



Advocacy Recommends that EPA Address Small Businesses Concerns in the Proposed Reporting and Recordkeeping Requirements for Nanoscale Materials

On August 3, 2015, the Office of Advocacy (Advocacy) filed a comment letter with the U.S. Environmental Protection Agency (EPA) regarding its proposed rule entitled, “TSCA Reporting and Recordkeeping Requirements for Chemical Substances When Manufactured or Processed as Nanoscale Materials.” A complete copy of Advocacy’s letter to EPA may be accessed [here](#).

- On April 6, 2015, EPA issued the proposed rule, which will:
 - Impose one-time electronic reporting and recordkeeping of nanoscale materials for manufacturers and processors,
 - Require both manufacturers and processors to report on the same submission form; and
 - Reduce the qualification for the small business exemption.

Based on small business feedback, Advocacy is concerned that this rule will result in unnecessary and unjustified burdens and substantial costs for small businesses. Advocacy urges EPA to consider small businesses’ recommendations to address their important concerns by:

- Increasing the total annual sales value for the small business exemption,
- Providing data and clarity for the regulation of processors,
- Accounting for the growth rate of the nanoscale industry in its economic analysis; and
- Clarifying the research and development exemption.

For more information, visit Advocacy’s Web page at <http://www.sba.gov/advocacy>, or contact Assistant Chief Counsel Tayyaba Waqar by email at twaqar@sba.gov or by phone at 202-205-6790.