

# PUBLIC SUBMISSION

<b>As of:</b> 9/11/25, 4:05 PM
<b>Received:</b> August 05, 2025
<b>Status:</b> Posted
<b>Posted:</b> August 07, 2025
<b>Tracking No.</b> mdy-z1wk-viwj
<b>Comments Due:</b> August 11, 2025
<b>Submission Type:</b> API

**Docket:** EPA-HQ-OPPT-2017-0652

Information Collection for Expanded Access to TSCA Confidential Business Information

**Comment On:** EPA-HQ-OPPT-2017-0652-0048

Agency Information Collection Activities; Proposed Renewal of an Existing ICR Collection and Request for Comment; Access to TSCA Confidential Business Information Under TSCA Section 14(d)(4), (5), and (6)

**Document:** EPA-HQ-OPPT-2017-0652-0054

Anonymous public comment

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## Submitter Information

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## General Comment

Notice Title:

Agency Information Collection Activities; Proposed Renewal of an Existing ICR Collection and Request for Comment; Access to TSCA Confidential Business Information Under TSCA Section 14(d)(4), (5), and (6)

Federal Register Citation: 90 FR 24399

Document Number: 2025-10461

Docket ID: EPA-HQ-OPPT-2017-0652

Date Submitted: August 5, 2025

Comment:

To Whom It May Concern,

I am submitting this comment in response to EPA's proposed renewal of information collection activities regarding contractor access to Confidential Business Information (CBI) under Sections 14(d)(4), (5), and (6) of the Toxic Substances Control Act (TSCA).

Confidential Business Information safeguards are vital for maintaining innovation and economic competitiveness. However, they must be balanced with transparency, environmental accountability, and public access to critical emissions data—especially for pollutants with systemic, long-term impacts such as carbon dioxide (CO<sub>2</sub>) and other greenhouse gases (GHGs).

I respectfully request the EPA consider the following in the context of this ICR renewal:

**Public Right to Know About GHGs:** CO<sub>2</sub> emissions associated with TSCA-regulated chemicals and processes often have significant environmental and public health implications. These emissions should not be classified as confidential where they pertain to facility-scale outputs or process-related climate impacts.

**Avoid Overclassification of Climate-Relevant Data:** The agency should issue guidance preventing companies from overusing CBI claims to shield GHG-related disclosures that are essential for evaluating environmental risks. While certain chemical identities may warrant protection, data concerning energy use, lifecycle emissions, or combustion intensity should remain accessible.

**Support Climate Accountability Across TSCA:** As EPA implements the 2009 Endangerment Finding and other climate-related mandates, it is critical that contractors with access to CBI are also equipped to evaluate CO<sub>2</sub> data in ways that inform climate-conscious decision-making. This includes evaluating cumulative emissions, process efficiency, and environmental trade-offs.

**TSCA Reform and the Public Interest:** Congress intended TSCA reform to improve transparency and public trust. Ensuring CO<sub>2</sub>-related disclosures are not inadvertently suppressed through contractor CBI access protocols aligns with the law's spirit and long-term environmental goals.

I encourage EPA to update its contractor access protocols to reflect the growing importance of climate science in chemical evaluation and environmental governance. Strong guardrails against misuse of confidentiality are essential to maintaining public trust while achieving emissions reductions.

Thank you for your consideration.

Sincerely,  
A Concerned Citizen  
Submitted Anonymously  
Date: August 5, 2025