letting you swim in the ocean, what is the problem? I do not think this is what Congress intends for EPA to do. Regulations have costs and add economic friction. Those regulations need to be deployed thoughtfully, not to protect against any possible risk. Congress must act to clarify the scope of EPA’s reviews and under what circumstances EPA should deploy its TSCA authority.

We are not talking about per- and polyfluoroalkyl substances (PFAS) with shorter chains that may still pose an unreasonable risk (the equivalent of replacing a megalodon with a great white shark). EPA applies its overly conservative approach equally to PFAS, battery materials, fragrances, cleaning agents, and solvents, including highly hazardous substances and substances that are biobased, biodegradable, and among the lowest hazard in their class -- low enough to be included on EPA’s Safer Choice Program list of safer ingredients. In EPA’s view, if there is a hazard, there may be a risk, so EPA concludes that the substance “may present” unreasonable risk and is therefore obligated to issue an order regardless of the magnitude of the risk, whether the circumstances that would lead to a risk are reasonably foreseen, and how likely those substances are to present unreasonable risk.



Let me give you an example: We assisted a client with a case for a biobased, biodegradable laundry ingredient. EPA's only concern was the potential for aquatic toxicity. EPA's worst-case assumptions did not lead EPA to identify risk, but EPA imposed a restriction anyway because EPA still had concerns for aquatic toxicity, although the aquatic toxicity concern level was substantially lower than other ingredients in its class and it is the only ingredient in its class that is readily biodegradable. Using EPA's own worst-case models, we showed that to exceed EPA's aquatic toxicity concern threshold, seven times the entire annual production volume would have to be mixed into the product at the known processing site and four times the annual production volume of the substance had to be processed into smaller packages at a single, unknown small facility. Given that both these multiples are greater than the size of the entire laundry detergent market in the United States, we argued to EPA that this was not "reasonably foreseen" that there would be exceedances, but EPA insisted that it could not be confident that there would not be an exceedance and that "somebody could" exceed that threshold in the future. While technically true, it is also technically true that there might be a great white shark lurking off of any beach. In another case, again for a biobased, biodegradable cleaning ingredient, EPA imposes a surface water limit and restrictions on the content in consumer products because the substance is irritating. That it is less toxic to fish and less irritating than incumbents is immaterial. That EPA did not predict risk is also immaterial. That a consumer might splash or spray it in their eye is enough. I do not need EPA to tell me to not spray irritating products in my eyes. The mere possibility of a risk does not justify application of EPA's limited review and enforcement resources, or the added financial strains and administrative burdens on regulated companies. The result of EPA's approach is that great sustainable products -- *products that have been thoroughly tested for safety and far surpass*



others in their category -- are being restricted in ways that make them commercially undesirable or, in some cases, impermissible in products that would benefit consumers and the environment.

If the hazard justifies the protection, then, yes, get out the shark cages. This is what EPA is doing because the statute states that if EPA determines that a substance “may present unreasonable risk,” EPA must issue a restriction. Without certainty that a risk cannot happen -- a grossly overextended view of the statutory standard to review what is “not likely” and “reasonably foreseen” -- EPA is putting shark cages on nearly every PMN. Only when EPA finds a shark that cannot bite a person -- those rare, low/low cases -- EPA forgoing shark cages.

We have also assisted clients with highly hazardous substances used in industrial settings, such as semiconductor manufacturing, lithium-ion batteries, and in military applications. These are the cases that are more likely to justify a restriction. But even with highly hazardous substances, the properties of the substance may be such that EPA need not issue an order. We assisted a client with a new chemical submission for a pyrophoric substance (one that burns spontaneously in air) intended for semiconductor manufacturing. The company already knew it was essential to manage the substance very carefully -- to ensure that it remains in an entirely enclosed system -- because to do otherwise would result in a catastrophic fire. These same protections also incidentally prevented any worker exposure and releases to the environment. But is it “reasonably foreseen” that a worker be exposed to the chemical? Does it make sense to issue a restriction to require workers wear gloves impervious to the substance when the fire hazard is everyone’s greatest concern?

Congress must act to clarify key statutory terms, including what is an unreasonable risk and the boundaries of what is reasonably foreseen. Congress needs to communicate clearly that EPA need



not be absolutely certain that no risk will ever occur. EPA can, and should, use models and assumptions to fill data gaps and inform what is reasonably foreseen -- EPA should evaluate the size, aggressiveness, and potential presence of sharks -- but EPA should not be assuming that anything can and will happen. Congress should provide clear guidelines on how EPA should be exercising its judgment regarding the likelihood of some conditions of use ever occurring. While theoretically true that once on the Inventory “anybody can use it for anything” as we have been told numerous times by EPA, it is not scientifically true. One cannot use a solvent as construction material, nor can one use a pyrophoric intended for semiconductor manufacturing in a child’s toy. That laundry ingredient? It cannot be used in a car body. EPA can use its extensive historic data, including past PMNs, CDR data, and commercially available market data, as well as data on the substance and its analogs to inform the reasonably foreseen circumstances, but Congress has to tell EPA that “reasonably foreseen” does not mean “theoretically possible.” Otherwise, EPA will continue its current course of conduct and continue to keep excellent, sustainable products from commercial adoption in the United States. Our health, our environment, and our economy will be poorer for it.

Let me provide another example. If skin corrosion, that is, chemical burns, is an unreasonable risk that necessitates a TSCA restriction, I believe that one could argue that thermal burns are also an unreasonable risk. Nothing in TSCA differentiates the two. Does that mean that EPA must issue restrictions for substances that can get hot and cause burns? I do not see any language in the statute that would preclude EPA from doing so and, in fact, given EPA’s view on chemical burns, to be consistent, EPA must issue restrictions to protect against thermal burns.



What would that look like? It is reasonably foreseeable that a consumer will touch a hot steel oven rack without an oven mitt. Let's imagine that EPA is reviewing steel under TSCA. During review of steel, EPA would conclude that the substance presents an unreasonable risk when used at a high temperature and would seek to prohibit its use in oven racks, forcing use of a more expensive, non-heat-conductive alternative rack material. Should we all have to double the cost of an oven to protect against thermal burns or can EPA assume that a reasonable person will take measures to protect themselves from a common hazard such as a hot oven rack? If this committee views hot oven racks as not a risk for which EPA should apply its authority, Congress must clarify its intent in the statute. Adjustments to the statute are necessary to ensure EPA's interpretation and application of "reasonably foreseen" and "unreasonable risk" are grounded in reason and common sense.

It makes sense for EPA to use TSCA to protect against invisible hazards, such as systemic, developmental, or reproductive toxicity. I would argue that TSCA authority is not needed to protect against common, everyday hazards, including irritation, corrosion, flammability, asphyxiation, or inert dust. It is not that these hazards do not require protection, it is that these are everyday hazards, common across thousands of chemicals, that reasonable people can and do routinely manage. They are also hazards for which companies routinely warn, either to protect themselves from tort liability or to satisfy their obligations under the Federal Hazardous Substances Act (FHSA) and the Consumer Products Safety Commission (CPSC).

It also makes sense that EPA be required to assume compliance with other federal statutes, including the Occupational Safety and Health Act (OSH Act) and FHSA and other EPA authorities. Whether such compliance is sufficiently protective is a separate question. That many OSHA



permissible exposure limits (PEL) are out of date and potentially not sufficiently protective, or that some workplaces might not be subject to OSHA requirements are valid points, but separate from the question as to whether companies that are subject to OSHA requirements comply and reduce their employees' exposures accordingly. EPA should be supplementing, not duplicating, other authorities.

Conclusion

In summary, a decade of experience with the Lautenberg Act amendments has demonstrated unequivocally a need for greater clarity in key terms and more specific direction on the scope of its reviews. Doing so will allow EPA to better focus its limited resources on assessing and managing real-world risks to public health and environment and achieve the necessary efficiencies to begin meeting the existing statutory deadlines. Absent these changes, TSCA will continue to choke the development and adoption of novel, safer, greener, and more innovative chemistry. In addition, Congress must act to equip EPA with adequate resources to do the job assigned, both in the form of reauthorized fee authority and minimum levels of annual appropriations. American innovation can wait no longer. Our members implore you to act to improve TSCA and position EPA, industry, and the public for a safer and more sustainable future.

Other publications on this topic:

- Bergeson & Campbell, P.C. and The Acta Group, [Forecast for U.S. Federal and International Chemical Regulatory Policy 2025](#).
- Lynn L. Bergeson and Richard E. Engler, Ph.D., "[Optimizing the Toxic Substances Control Act to Achieve Greener Chemicals](#)," American Bar Association *NR&E*, Summer 2022.



- Richard E. Engler, Ph.D. and Jeffery T. Morris, Ph.D., “[Why the US EPA can, and should, evaluate the risk-reducing role a new chemical may play if allowed on the market](#),” *Chemical Watch*, February 22, 2021.
- Lynn L. Bergeson, Richard E. Engler, Charles M. Auer, and Kathleen M. Roberts, “[New Chemicals Under New TSCA — Stalled Commercialization](#),” *Bloomberg Environment Insights*, September 11-13, 2018.



Determination Year	Number of PMN Determinations	Percentage of PMN Determinations that Include Restrictions	Number of Withdrawn Cases
2016	37	22%	35
2017	324	88%	113
2018	206	88%	69
2019	293	81%	43
2020	235	90%	41
2021	87	68%	56
2022	96	95%	17
2023	101	90%	32
2024	144	91%	21
2025	89	89%	27
2026	25	92%	2
Total	1515	85%	17%

Table 1: Table of PMN determinations made in each calendar year and the percent of those determinations that include restrictions of some kind. Withdrawn cases are instances in which the submitter withdrew the PMN; this is often, but not always, in the face of EPA’s proposal of commercially unacceptable restrictions.

Source: EPA. Premanufacture Notices (PMNs) and Significant New Use Notices (SNUNs) Table, <https://www.epa.gov/reviewing-new-chemicals-under-toxic-substances-control-act-tsca/premanufacture-notices-pmns-and>, as of February 18, 2026, supplemented with *Federal Register* notices.