

February 18, 2020

Document Control Office (7407M)  
Office of Pollution Prevention and Toxics  
Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460-0001

Submitted online via the Federal eRulemaking Portal: <http://www.regulations.gov>

**Re: Docket ID No. EPA-HQ-OPPT-2019-0677 – Preliminary Lists Identifying Manufacturers Subject to Fee Obligations for EPA-Initiated Risk Evaluations Under Section 6 of the Toxic Substances Control Act (TSCA) – Extension Request**

Dear Sir or Madam:

The Consumer Technology Association™ (CTA) submits a request for a 60 day extension in response to the Preliminary Lists Identifying Manufacturers Subject to Fee Obligations for EPA-Initiated Risk Evaluations Under Section 6 of the Toxic Substances Control Act (TSCA) (Docket ID No. EPA-HQ-OPPT-2019-0677).

As North America's largest technology trade association, CTA® is the tech sector. Our members are the world's leading innovators – from startups to global brands – helping support more than 18 million American jobs. Over 80% of CTA's member companies are small businesses while the remaining 20% include some of the world's best-known brands and retailers of consumer technology.

CTA's members may be importers of articles containing a high-priority chemical substance under the Toxic Substances Control Act (TSCA) and therefore subject to self-identification as a "manufacturer" pursuant to the fee obligations for EPA initiated risk evaluations under Section 6 of TSCA. Many of our members have in place extensive chemical management programs which are structured around banning or limiting (*e.g.*, *de minimis* levels) the presence of chemicals within their complex, global supply chain in line with restrictions found throughout the world (*e.g.*, TSCA, the European Union's Restriction of Hazardous Substances Directive). These companies do not require their supply chains to identify the presence and amount of every chemical type for every article. As such, because there does not appear to be an exemption for *de minimis* quantities, it is a complicated and time-consuming endeavor for companies to undertake a thorough evaluation to identify whether the 20 high priority substances may be found within their articles, even in trace amounts that are compliant with global regulatory requirements. Our members are challenged to be able to conduct that evaluation within the 60-day timeframe provided by this Federal Register notice.

CTA respectfully requests an extension of 60 days for companies to self-identify as an importer of articles containing a high-priority substance. Given the complex nature of global supply chains, CTA's members need additional time beyond the 60 days to adequately assess the presence of high priority substances within the articles they import.

Thank you for allowing CTA to submit this request for an extension and we thank the EPA for its continued collaboration. Please contact me at [kreilly@cta.tech](mailto:kreilly@cta.tech) or (703) 625-0054 if you have any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Katie Reilly', written in a cursive style.

Katie Reilly  
Senior Manager, Environmental and Sustainability Policy