

Legal Lookout: North American ChAMP Revealed

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In March, EPA announced that it intends to fulfill its Montebello commitments through the Chemical Assessment and Management Program (ChAMP).

As reported in the January 2008 issue of *Pollution Engineering*, EPA, Canada and Mexico announced last August efforts to ensure the safe manufacture and use of industrial chemicals, entering into a regional partnership for assessing and managing potential chemical risks. As part of what is referred to as the "Montebello Agreement" made at the Security and Prosperity Partnership (SPP) of North America Leaders' Summit in Montebello, Quebec, the three countries agreed to coordinate efforts to assess approximately 9,000 industrial chemicals that are produced or imported in volumes above 25,000 pounds per year.

ChAMP commitments

Under the agreement made in Montebello, the countries agreed to various milestones. By 2012, the United States agreed to complete risk characterizations and initiate needed action on 6,750 existing chemicals produced in quantities above 25,000 pounds per year.

This will be undertaken by ChAMP. It is patterned after the High Production Volume (HPV) Challenge Program, and will build upon the success of that program and the Canadian Chemical Management Plan. Canada will complete assessments and take regulatory action on its highest priority substances, and initiate assessments of medium priority substances. Mexico will develop an information system for dangerous materials. All three countries will enhance appropriate coordination in the areas of testing, research, information gathering, assessment and risk management actions.

By 2020, the trilateral cooperation will strive to establish and/or update inventories of chemicals in commerce. EPA has created a new website about ChAMP at www.epa.gov/champ/pubs/basic.htm. The program's resources include the HPV chemical data, hazard characterization documents, risk-based prioritization of HPV chemicals and other information.

Implications

Chemical review and risk assessment is a high EPA priority. The commitments made last August by the U.S. are ambitious. If certain substances are perceived to pose risks, this information will have consequences for suppliers, formulators and product manufacturers. The distribution chain is also a critically important component of the value chain.

Chemical manufacturers, formulators, users and distributors are urged to monitor ChAMP, participate in the chemical assessments, and ensure their interests are reflected and protected. Monitoring chemical management policies as they evolve is critical to commercial sustainability for any product with a significant chemical component.

In this election year, there will be intense pressure on EPA to show that it is every bit as protective of human health and the environment as its European counterparts, which have the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) program to

demonstrate their commitment to chemical management. EPA is committed to ChAMP. It reflects the federal government's commitment to chemical management, and for that reason will be closely watched by non-governmental organizations and others who believe U.S. chemical management is not as robust as it should be. Business interests have every reason, therefore, to ensure the program is successful and fulfills domestic commitments to comprehensive chemical management. PE

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