

Double Collections of TSCA Fees

12 ACC members submitted responses to the Friday poll. The double collection of TSCA Fees directly affected 1/12 members in this small sampling. However, 8 out of 12 anticipate this issue being a potential issue in the future.

1. Has there been a double collection of TSCA Section 6 Fees through your supply chain for any of the 20 high priority substances?
 - Yes 1
 - No 11

2. If yes and if known, please note the cost associated with this double collection.
 - Member exported the domestically purchased HPS for processing and imported the chemical in a 40% solution of a formulated product one time, in 2019, and the volume was 1600 kgs. The Section 6 fee for Member is \$261,000 based on the most recent final list, which is greater than the contribution margin for a number of years and puts the new product launch at risk. 1600 kgs is 0.1% of the total 2015 CDR volume.

3. Was your company charged as importer for any of the 20 high priority substances that was originally manufactured in the United States but processed outside of the United States?
 - Yes 1
 - No 11

4. If your company did not encounter double collections for this round of 20 high priority substances, do you foresee this being an issue for your company or your supply chain in the future?
 - Yes 8
 - No 4