

Society for Chemical Hazard Communication Spring Meeting

**Protecting Trade Secrets Around the World
Part 1: Comparing CBI Requirements under New TSCA and OSHA HCS 2012**

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Presenter biography

Sheryl L. Dolan is a Senior Regulatory Consultant with Bergeson & Campbell, P.C. (B&C®). Ms. Dolan specializes in addressing complex chemical compliance management under federal and state law, including the U.S. Toxic Substances Control Act (TSCA) and the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). Her clients include manufacturers of industrial and consumer products, conventional and nanoscale chemicals, intergeneric microorganisms, and pesticides. Ms. Dolan is adept at assisting clients to bring new and/or improved products to market by obtaining timely regulatory approvals of novel and innovative chemistries. She regularly advocates for B&C's clients in interactions with the U.S. Environmental Protection Agency's (EPA) Office of Pollution Prevention and Toxics (OPPT) and Office of Pesticide Programs (OPP). For communications within the supply chain and with regulatory authorities, Ms. Dolan assists clients in protecting their trade secrets while navigating the applicable regulatory requirements. Ms. Dolan is a graduate of Cornell University (BA, Chemistry) and received her JD from George Washington University's National Law Center. Ms. Dolan is not a practicing attorney.

Presentation abstract

On June 7, 2016, Congress passed the Frank R. Lautenberg Chemical Safety for the 21st Century Act (New TSCA). President Obama signed the measure into law on June 22, 2016. New TSCA differs from old TSCA in many significant ways. In this Right-to-Know age and after many years of debate concerning the protections afforded confidential business information (CBI), it is not surprising that New TSCA makes important changes as to what information will be protected, for how long, and under what circumstances. Companies will need to do more to protect less. This presentation will review the requirements for CBI protection under New TSCA, compare these requirements with those under the OSHA Hazard Communication Standard, and discuss how Society for Chemical Hazard Communication (SCHC) professionals should manage compliance under both to establish consistent protection for their businesses' trade secrets.