



## Episode Title: Trends in Product Sustainability and Circularity -- A Conversation with Kate Sellers

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**Lynn L. Bergeson (LLB):** Hello, and welcome to All Things Chemical, a podcast produced by Bergeson & Campbell, P.C. (B&C<sup>®</sup>), a Washington, D.C., law firm focusing on chemical law, business, and litigation matters. I'm Lynn Bergeson.

This week, I had the pleasure of sitting down again with one of my favorite people on planet Earth, Kate Sellers, a Technical Fellow at ERM, where Kate leads a multidisciplinary team of professionals dedicated to helping companies recognize the business value of product stewardship. Kate is also an Adjunct Professor at the Harvard Extension School and the Indiana University, where she is an instructor in the Master of Science in Product Stewardship. Kate and I spoke on the podcast in December 2020, when we vowed we would speak again in about a year. And over the past year, Kate has seen a decided uptick in several product sustainability trends, including life-cycle assessment (LCA), circular economy programs, and extended producer responsibility (EPR). We discuss all of these trends and more in our very interesting conversation. Now, here is my conversation with Kate Sellers.

Kate, welcome back. I am just so thrilled that we're having this conversation today, and I've been looking forward to it for a number of weeks now.

**Kate Sellers (KS):** I really appreciate you inviting me back, Lynn. It's always a pleasure to talk with you, and especially those times when we get a chance to lean back in our chairs a little bit and to take a broader look at our world in product stewardship. So thanks for having me.

**LLB:** You bet. Well, when we last spoke in December 2020 -- I can't believe 13 months have gone by -- we agreed we were going to circle back in about a year to just check in on where we were thinking things would go. We kicked off then with a discussion of key trends in product stewardship, one of our favorite topics, and at that time, trends included an expansion in regulatory controls, the increasing use of certain software made available to product stewards for safety data sheet (SDS) preparation and predictive tools, and product

sustainability issues. Has that list changed or remained relatively constant over the past 14 months?

**KS:** I would say yes, and yes to both. It has stayed the same, and it's continued to evolve. So in my corner of the world, we're seeing TSCA, TSCA, TSCA [Toxic Substances Control Act]. Whether that's new ways of looking at new chemicals or new ways of looking at the risk assessment of old chemicals in response to some of the Agency's actions, we're actually seeing an increase in demand for TSCA auditing. And of course, I'd be remiss if I didn't mention PFAS (per- and polyfluoroalkyl substances) under TSCA and other regulatory programs. I think beyond that -- and sometimes I like to think of it as just a natural extension of our work in TSCA and regulatory programs -- is the increasing interest and really appetite for action in product sustainability and the circular economy. So the demand for LCA, to look at the consequences of making and using products, has skyrocketed, particularly around greenhouse gas emissions. We're seeing more companies intentionally build and execute circular economy programs. And of course, in response to regulatory drivers and sustainability commitments, more work in EPR. So Lynn, it's been a little while since we've caught up. I'm wondering how that list jibes with what you're seeing.

**LLB:** Almost completely identical from my perch in the legal world, Kate. Really it's kind of astonishing. We are seeing tons and tons of work on TSCA implementation, as you have. We've seen a renewed emphasis on TSCA, and you articulated a moment in on TSCA audits. We're seeing more thoughtful consideration of supply chain implications up and down the road. There's more focus on TSCA from an articles perspective, given that whole debacle we had in January of last year with regard to the implementation of TSCA [Section] 6(h) and the PBT (persistent, bioaccumulative, and toxic) rule and its impact on certain articles.

So yes, we are seeing many of the same trends. I think you probably see more of the LCA side of the equation. We see to some extent a greater emphasis on sustainability initiatives and how can they be made a part of the business program, much more than just commitments to, but actual embrace of, programs designed to achieve product sustainability and circularity. So yes, we're seeing many of the same -- the *em-fay-sis* is on the same syll-able in the legal community.

In my legal practice, I have discerned an uptick in transitioning from a focus on product stewardship initiatives in an abstract sense into how they are actually changing the tone, as it were, in the business community. One simple metric that I've seen with regard to stewardship is just an enhanced number of our clients and others featuring positions, senior positions now, maybe even C-suite positions, bearing the title of Product Stewardship Director or Vice President for Product Stewardship. That metric is just one of many that seem to reflect a growing awareness of the business value of stewardship. What do you see?

**KS:** I think once again, from our different lenses, we're seeing so many of the same trends. The growth, I think, has a lot to do with the increase in regulations that just seems to continue, doesn't seem to be leveling off, but also an increasing recognition of, as you say, the business value of product stewardship, the dangers of noncompliance, and some of these other considerations we've been talking about today, Lynn, where positioning in product sustainability as a subset of product stewardship can actually be part of the brand value. So it is interesting to watch this growth. And for many years, Lynn, you and I have had this passion project of working with the Product Stewardship Society, where the training and the dedication to best practices and certification of product stewards has been such an important part of providing structure for this growth and demand that you're describing.

**LLB:** Absolutely. I think the Product Stewardship Society does a terrific job of recognizing and educating both product stewards and their employers on the business value of stewardship. I see it from certainly a compliance perspective and what are the consequences of not being more mindful of that. But on the business side of the equation, it's equally important, and so much so, that some say that sustainability has become the organizing logic for the 21st century business model. And in that regard, we spoke a year ago about sustainability and a circular economy, two related but distinct concepts in the strides businesses globally were making then and are making now and achieving both. The relationship, though, between sustainability and circularity is complicated. How do you relate the two concepts from a corporate perspective?

**KS:** That is such a great question, and my guess, Lynn, is that if you asked five practitioners, you would get six different answers. But I'll give it a try because there has been a lot of confusion about terminology and scope. Here's how I would look at it. Sustainability, often, in my experience, refers to a company's overall efforts to lighten up the demand on the planet. And these days, that's often focused on greenhouse gas emissions and commitment to net zero. There's a lot of emphasis on counting and reporting in sustainability programs, and sometimes there's a slightly different emphasis in my experience, when talking about the circular economy.

So I like the definition that the Ellen MacArthur Foundation has given us, which is that the circular economy means designing out waste and pollution, keeping products and materials in use, and restoring natural systems. So that definition gives us both the strategy and the how to effect sustainability. And often it's more product-centered, both in the strategy and the tactics. So I think there's a lot of overlap between those two concepts. Sometimes they're used interchangeably, but I find it's useful to make a distinction in the way that I've described.

**LLB:** No, it's very helpful as a defining logic between the two because they are often used somewhat interchangeably, but I don't believe they are. I was also reading the other day that China is on its 14th Five-Year Plan between [20]21 and 2025. And of course, a circular economy is very much a part of China's national priorities.

Here in the United States, we don't really have a national priority that is recognized by all stakeholders. And the concept of circularity and achieving a nonlinear economy is likely largely defaulting to corporate strategies, providing the metrics that are in place to measure and report the value proposition. So although it's not a national priority, there is an awful lot to be said for corporate structures to embrace and promote metrics that will enhance the value proposition of a circular economy that, along the lines that you said, Kate, will realize dividends for decades to come.

Some writers have credited the pandemic with actually accelerating the appreciation of the value and need for a regenerative circular economy. And my take is that the thought is that an economy along those lines builds resilience into the system. And resilience is often thought to be the best defense against future disruptions, whether they're occasioned by a resurgence of the pandemic, extreme weather -- which we're, of course, experiencing in a big way -- or any other type of disruption. What I often dwell upon, given your particular set of extraordinary skills, Kate, is how do you educate business leaders, in business terms, of the value proposition with regard to a circular, non-linear economy? Because it's so transformative from a business operations perspective, I can't imagine that that's easy. How do you do that?

**KS:** That's a huge question, Lynn, and we could probably spend days talking about it.

**LLB:** I know, but maybe just a couple of quick tips, because to the extent I ever have that occasion, I want to take a shot at it, and I want to learn from the best.

**KS:** Well, thank you for your good words. And I'll share what I've learned from my mentors and from my own practice. It seems so often transformation, personal or a business, really just has to start where people are. And so I start by listening and watching to see how we can link the transformation to the values that a person or an organization already holds. And that takes different forms. It can mean considering investor pressures, increasingly, particularly, around greenhouse gas emissions and some of the more visible marks of circularity.

Investors are starting to care. So even a hard-hearted businessperson who's never thought about the circular economy before will listen to their investors. Sometimes the pressure is coming from customers. There have been studies coming out periodically over the years showing how sustainability considerations influence customer demands. And you see that in the activists' cry for action on single-use plastics, for example. Those get a lot of corporate attention for the demand to transform operations.

Also, as you brought this up a moment ago, Lynn, resource limitations -- whether that's of scarce metals or supply chain disruptions around plastics last year -- provide an opportunity or an incentive to think about resilience and how circularity can help to build resilience.

Last but not least, sometimes commitment to a circular economy emerges out of a company's own commitments to sustainability or responsible care, or some other form of allegiance to protecting human health and the environment that may have been framed in the terminology of the last decade and simply needs to be expanded or evolved into some larger considerations. So, Lynn, I can't say that I've got the magic answer or our teams have the magic answer, but transformation, I think, starts with that linkage to "What does somebody care about?" and builds from there.

**LLB:** I completely agree. And to the extent that you are promoting concepts that have transformational implications for corporate America, to the extent that a lot of what we do in the legal profession is also try to urge people to move on, right? To get to a better place, not just because it's the right thing to do and a good thing to do, but also because it might be in the company's best interests and society's best interest to do so from a risk avoidance perspective and engendering goodwill among all of your stakeholders.

Some of those same techniques we've used regarded ensuring consistent compliance, that there are consequences for noncompliance, and all of them are bad: the enhanced notoriety among your stakeholders and shareholders and neighbors and others, not to mention the punitive financial downside of the imposition of penalties, and bad press relations, and so on and so forth. But always starting from a place of where do you find your client and how can you listen to what their concerns may be, but also relate to their role in the value chain are all fundamental to ensuring that we're doing our job correctly and well.

**KS:** That's so well put, Lynn.

**LLB:** We talked about a year ago, Kate, about the European Commission's Circular Economy Action Plan (CEAP). And it's further along, certainly, than circularity concepts are here in the United States. But are there particular trends or initiatives that you see over across the

pond that we may learn from here? Or are any one or more of them better suited for an American economy versus a European one?

**KS:** What a great question, Lynn. And I think that a natural answer to that would be to pull out one piece of that plan and talk about it. But as I think about your question, I think that the real value in many ways is the fact that for all of it, the flaws that it may have, it is a systematic, overarching approach. And I suspect that regulators and consumers in the U.S. aren't yet ready to commit to a plan that's that broad and deep.

But I think that that systematic and science-based approach represented by the CEAP would serve us so much better than the scattershot approach to regulations that we have here in the United States at the federal and state level. So often, for example, in regulations on plastics, just to pick one category of regulation, there's a tendency perhaps to chase the issue of the moment without stepping back and asking, "What's the most effective way to achieve overarching goals?" and then driving toward data-based solutions.

So I can feel that I've inadvertently stepped up on my soapbox, Lynn, but I really do think that we would be better served by looking at our challenges a little bit more systematically, as they tend to do in the EU [European Union]. And that makes me want to turn a question back to you, if I can, Lynn. Because of your work in regulatory compliance, there might be a little bit of an analogy between the question that you asked me and the evolution of both REACH [EU Registration, Evaluation, Authorization and Restriction of Chemicals] and TSCA as precedents for chemical regulations in different cultural and regulatory constructs. So can I turn the question back to you about what we might want to adapt from European practices in chemical regulation?

**LLB:** It's a great question, Kate. The REACH and TSCA regulatory programs are based on fundamentally different concepts, REACH being a hazard-based approach to regulatory controls and TSCA, of course, back in '76 and even through the 2016 amendments, are based on a risk paradigm. A certain level of risk is acceptable, so long as it's not *unreasonable* risk, which is the bedrock principle of TSCA. So the two organizing concepts are quite different, but may to some extent get to the same place, just through a different regulatory approach. The organizing principle with regard to risk may be different, but many of the concepts are the same, and some might argue that as TSCA is being interpreted more presently under the Biden-Harris Administration, there seems to be more of a temptation to base a lot of the determinations on risk evaluation under TSCA Section 6 and new chemical review under TSCA Section 5 on a system that is almost more akin to hazard, recognizing that the risk paradigm seems to have been a little bit eclipsed in some respects, and this is an issue of continuing discussion among stakeholders of all stripes in the TSCA field.

So the concepts are different, but the regulatory systems are aligned. But lacking in the TSCA system is the concept of circularity, although as a stated principle it's not there, but to the extent that some of the regulatory decisions are certainly urging stakeholders to distance themselves from chemicals that might pose unreasonable risks or even reasonable ones, but unreasonable from within a context of a corporate entity's commitment to sustainability and circularity. We all may be moving to some of those concepts, notwithstanding the absence of their explicit reference within the frameworks themselves.

One suggestion I hear a lot is to not overanalyze how one's operationalizing these concepts, that if you set out to achieve a business paradigm that is focusing on sustainability or circularity, that sometimes the perfect can be the enemy of the good. For example, if

achieving circularity is a priority, perhaps companies should start small and investigate very specific objectives, like takeback programs or recycling programs or commitment to manage whatever might be coming out of the municipal and hazardous waste stream better, more efficiently, and more proactively. My sense, Kate -- and you probably see this day in and day out in dealing with your clients -- is there's no one way to proceed, right?

Circling back to what you said, not 10 minutes ago, you listen to your client and then you start from a position that is relatable to it. What advice can you offer folks on this podcast in that regard?

**KS:** You put it perfectly just a minute ago. The perfect is the enemy of the good. So I would say maybe three things to think about. One is, yes, start somewhere in your organization with a pilot. Start with an action. Don't try to build out a massive program and make it perfect to begin with, but start with a pilot program and then collect data along the way. Good intentions will get you only so far. It's important to understand the impact -- financial, on the planet, on sales, with customers, and so on -- to really gauge the effectiveness of those initial actions both in and of themselves and in the context of the larger business and the environmental and social impacts of the larger business.

And I think the third thing, and this may sound almost paradoxical since I was just emphasizing data collection, is to collect the stories. Internally and externally, people like to be inspired. They *need* to be inspired in order to drive an initiative forward. So collecting the stories of where those initial pilot efforts had an impact, where people had great ideas that led to measurable good, can be a really crucial part of building momentum with any new program in the circular economy. Not to mention that those stories can bring an element of fun and excitement that we all need sometimes in our jobs.

**LLB:** Oh, absolutely. And I think that is such a critical concept, Kate, of storytelling. Companies that are really, really trying, but not necessarily in a way that is so visible that community and shareholders and other influential entities wouldn't recognize. So capturing those successes, starting with specific objectives and achieving specific goals and then reporting on that publicly -- whether it's in community meetings or on the website or in shareholder reports -- is just so important to be relatable, to demonstrate a consistent commitment, and then to report out. I can't overemphasize that, because often people do great things, and then it's the best-kept secret in town, which isn't doing anybody any favors.

**KS:** Yeah. So isn't it funny, Lynn, that with your training and your great deal of expertise in the legal profession and with my training in engineering, and essentially what we keep coming back to is human nature?

**LLB:** Yes, absolutely. I really think that is such a critical part of serving your client. You're a fiduciary; I'm a fiduciary. Our goal is to listen, to help, and ensure that our clients are as successful as possible. And so often there's an element of just humanity, of appreciating the other, where they are coming from, and moving them to a better place in a way that they can relate and be successful. So, that emotional quotient is just so important in addition to all the legal and scientific stuff. But also just listening is important.

**KS:** So well put, Lynn. Thank you.

**LLB:** No, Kate, I'm just reporting back what you and I know to be true. When we spoke in very late 2020, we were speculating on how we would be spending the rest of -- or well, the new

year, which was then 2021. So what topic or topics *did* end up taking all of your time last year? And would you allocate the pie differently in 2022?

**KS:** The conversation that we've been having just now has really followed along with how I spent much of the last year, and in fact how I expect to spend 2022. I spent a lot of my time working in TSCA, including audits, and then working with companies in the circular economy. And sometimes those sound like very, very different things to be doing, but in fact, it's the same scientific principles, when you get right down to it. So I have been truly enjoying working with colleagues to take what we have learned as a profession about bringing new chemicals to market and products to market and reapplying that in a different way to help companies achieve goals in the circular economy. So I think that that's going to keep me busy learning, growing, and having great conversations throughout the rest of 2022.

**LLB:** Let's circle back to one of my favorite topics, and that's TSCA. Has the new Administration -- not so new now, as we are early in 2022 -- but the Biden-Harris Administration took over in January 2021. Has the Administration's implementation of TSCA in any particular way surprised you? And I know you mentioned a bit ago that you're spending more time on auditing because the Administration has made compliance certainly a commitment. And I know we've seen an uptick in both information request letters from EPA -- both headquarters and regional offices -- and I think a lot of our clients are much more focused on compliance strategies and self-audits as a consequence. But anything else that has surprised you or your colleagues in the TSCA space as we progress into the second year of the Administration?

**KS:** I would say the sheer energy that the Administration is putting into TSCA has certainly been catching our attention. And you mentioned, Lynn, a lot of the same things that we're seeing in terms of demands from the Agency or expectations of the Agency and how companies have been responding to those. So I would say yes to your list.

I also saw something recently that really caught my attention, and I want to see if it gains any traction. You may have seen this, too, Lynn, but just a couple of weeks ago there was an article in *Inside EPA*. It was called "Planetary Boundary Study Could Spur Calls for Strict Chemical Limits." And it was reporting back on an academic publication in *Environmental Science & Technology* that was basically saying -- and I'm paraphrasing madly here, Lynn -- that we're at or near the carrying capacity of ecosystems for chemical and plastic pollution, and we need to take action as a result. So I've got to go back and read that study a few more times and think about their methods and their conclusions. But what really caught my attention in this *Inside EPA* publication was quotes from an EPA source essentially saying, and again, I'm paraphrasing, that the authors of this study were onto something. And it called for more urgent action under TSCA and perhaps global action as well. So that's pretty -- it's a pretty radical notion, and certainly one that we've heard about periodically since the 1960s and talks about limits to growth. But I want to watch in the months to come whether this idea or some form of it is picked up as a call for even more urgent action.

So I think the more things change, the more they stay the same. And you and I will both be watching in the year to come how the Administration continues to drive the TSCA program.

**LLB:** That's very interesting, that whole planetary boundaries concept, which I am familiar with. It seems to take the concept of climate change and the existential crises that many, including this person, believe we are in, and wrapping it up into kind of a different paradigm, but still getting to the same place of being: we are in exigent circumstances, that the Earth system is

reaching a threshold and that we are pushing the boundaries of what the planet Earth can accommodate.

And how does TSCA figure into that? The new Administration's policies have added an element of -- in my view anyway, has really pricked the ears of the industrial chemical community in the United States. Assistant Administrator Freedhoff's June 30 memorandum -- I know we put a memo out on our website -- identifying some of the organizing principles around the Administration's interpretation of TSCA really set everybody's hair on fire, right?

**KS:** Mm hmm.

**LLB:** The concept of whole chemical, instead of reviewing chemicals on a condition of use basis, the concept of no longer accepting as a predicate that occupational exposures are mitigated by personal protective clothing and equipment that is, in all cases, fitted appropriately, that that is no longer an assumption in risk evaluation under Section 6 *or* in new chemical evaluation under Section 5.

Enhancements to fenceline exposures and enhancements to how do we ensure that we are giving expression to the Congressional principle of protecting vulnerable, sensitive subpopulations and persons who may be disproportionately exposed to chemicals by virtue of being in fenceline communities or just being persons with underlying health conditions. The attention that the new Administration is focusing on environmental justice and fenceline communities as a whole is moving the ball forward in very significant ways. I think because of the changes in these policies, it has slowed the issuance of risk evaluations, but the risk evaluations that *are* coming out are certainly coming to different conclusions regarding margins of risk in what is and is not an unreasonable risk. So I know the new Administration has definitely stepped up the pace and has made TSCA compliance and an understanding of where the program is going all the more important, and if that helps achieving the balance that we need for purposes of a planetary boundaries concept, so much the better. But it is definitely keeping us busy, that is for sure.

**KS:** Absolutely. Absolutely. And not that I want to advocate for delays that completely stalled business, but I think that taking the time during preparation of a premanufacture notice, for example, to think about some of these issues, to anticipate some of the risk concerns and look hard at mitigation early on, is going to continue to be so important.

**LLB:** Oh absolutely.

**KS:** In 2022.

**LLB:** And far beyond is that regardless of what happens in the midterms and regardless of what happens in 2024, the policies and operating practices that are being set into place now will have a very significant impact for years to come. That's why I think the current Administration is trying very hard to get it right, seeking stakeholder input. And we urge our clients *all the time* to ensure that chemicals are properly viewed and are based on science. We urge all of our premanufacturing notices to be supported by the science and really accurate assessments of risk and to help educate EPA as to the value proposition of each of their new innovations. So I couldn't agree more.

You had mentioned, Kate, that auditing was a part of your portfolio. And I know you and I have worked together on due diligence activities for many years. How do you go about



evaluating a potential acquisition or divestiture? But mostly I think this question relates to an acquisition: the sustainability quotient, for lack of a better word, like compliance and trying to capture the potential risk of an acquisition, are mature concepts and relatively well defined. But I know often when we're engaged in due diligence activities, it's much murkier to try to identify and define whether the target of the acquisition really has a sustainability quotient. And getting to the heart of that is really hard, but it's frequently being asked more now in due diligence activities than ever before. Are you seeing that?

**KS:** Oh, we are absolutely. The first wave, I think, was recognition that product compliance could be material in an acquisition. And I would say over the last two years, we're increasingly seeing concerns around sustainability or product sustainability. And the practice isn't really yet codified yet about what that means, but sometimes it pertains to sustainable sourcing, meaning not only are supply chains resilient, but where are the key raw materials coming from? Are they coming from environmentally sensitive areas? Could supplies be interrupted by natural resource limitations, or are there social conditions associated with supplies that really aren't acceptable to the acquiring company? We have also sometimes looked at whether or not trends in sustainability might lead to limitations on the market for certain kinds of products, or the need to reformulate, or the need to change the way products are made or packaged. So, for example, concerns about single-use plastics, could those impact certain aspects of the acquisitions business in a material way? So we keep coming back to this theme, Lynn, of listening and evaluating. And here it comes up one more time of thinking about the materiality threshold, looking at what the acquisition is doing or making and where they're located, and sort of reasoning to what potential sustainability concerns could eventually be a material threat. So it's ever evolving. I think in 2022, we're going to be seeing more of those kinds of concerns in diligence.

**LLB:** Yes, I completely agree. One additional thought -- I know you and I have chatted about this and agree -- is that this elusive concept of EPR is starting to creep into the conversation now that we have two laws on the books, in Oregon and Maine, and a bunch pending in other jurisdictions. They might be focused on packaging and other types of materials in the first instance. But again, I think you would agree it's another driver moving, lurching forward in not a particularly elegant way. But as these initiatives crop up, it is definitely capturing our clients' attention and increasingly just the subject of "What does this mean, and should we be concerned?" And the answer is it means a lot, and yes, you should. Maybe not today, because Oregon and Maine are 2024, or 25, 26. But that's not far if you have to start revisiting your operations in any material respect. Four years down the road is like tomorrow.

**KS:** Absolutely, Lynn. We found when looking at reformulations, whether those are voluntary or in regard to authorization under REACH, that reformulating a product or its packaging is often not simple. It takes time and can cost a lot of money. So however cloudy our crystal balls may be, looking out ahead at some of these requirements and trying to anticipate them really is even more crucial now than it ever has been.

**LLB:** You mentioned early on when we started our conversation, Kate, PFAS. I know we've seen a big uptake in concern with that from a sourcing perspective: "Gee, are any of the materials that we are obtaining from our suppliers, do they contain PFAS?" Any one of 4 to 5,000 chemical substances, as EPA has defined them. And also in terms of remediation, I know you guys do a whole bunch of Phase I, Phase II. How important is that? I mean, is that driving a lot of deals right now, the potential for PFAS latent liabilities or concern with sourcing materials that these are deal killers? Or am I speculating that that's not as big a deal as I think it is?

**KS:** I will say, requests to figure out whether there are PFAS in supplies or products has been increasing. I think a lot of companies with the TRI (Toxics Release Inventory) reporting requirement got their eyes open wide, and now they're realizing that with the potential for additional regulations on the horizon, they've got to start asking the questions now so that they're prepared for regulations or the need to reformulate down the line.

**LLB:** Oh, you're exactly right. And in the EPA-proposed, the TSCA Section 8 reporting rule, and is likely to issue it in final this year. Yes, I think you put your finger right on it, Kate. Right here, right now. TRI reporting obligations, TSCA, or reporting obligations are really focusing on where are these materials coming from? And if I have to report, I might want to revisit whether I need to report down the road by eliminating those sources from my supply chain. So well put.

Kate, you're an Adjunct Professor, in addition to being the exceedingly busy full-time executive you are at ERM. I'm interested in just getting a glimpse of how you calibrate your students. You teach master's students at Indiana University. Are you finding that they are simply focused on a different core set of values these days than students were five, ten years ago, or am I misapprehending the youth of today?

**KS:** What a great question, Lynn. The part about being an Adjunct Professor while I work at ERM, I think that I can make the time because it can be exciting and even exhilarating to work with students on their way up. Not to mention that I learn at least as much as they do. So I teach regulatory affairs for product stewards at Indiana University, and last semester I taught a course called Product Stewardship and Chemical Sustainability at Harvard University. And what I've seen in students is almost paradoxical in the sense that there's a thread of pragmatism behind getting credentials to get a job -- no doubt about it -- or to advance in a career. But beyond that, I see a real dedication to making the world a better place. And as you and I have both seen and dedicated our careers to, Lynn, working in product stewardship is such a great place to do that.

**LLB:** It is indeed. And it's just inspiring to hear that your students are as focused as they are both in the here and now -- and getting a job and maintaining a job are really important -- but also taking the skills that you impart in students -- product stewardship, an appreciation of sustainability and circularity, and making them all committed to achieving a better place -- is just very inspirational. And thank you for all that you do, Kate, and thank you for this wonderful conversation. I just so enjoy engaging with you. You are always very provocative and thought-provoking, and we'll have to do this again next year.

**KS:** Sounds like a plan, Lynn. It is always such a pleasure to sit and talk with you and learn from you. So thank you for this time today.

**LLB:** My pleasure, Kate. My thanks again to Kate for speaking with me today about emerging trends in product sustainability. There is no person on Earth more knowledgeable and thoughtful about these topics than Kate Sellers, and I am so grateful to her for sharing her thoughts with us.

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