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**From:** Jamie Conrad [jamie@conradcounsel.com]  
**Sent:** 6/19/2017 9:32:57 PM  
**Subject:** Chemical Watch publishes my article on the "null hypothesis" under TSCA § 5  
**Attachments:** James W. Conrad Jr..vcf; CW Global Business Briefing June 2017.pdf; Nullify\_This\_Hypothesis.pdf

**Importance:** High

The June 2017 issue of Chemical Watch's Global Business Briefing, published today, contains a piece I wrote that identifies one — if not the principal — reason the TSCA new chemicals program has become so slow and conservative since last June's amendments. Several key TSCA staff have told me that they think those amendments changed the "null hypothesis" under Section 5, from "presume safe" to "presume unsafe." My article argues that this view is not supported by the statute, which requires EPA to approach new chemical submissions without a bias one way or the other. I also explain why, if anything, TSCA can and should be administered to create a bias toward new chemistry.

The article is pp. 12-13 of the attached pdf. You can also find it [here](#) if you're a subscriber. Coincidentally (so far as I know), pp. 18-19 of the same issue contain a piece by Richard Denison on essentially the same topic, though from the opposite perspective. Clearly the TSCA topic du jour.

I've also written another version of the article that contains a lot more detail. You can access it on my website [here](#). I've attached a pdf of it, too.

Reactions welcome!

-- Jamie

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