



## Episode Title: Chemical Law and Policy-- A Conversation with Karyn Schmidt

Episode Number: 20250425

Publication Date: April 25, 2025

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

This week, I had the real pleasure of speaking with Karyn Schmidt, now a principal at Squire Patton Boggs in its public policy practice after spending 25 years at the American Chemistry Council (ACC). For the many members of the chemical community who know Karyn, her deep understanding of chemical law and policy will serve the firm's clients well. We discuss Karyn's transition to private practice, her work at ACC, and Karyn's thoughts on what is in store for chemical stakeholders now and in the foreseeable future. Now, here is my conversation with Karyn Schmidt.

Karyn, welcome to *All Things Chemical*. I'm just thrilled that we're able to have this conversation today.

**Karyn Schmidt (KS):** Lynn, thank you so much. I'm really glad to be here.

**LLB:** Karyn, you and I have known each other pretty much forever, and many of our listeners know you also, given your prominence in the chemical product community. Maybe for the benefit of the two or three people on Planet Earth who haven't heard of you and your very established reputation in chemical product law and policy, you could tell us a little bit about yourself: your background, your distinguished legal career, and anything else you might wish to add.

**KS:** Okay, I really appreciate that. Lynn, I've been in Washington, D.C., since 2000. During that time, I was at ACC, the American Chemistry Council, for just shy of 25 years. I feel like I've had quite the journey during a wide, wide range of topics just in that 25-year period, which again, 2000 to basically now, and it's been a real adventure. I know you'll remember back in 2000, one of the big areas of importance to the chemical industry was to advance the high-production volume challenge.

**LLB:** Oh yes.

**KS:** Yes, and that's way, way back, and it seems like in history now, but --

**LLB:** It was, Karyn. Hate to break the news.

**KS:** Sure, but that's where we were in 2000, right? There were calls for industry to develop additional basic information on production volume chemistries. Many years of effort went into that to be able to make that work. Obviously, that predated the 2016 TSCA [Toxic Substances Chemical Act] amendments. Just right out of the blocks, when I came in in 2000, that was a significant amount of work for the in-house attorney, since I was in the Office of General Counsel. I started that career at ACC working with the product groups. These have different names, depending on where they live. In Washington, D.C., sometimes we call them consortia, or panels, or coalitions, but in all those cases, it's just individual companies that are representing a product, a sector, a specific chemistry, a plastic. They have common concerns and common interests that warrant coming together as a group of competitors to advance their advocacy needs.

I think my head count is -- I've worked for probably about 100 of those groups, providing legal counsel and support. Then in the very early days, I'm ashamed to say I actually have favorite chemistries, Lynn, but I do.

**LLB:** You sure you want to admit that publicly, Karyn?

**KS:** Certain chemistries have a soft spot in my heart, so when I came in, I started working, again, right out of the blocks, for phthalate esters -- which are used to make vinyl flexible -- and found the chemistry to be completely fascinating. The way it works is fascinating. Its uses are fascinating. It was also under a lot of scrutiny at the time. Back in the early 2000s, there was, I would call it, perhaps not an explosion, but a growth, acceleration of product challenges at the state level, and also we used to say at the retail level, since there was more and more interest. Walmart was starting to become a bigger and better player in understanding its supply chains and wanting to deliver on improved product performance, including sustainability features for its products.

That evolution also started to occur. Of course, as we all know, that increased pressure in the states, and the risk of having patchwork regulation, is one of the precipitating factors for those 2016 TSCA amendments. Yes, you heard it here. Yes, I have favorite chemicals. While at ACC, I had the opportunity to work at the ground level, the development of our sustainability program at ACC, which was fabulous. That started, again, a kind of "relation by retailer" regulation, as it were -- I'm putting air quotes on that -- by codes and standards, by consensus standards and non-consensus standards, by players who are certifying bodies, like USGBC, the U.S. Green Building Council. All of those different things.

I supported our Plastics Division at ACC as well. There I got to have even more favorite chemistries and learn all about polymerization, a really fun opportunity there. I've done a good chunk of work on Proposition 65 in California and the DTSC [Department of Toxic Substances Control] Safer Consumer Products Program. These are all issues where if you're a chemical manufacturer or you're a consortium, and a chemical you're interested in or a material you're interested in gets entered in one of those programs, then evidently there will be some interest in making that experience as not unpleasant as possible. Let's say that.

**LLB:** I know you started your career in private practice, so to some extent your transition to private practice now at Squire Patton Boggs might be a little bit of a coming home. I also note with interest, Karyn, that in 1995 you had an article published entitled “Rohm & Haas Was Right: Recovery of Government Oversight Costs in Private Party Response Actions.” Excellent article, by the way. But it tells me that you may have begun your legal career in matters other than TSCA and chemical product law and regulation, because this is all about Superfund [the Comprehensive Environmental Response, Compensation, and Liability Act, 1980], and I began *my* career in that, and whenever I hear Superfund and cost recovery actions, the theme from *Psycho* resonates in my head. Did you start out in environmental law? And has this always been your calling? And what attracted you to product law?

**KS:** You are spot-on, Lynn. I started in private practice in 1992 in Charleston, West Virginia, going to work for an environmental law firm that was based in Charleston.

**LLB:** Yes, a prominent one.

**KS:** I had incredible mentors, worked for some great attorneys. The firm did a significant environmental portfolio for its chemical company clients. It had others, of course, but I was incredibly lucky as a junior attorney to be able to get what I can only characterize as kind of a perfect training platform to learn environmental law. There were issues running the gamut from PCB [polychlorinated biphenyls] contamination along natural gas pipelines that needed to be remediated, to air, wastewater, permitting, and enforcement issues. Again, it was a great opportunity to learn. You’re right in calling out Superfund. Again, back in the day, there was a massive amount of work on a variety of Superfund sites all over the country dealing with not just doing the routine litigation, but also getting the parties to come up with an allocation structure that they could all ultimately agree to, and that was no small task. Many, many, I suspect young attorneys during that time spent many, many hours working on Superfund. And no, it is not super fun, Lynn. It’s just, I can’t --

**LLB:** Super fun!

**KS:** I cannot let this opportunity go by without that old, old joke.

**LLB:** It is so true, and it’s still -- to me the chemical product area is just fascinating. Not just the United States law, and policy, and regulation, but scientific innovation and chemical product law globally. It’s just such a hot area, and it is just fascinating, given the intersection of law, science, and public policy. I’m glad we both migrated to areas that we feel passionate about.

Working as a legal professional at a trade association strikes me, Karyn, as just very, very challenging. My sense is that it requires an extraordinary amount of people skills, having the relentlessly positive can-do attitude that you have always exhibited. You’ve got this great way with people. You have a fantastic sense of humor. You’re excellent at building consensus among groups. A lot of your practice has been, as you correctly noted a few seconds ago, not just individual chemical companies and sorting their issues, but building consensus among coalitions. How have you honed your problem-solving skills over the years, and how are they benefiting clients now in the private sector?

**KS:** I love that you talk first about consensus building, Lynn, because that is probably *the* single most important skill for somebody who’s working inside a trade association, either as an attorney or a staffer. Trade associations exist to serve industry, they exist to their members, who are paying dues and who are seeking high-quality and effective advocacy. Those companies do not necessarily have the same viewpoint with respect to objectives -- ultimate

objectives -- what success might look like, timelines, and all those intermediate decisions about who to talk to at the agency, what argument to make, what evidence to collect, or what information to be generated, right? All of those areas have to be worked out with the companies that make up the group that are ultimately making those decisions. It is a task that requires a lot of patience, a lot of listening, and a lot of creativity where one or more companies do not agree on a particular path forward.

The reality is, I hate to say you're stymied, because that's a golf term, but that's a real outcome if you cannot come up with a path forward that two companies can agree on. It could be more than that, of course, but it's not uncommon. It's a slow process. Again, it requires a lot of patience, and a lot of listening and ideas and suggestions for paths forward that may be different than what are already on the table. I would say, Lynn, the companies themselves often give really terrific advice and insight, and taking time to speak to companies directly about their hopes and dreams can be incredibly effective. It's not just a function of convening with the group and having a call; it's taking the time and providing the TLC (tender loving care) to individual companies to really understand what their objectives are, and what they might be open to, and what's off the table for them. That's an additional layer of investment of time that's often not seen.

**LLB:** No, I completely agree. We've got a business group over here where we manage about 25 different chemical consortia. That human focus -- trying to understand the individual, the psyche of the company, how it blends with -- or not -- with views expressed by others in a group -- it takes an incredible amount of time: sympathy, empathy, really just working issues in a way that achieves a positive outcome for everyone. You're just so well suited to that, Karyn. I always admired that about you as just a human being and a problem solver and a lawyer. You have to have those skills, or it just doesn't work.

In that regard, I have one question about now that you are out of trade association work and in a private law firm. Given your experience with trade association culture and chemical product law and regulations, do you have any thoughts for our listeners who are members of trade associations now on how to optimize their trade association memberships, not just at ACC, but in any group setting? Any thoughts just looking back on, maybe we should, when we start groups over at ACC, or anyplace else for that matter? Some how-tos for optimizing just the group dynamic, because it really is different than representation of a company by a single advocate, right? It's just a very different dynamic. What thoughts do you have?

**KS:** It is, Lynn. To get one of these groups started -- they will often come together because one (or usually at least two companies) sees the potential for an industry-wide effort on whatever that particular topic is. How do they see that? In some cases, the companies have already done their road mapping to add all their different memberships, all the places they participate in various trade associations. They've already done some thinking about which of those trades is best suited to advance whatever the new issue is, the particular new issue. Ideally, that assessment has already happened before the companies start convening themselves to consider starting a new effort, and they have got a well-defined rationale for why they want to start a new group, where they want to start it, what they want its mission to be, and by the way, when that mission is accomplished, whether the group is done and can sunset, or whether it's going to turn into something else.

That whole exercise always starts by identifying the problem statement, the solutions that are desired, and doing some additional front work to understand who are the other stakeholders who are making other arguments in that area, what coalition partners are available or desirable who should be included in the discussions, what resources are needed

to accomplish the objective, and the timeline. That's the preliminary work that really helps get these groups off the ground as quickly as possible and keeps them really focused on what they're trying to achieve. One of the hardest parts of this effort, Lynn, is getting the right people at the company at the table. I'm so glad that you teed that up.

Very often, the effort requires different people at the company. There are certain efforts that require toxicologists. They may require an epidemiologist. They may require an economist. They may require people with very deep regulatory experience in a particular area. As we saw, with the risk evaluation rules under TSCA, Lynn, we needed industrial hygienists to start helping -- exactly -- and that was a little bit newish in that space. But all those people -- all those different specialists -- help inform pieces of the overall package, and often they will need to talk to each other, but of course all of that has to be wrangled. You need the right people in the right places, and then there's the big picture, so often the technical specialists will convene with each other and not the larger group, but still there has to -- those groups have to inform each other.

There's a lot of work for the support staff, the support team, consultants, lawyers, professional staff to ensure that all that information is appropriately flowing. One of the things I think you don't want to have happen is have experts convene themselves and get so much distance away from the mothership that you lose that flow, you break that flow. That's important. I would say the single most important thing for any group when it's convening -- the absolute single most important thing -- is that problem statement and the objective. What do you want to accomplish? What's the problem? What's the opportunity? What do you want to accomplish? Ideally, that is explainable in a sound bite. The old elevator speech?

**LLB:** The elevator speech, that's right. What are we doing, and how are we going to accomplish it, right?

**KS:** Right, right. We know we're going to have -- for trade associations -- they have different advocacy venues. Like everything else, a complex toxicological argument may not be the argument that's to be delivered to a particular senior official, let's say, at EPA [the U.S. Environmental Protection Agency]. Some thought needs to go into what is the high-level message? What is that elevator speech? Getting that right out of the blocks is incredibly helpful.

**LLB:** You're now a principal at Squire Patton Boggs in its public practice group. Maybe you can tell our listeners what exactly you are doing and will be doing in the months and years ahead.

**KS:** I am -- since I'm in private practice, I am doing what the clients are interested in.

**LLB:** Whatever I'm told to do, that's what I'm doing.

**KS:** That's also the answer at the trade association. Squire has a terrific public policy team. We're very well known in the D.C. area. I think many of us remember Patton Boggs, right? Very well established. One of the things that this firm is very proud of is it's got a highly integrated public policy practice with its legal practice. I fully expect to be doing both legal work and things that might be traditionally considered public policy work in a really nice, seamless, integrated way. Certainly, plenty of other firms do this to varying degrees, but this hits your point that you made earlier, Lynn, which is one of the things that's so fascinating about this practice area is the crosswalk and the intersection between science, law, and policy, so I'll have the opportunity to continue to work in that space.

**LLB:** Excellent, and you'll be doing both. Here in Washington, public policy kind of connotes a set of skills and work areas that are sometimes associated with, but sometimes decoupled from, legal work. You'll doing both presumably, and a bunch of other stuff as well, right?

**KS:** Right, exactly. Really feeling not to have to pick cereal or porridge, right? I get to have both.

**LLB:** You don't have to choose among your children, right?

**KS:** That's right.

**LLB:** Given the time in which we are living, the hot topic right now is tariffs and trade. What are your thoughts on those issues as it relates to the domestic chemical community?

**KS:** Yes, today, on April 8, tariffs are definitely top of mind, probably for everybody who's listening, or even in the next couple of weeks. One of the things that's really interesting in the evolution of TSCA, but not just TSCA and chemicals management writ large, is that there is significantly more interest in really understanding alternatives to chemicals, where those alternatives come from, whether they're available. When the industry first really started thinking about alternatives assessment, it was really a green chemistry exercise first. But over time, the concept of what is not just technically feasible, but what's available, and what does "reasonably available" mean is now very different. We've seen that concept really collide with the supply chain shortages from COVID, and now thinking differently about global supply chains and security issues.

We have this overlay of tariffs. Certainly, again, in the TSCA space, there's a question of if there's an alternative, but it's only available from China, is it really available? That might've been, the answer might be no because of national security, but it also might be no because of tariffs, right? At what point does it become unreasonable to ask someone to substitute with something that is 3000X, the replacement cost? The tariff situation is introducing a variable, and it's also introducing some uncertainty because none of us knows how long the tariff strategy is going to play out and what that will mean, not just for supply chains, but what that will mean for the costs of various items along those supply chains. It's an interesting issue. It's not new, but it's bigger today.

**LLB:** Absolutely, and speaking of uncertainty, the element of tariffs and what reordering the world's economy will mean for the domestic and international chemical community are, of course, big unknowns. Another is something near and dear to your heart, Karyn, and that's TSCA, EPA's implementation of the Lautenberg Act from 2016. It seems to me the uncertainty fraught by the new administration revisiting many of the core principles of the Biden Administration's revisiting of many of the principles of the Obama Administration makes for a dizzying level of uncertainty with regard to chemical regulation.

All five risk management rules are in court right now, and how those issues will be resolved judicially. If they will be resolved judicially remains uncertain. What are you telling your clients in trying to navigate these very uncertain times and planning for the future? Is that even an option these days?

**KS:** It has to be, so businesses have to -- they have to continue. They're in business for a reason. It's all about not just how do you prepare, but how do you gird your loins and get through this point in time? One note, of course, is -- and you wrote a really nice piece on this, Lynn

-- one note is that for environmental legislation to work over the long run, it has to be settled, durable, predictable, as much as possible, but ideally, the legislation is bipartisan, and there's support for it and support for implementation. If legislative whipsaws continue, in addition to agency whipsaws between administrations, then the question becomes, where's the end to all of this?

At what point are any of the courts, whether it's the court level or otherwise, able to resolve any of these issues? One -- I wouldn't call this a concern, Lynn, but it's just an obvious statement. The courts take a while, and there are a lot of open questions about TSCA implementation, and not all on the table in front of any one reviewing court at this point in time. If you think about the timelines there, there's still an awful lot to come, just in the courts, to help stakeholders understand what the law does or doesn't mean.

How do you get ready for all of this? Put the request in to understand your use. Do the work, understand and analyze what's working and not working from a regulatory implementation standpoint. Where can there be creative changes or adjustments made, either due to staffing, due to funding, to manner or method of implementation that would streamline something, provide a better result? And be prepared to bring those creative solutions forward and make those suggestions, certainly to the agency.

Even at the beginning of TSCA implementation back in 2016, part of the mantra for the regulated community was "Know your supply chain, know your uses, have your exposure data ready, and be ready to have that dialog with the agency and provide that exposure information to the agency." I don't think anything has changed in ten years. It's just as important now.

Going back to the last topic that we were discussing on availability and viability of alternatives, knowing what we know now, having gone through some risk management rules, really doing the homework up front to answer those questions about alternatives is incredibly important. If something is not available, or there's a fractured supply chain, or it isn't feasible, or the trade-offs will create flammability concerns -- as again, we saw in some of the more recent risk management rules -- those are all things that need to be brought forward to the agency well before the end of the process. There's definitely a lot that companies can do themselves to improve the flow of this entire process.

One area that continues to be the most challenging, which is, I know, near and dear to your heart, is the new chemicals program. There, it is very challenging to provide, what did you say before, Lynn? Empathy? Sympathy?

**LLB:** Managing expectations on the client firm in that area is proving very challenging.

**KS:** Right, right, so --

**LLB:** But you do, you have a lot of handling there.

**KS:** That's very stressful right now, and there may not be a near-term solution that's going to magically start fixing the throughput issue. Of course, there are other issues there as well. So for new chemicals, a little bit of patience, maybe a cookie, warm glass of milk, exactly.

**LLB:** And on both sides of the aisle, right? Because our colleagues at EPA, this is a very stressful time for government workers writ large at the federal level, so it's important to be very empathetic to what *they* are going through, in addition to providing counsel and managing

expectations realistically about what can reasonably be expected to get from the agency during these times. That is definitely proving to be something that we are constantly communicating to our clients. It's tough. The 90 days has never been a realistic expectation for a new chemical, so if it's a year or a year and a half, build your business plan accordingly, right? "Be grounded in reality" is what we constantly urge clients to be mindful of, and I'm sure you're doing the same.

**KS:** Of course. I usually will say, what are the ground conditions, right? You can't change the ground conditions overnight. They are what they are. You always start with reality, so that's good counsel, and I'm sure companies are hearing much the same.

**LLB:** Indeed. Beyond the uncertain world we live in with regard to TSCA implementation, what the Trump Administration is likely to do -- we're looking, for example, at a reworked risk management framework rule, maybe as soon as June, at least that's what I'm hearing. You might be hearing something else, urging clients to be very vigilant and participate as appropriate, both through trade associations and through their own advocacy initiatives is kind of the best way to prepare yourself for the new normal, if that term can even be used.

But in addition to the uncertainty brought about by the tariff situation right now and the uncertainty brought about reimagining TSCA implementation, what other issues are you focusing on, both now and later this year, that your clients can be expected or should be expected to be focusing on? I know one area that we're a little bit uncertain about is the resurgence of state initiatives and how that might impact commercial operations and business plans. What do you think?

**KS:** I agree, and this is almost inevitable with a federal deregulatory effort. The pendulum swings to the states. Many of the states are already examining options to preserve programs that they like. Yes, I think that that's exactly right.

Broader picture, big picture, the Trump 2.0 has not been shy about the fact that it is pursuing a very aggressive deregulatory agenda. Much of that agenda focuses -- not all of it, of course -- but much of it focuses on environmental laws. We've seen a number of those sweeping announcements made. One of the big challenges for this administration will be the greenhouse gas endangerment finding and how the administration plans to go about that. That announcement already came out, but what we don't know is how the administration's going to tackle that, or whether that is going to hold up in court or not. Many, many questions there.

Interestingly, in some instances, industry sectors are enthusiastic about potential regulatory roles, particularly if those reduce costs while continuing to allow them to operate and manufacture sustainably. In other cases, industry may have a deep investment in a current program and not want it repealed. I'm using Industry with a big I, but there are many different players who have many different objectives, and some actually like the system the way it is and want it to continue. I think we'll continue to see quite a bit of advocacy along those fronts.

I would suggest that advocating for a completely new regulatory system in this environment would be an extraordinary challenge and require exceptional justification to be able to have a discussion with EPA or other agencies about how to move forward. An exception to this is FDA's [U.S. Food and Drug Administration] Human Foods Program. That appears to be moving forward apace.



**LLB:** Without Jim Jones.

**KS:** Without Jim, one of our long-time colleagues, yes. But it will be very interesting to see what the scope of that program is. I've been personally interested in watching whether FDA makes any effort to try to align that program with some of the TSCA risk evaluations, since EPA has been excluding food and food contact from the TSCA risk evaluations. But that's the only one that really comes to mind, Lynn, which is a big step forward in the regulatory agenda that's a little bit of an outlier.

**LLB:** It's a very interesting topic, and I think we are all kind of moving in that direction. Jim's going to take many of his risk assessment, risk management principles from TSCA and embed them in the FDA context, the Human Foods Program. That may well be the endgame here, but since he stepped aside a number of weeks ago, it's a little bit fuzzy on where that's headed.

**KS:** That's right.

**LLB:** Let me ask you a question about PFAS [polyfluoroalkyl substances]. Are you deeply engaged in some of those issues? Because the PFAS area is so complex with regard to science policy issues, regulatory issues, legal issues, tort matters, and I'm sure your firm does it all, but how are you parachuting into that topic?

**LLB:** Right. I've looked at a number of issues that relate to cleanup of PFAS, first of all, and then some additional issues which, again, have to do with grouping and which chemistries can be grouped together. Again, not a new issue there. One of the things that I think will be very interesting going forward is whether at the federal level, the federal government wants to update its comprehensive approach to PFAS. Will it be doing that in a way that straddles different statutory programs? That's on the watch list.

I would also think that the incoming administration may also want to update the plastics -- basically its plastics roadmap -- as well. There are some cross-linkages between the two issues, so a good opportunity going forward to think about how those connect. I would be remiss without mentioning that some of the next chemicals that might go into TSCA risk evaluations are also tiebacks to some of the legacy -- polyolefin plastic -- portfolio. It is worth thinking about that as a collective -- and that's across departments, by the way.

**LLB:** Yes, absolutely. That's a good point. It's a very good point. Last question, Karyn, and I always ask distinguished attorneys and practitioners such as yourself for your thoughts on how best to coach new entrants into the legal profession, starting their practice and really wanting to focus on chemical product law or subdivisions thereof. What words of advice do you have for them?

**KS:** A great question. I would say for this area -- this practice area -- it's critical to be really interested and really curious in the science. Nobody is expecting a new lawyer to be a scientist. Sometimes they are, but not always, right? So you have to learn by osmosis to be able to do a decent job. I think that's the case for pretty much any lawyer. You have to learn a little bit about the area. Putting the time in to be curious about the science, learn the science, and spend the time talking to experts in an interdisciplinary manner. You're going to learn how to do a great job by talking to engineers, and talking to toxicologists, and understanding the issues from where they see them, and not just ensconcing oneself with other legal practitioners.

Having all the perspective, all the insights is incredibly important, so I would definitely encourage new attorneys to do that. As always, taking an area, putting the time in to really understand it, is important. Understanding regulatory frameworks for chemicals at the beginning is really important, whether that's learning FIFRA [the Federal Insecticide, Fungicide, and Rodenticide Act], or learning TSCA, or learning Superfund, as we talked about before. Understanding about what's the legislative construct, what's the policy construct, and how does it approach the specific issues that are attendant to the chemicals that it covers, or the products, or the materials? That knowledge -- and it can't be gained all at once. But that's, I think, really what helps inform, at the end of the day, not just legal analysis, but really good policy advocacy, is to understand that the solution that you might need is in another framework.

**LLB:** Mm-hmm. Good advice. I think you probably share my view that you don't need a science background to support a legal career in chemical product law and policy. I mean, it helps for sure, but I was a philosophy major. I don't know what you majored in, Karyn, but mine sure wasn't in science.

**KS:** I completely agree with you, Lynn. It's the curiosity and the willingness to learn that are important, and for those of you who are wondering, no, you do not need to learn math. There are plenty of people, smart people out there, who can decipher the equations, so it's okay.

**LLB:** And they *like* that stuff.

**KS:** That's right.

**LLB:** Those of us that don't like that stuff, you can get that stuff. Exactly right.

Karyn, this has been great. I have just so enjoyed learning more about your practice, where you came from, and your approach to problem solving, which I have always admired. You're always spot on. For listeners who want to know a little bit more about Karyn and get a sense of your writings, and speeches, and background, you can be found at [www.squirepattonboggs.com](http://www.squirepattonboggs.com). You have some very nice information there about your practice and your contributions to your new digs there. Thank you so much for being with us today.

**KS:** Thanks again, Lynn.

**LLB:** Thanks again to Karyn for speaking with me today regarding her thoughts as a trade association lawyer, transitioning to private practice, and the state of chemical law and policy.

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