



Episode Title: The Future of Chemical Data Intelligence -- A Conversation with Greg Gartland, Chief Executive Officer of 3E

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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 Greg Gartland, Chief Executive Officer (CEO) of 3E, to discuss 3E's business offerings, how it defines its place in the very competitive world of chemical information management, the role of artificial intelligence (AI) in this space, and trends Greg sees driving growth in chemicals, product stewardship, and sustainability. Now, here's my conversation with Greg Gartland.

Greg, thank you for joining *All Things Chemical*. We're just delighted to have you today.

Greg Gartland (GG): Thank you, Lynn. I'm a big admirer of the podcast, so honored to be invited to it.

LLB: You have much to say, and I know our listeners are very interested in hearing more about your role as CEO of 3E. In that regard, maybe you can tell our listeners a little bit about yourself and your very, very impressive background.

GG: Sure thing. I have been in the information services, the data and analytics space, for almost my entire career. Just out of even undergrad, I started enabling financial institutions to better understand their markets and their customers. I took a slight detour after getting an MBA (master of business administration) to work for a few years in strategy consulting, where I did get to work on multiyear projects with some manufacturers, like DuPont and Altria. I got a little bit of a taste for the challenges of operating in a very complex global compliance-led environment with those companies.

Prior to 3E, I spent six years as Chief Product Officer at S&P (Standard & Poor's) Global's Market Intelligence Division. S&P -- while known for its legacy of financial information -- the fastest growing part of my remit there, my portfolio, was around sustainability and

supply chain data sets and really helping corporations continue to digitize their decision-making. What I've seen over my career is typically corporations lag the financial institution space by a couple of years. That gap is narrowing, but the direction of travel certainly has been very clear for a long time in terms of the real world that produces goods and services. That trend around digitization and driving decisions with best-in-class data has only been accelerating since I got in the business 25, 30 years ago.

LLB: Speaking of S&P Global, you oversaw, as you noted, product lines and sustainability solutions in the Market Intelligence Division. Maybe you can share with our listeners some of the more memorable issues that you faced in this role and what are key sustainability solutions you think our listeners may find useful?

GG: Sure. Lynn, what's been fascinating to me throughout my career is there are data sets for so many different elements of the global economy and society. My industry and my world have been littered with entrepreneurs that have decided to try to digitize, curate, collect, and deliver data on all sorts of real-world processes and flows. At S&P, I saw firsthand how digitizing these data, connecting different data ecosystems, could accelerate sustainability outcomes.

One memorable company that I was fortunate enough to be involved in acquiring was a business called Panjiva. They had a platform for aggregating millions and millions of bills of lading. These are the inventory list of what's in maritime containers and maritime trade. Aggregating these millions of bills of lading gives you a really interesting picture on maritime supply chain flows. And you can turn this, what is sort of really, really messy, unstructured data into intelligence that can help businesses drive decisions. Most likely, if there's a process, a workflow, a market, a country that our customers and your listeners are doing business in, there's likely a data set that can help them better inform their decision-making. That's obviously very key, given the competitive environment that all of us are operating in.

LLB: Greg, you have a super impressive background, and all of your prior jobs and educational credentials prepared you well for being in the position you're in, and that's CEO of 3E. We are one of your customers. But what I find very interesting -- given the fact that we're very data-driven here at the firm and in our consulting firm -- what brought you to 3E? Did they pick you out of a lineup, or were you driven to it given your background? It seems like just a perfect marriage of interests and skills, but maybe you can tell our listeners a little bit how you found your way to being top dog over there at 3E.

GG: Sure. Sure thing. I was drawn to 3E really because there are very few businesses that offer a chance to make a tangible societal impact -- protecting people, safeguarding products, which is really part of 3E's core purpose -- while also building a world-class data and technology enterprise. When I looked at the company -- did my own diligence -- I saw a business with really terrific people, a blue chip set of loyal customers, well-regarded solutions, but one that maybe had been a little bit underinvested in. The market was asking to do more with us, and do more with 3E, and drive more innovation. I also happened to know some of the investors in the business from a prior life, in a prior role. The moon and the stars really did align in this case, and it's been a terrific experience over the last three and a half years.

LLB: You joined 3E in, I think, the first quarter of 2022? I know one of your stated plans was to expand 3E's value proposition, both to its customers and business investors and partners.

GG: Yes.

LLB: In that regard, I noted and we chatted briefly before, you've made some very targeted strategic acquisitions since you joined in 1Q 2022, and perhaps will consider acquiring other entities, but what business sectors does 3E principally serve? And what are your business priorities going forward as we approach the end of 2025?

GG: Sure. As all your listeners will know, Lynn, what's interesting about 3E and the space we're in, the chemical industry impacts so many other industries, right? Every part of everyday life is impacted by chemicals, so 3E's primary value lies in providing regulatory and chemical data and expertise, which are needed by virtually every industry that either makes or sells any product that uses chemicals or that has some kind of chemical regulated substance in its facilities as part of its production processes. Our work spans from chemicals and pharma to manufacturing and retail. In those, we enable use cases around product stewardship and compliance, workplace safety, and supply chain transparency and communication, which is certainly becoming a bigger part of what we do and what our customers are trying to sell for.

LLB: I couldn't agree more that the chemical space -- both here in the United States and globally -- is just incredibly diverse, complicated, and with each passing day getting more so. At least that's my take, Greg.

GG: Absolutely, yes.

LLB: Your team is terrific. The products and services that 3E offers help us be better professionals. But this space is so incredibly, intensely competitive. Have you been able to identify priorities for the next year, let alone five years, given the complexity of the space, the tsunami of regulatory initiatives and policy initiatives in every major business sector affecting chemical production and distribution? Is there any way you can give us confidence that your projections will be sound and able to be satisfied, given just growth in the space and the complexity of chemicals in every organized authoritative body?

GG: Sure. Yes, it is a lot. It's keeping us all very busy. Our big priority is to remain the most trustworthy provider of compliance and sustainability intelligence to our customers, and to really make all these years of data and curated intelligence that we've amassed more accessible. I hope we'll get into AI a little bit later in the conversation, but the advances in leveraging AI through our own tools, through our customers' platforms, delivering that content in new and innovative ways, surfacing new insights for our customers that have really been previously very difficult to surface. Those are the big priorities on the roadmap. It's a really exciting time to be in business, to be honest. It's certainly, in this industry, the convergence of the regulatory complexity that, as you alluded to, is only really increasing, combined with technology, really makes it quite a dynamic space.

LLB: You mentioned artificial intelligence, and I *did* want to touch upon that, because that's seemingly all that we're all talking about these days. What role do you see in your very rarefied view of being CEO of 3E as playing in the EHS (environmental health, and safety) and sustainability space? In particular, what should environmental, health, and safety professionals know about AI that will help them do their jobs better and make them smarter and more efficient professionals?

GG: I think -- it's certainly very apparent that AI is the most significant and transformative innovation since the Internet. As we've been talking about, as regulatory compliance

becomes increasingly complex, we don't see regulatory compliance teams getting a lot more budget to hire tons of more people. So leveraging technology tools inclusive of AI holds great potential to accelerate their productivity and agility to enhance the business outcomes that they're driving. Obviously, the chemicals industry is facing some headwinds, certainly in the commodities space, and so companies are looking at every penny that they spend and looking for ways to become more efficient and more productive.

But I would say there are significant risks and challenges with AI adoption. Companies are at very different points in their adoption curve. In EHS, being such a critical workflow for all of these companies, AI's power is 100 percent dependent entirely on the sort of data trustworthiness that underpins the AI, and really, AI models are only as reliable as that intelligence. I think it may have changed now, but I saw a statistic not that long ago -- within the last 90 days -- that something like 30 percent or 40 percent of the data that were underpinning the large language models that are off the shelf was from sources like Reddit -

LLB: -- That's a scary thought!

GG: Yes, it is. What we've really been focused on within 3E is to deliver the curated, interpreted data that our 200-plus chemists and toxicologists -- and we have veterinarians on staff, and we have 20 Ph.D.s on staff -- all of that curated data is what's backing up the AI that we're delivering for our customers. I think for EHS professionals, making sure that they understand what is underpinning any AI solution -- whether it's one that's homegrown or through a vendor -- is pretty critically important.

LLB: You've gone into an area that I want to explore a little more with you, Greg, and that is -- as a lawyer, I'm very, very mindful and appreciative of AI's enormous potential to make our role as advocates and counselors better, more informed, and more efficient. Our clients are always asking us to be as efficient as humanly possible, and accessing quality, reliable, verified data enables us to do our job. But given some of the limitations that you've alluded to -- Where are these data coming from? How have they been authenticated and validated? -- any decision that we as counselors make, particularly in the area of chemicals, where data reliability is pretty much the whole ball game. We interpret it and apply it to particular fact patterns, but at the end of the day, the reliability of those data really is paramount. What assurances can you give customers, 3E supporters and stakeholders, and others, that the data that you are providing to us are authentic, reliable, and verifiable?

GG: Yes, that's a great question, and I think it's one that whether legal counsel or other experts that are using AI absolutely should be attuned to. It is a valid concern. As you said, Lynn, the interpretation layer -- and that curation layer -- we've been doing that for 35 years, and we've found hundreds of errors within regulatory outputs that we've corrected through our processes. So even if you maybe pointed AI models at even very well-regarded regulatory websites, you might not be getting exactly the result you want.

Then, as you know, regulations are super complex. All the multi-jurisdictional considerations, multi-language, you've got translation issues, you've got structuring issues. We base our AI, like I said, on all of these data that we've curated for years and years. We've grounded our models in being validated, guided by our domain experts. To ensure transparency, auditability, we source -- in our AI outputs, we point to the sources of content that are driving those results. Ultimately, they need to be -- for a lot of the use cases, regulatory defensibility is important. I think this is an area that will continue to evolve in our space, but in the workflows that we're serving, 95 percent accuracy is not good enough. In

many of the workflows we serve, these can have big environmental impacts, big human impacts. So 99.999 percent is the standard. And that's where we're pointed at.

LLB: Yes, data reliability just has so many implications, and so it's good to know that you have such a high goal there, 99.9 -- what is it, four nines or six nines? That's pretty darn high. How do you manage extending into areas that are becoming very globally relevant? I know one area that we've been spending an awful lot of time on -- in addition to PFAS [per- and polyfluoroalkyl substances], of course -- is microplastics, because in recent years, microplastic issues, detection, calibration, regulation, policy initiatives are very much at the forefront of regulatory and science policy-driven conversations, here and globally.

GG: Sure.

LLB: How is 3E advising clients in preparing for measures to address microplastics at both state, federal, and international levels?

GG: You alluded earlier to some of the acquisitions we have done over the past three or four years. One of the companies we acquired is a business called Chemycal. They had amassed a really highly refined data set of news articles related to chemical regulation. What was really interesting about that company is that over the years, they had provided all this metadata on top of the news. For example, every article that they captured over ten years was cross-referenced with Chemical Abstracts Service® (CAS®) [Registry] numbers. So you could look at an article, see -- okay, what are the actual chemicals and materials that this article may reference? And you could cross-reference it to CAS numbers, you can cross-reference it to different, whether it was a European Union (EU) REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) regulation, or TSCA (Toxic Substances Control Act), or Prop 65 (California's Proposition 65), and so forth.

All of that metadata allows our customers to horizon scan for topics like microplastics, which -- I was doing a search in our database just this morning in preparation for this. In the last month, I came up with a dozen hits on microplastics articles, and I think in fact, just at the end of September, the EU came out with a new regulation on plastic pellets. There's really quite a bit of activity. I think, EU REACH also has a public comment period that's ending I think in the next week around microplastics. I think right now we're tracking seven or eight states that have enacted or proposed bans around intentionally added microplastics. Absolutely, this is an area, as you mentioned, like PFAS, that continues to have regulatory actions and regulatory activities.

It puts a huge emphasis on manufacturers to be responsive, to anticipate regulatory change so that they can work all the way upstream, all the way from R&D (research and development) down through transportation, import-export, and through to end of life around their products, because it's very costly if you're caught off guard and not keeping up with those regulations. Think about that full supply chain all the way from R&D and manufacturing, through to end of life circularity. Getting something wrong can be extremely costly, whether it's fines or just the inability to sell products in markets that are appealing.

LLB: I couldn't agree more. That's what we are constantly urging our clients to be mindful of, that if you've got a new product you're thinking about that's at the R&D phase or trying to ensure that it's going to be a welcome contribution to the business portfolio, you need to look at it at all levels in every major jurisdiction. That's why our work with 3E is so incredibly useful and productive, because you can -- you have tools and capacity to bring in all of these different aspects.

I'll have to look more at our own subscription, because that Chemycal functionality strikes me as hugely relevant for any number of chemical platforms, whether it's microplastics, or PFAS, or just trying to identify whether a particular chemical is vibrant in a particular sector of the economy, which is something that we, given our work in TSCA, do all the time. Very good tip, Greg. I appreciate that, so now I'm going to look into that.

You also mentioned supply chain, because if the pandemic taught us anything, it taught us about the fragility of global supply chains. They are always going to be fragile, but also increasingly resilient, because it taught us of our interdependence on every other aspect of supply chain management, right? It's just so incredibly important. It's both important, and we all appreciate that, but it's also, in my view, less predictable in so many respects, given geopolitics, tariff issues. The chemical industry is a little bit in a downturn right now, and so reliability, predictability, and business writ large are sometimes hard to plan out and appreciate all of the implications. What do you think are some of the biggest commercial challenges that 3E clients and customers like us face? And does AI have a role in addressing supply chain challenges?

GG: Yes. That's a great question. And no doubt that supply chain is a big focus for both producers, as well as regulators -- I would say, the interest in supply chain transparency and communication has only grown, and you see that showing up in regulations like the CS triple D regulation (Corporate Sustainability Due Diligence Directive) out of the EU. A lot of the regulation around digital product passports, which continues to grow, and we're very involved in that. But absolutely, our customers face -- across their stakeholder set -- whether it's their very end consumers or their regulators, they face challenge around obtaining high-quality rapid information from their suppliers in order to provide transparency. At the same time, the suppliers are completely overwhelmed by being asked for the same questions over and over, attestations around the products that they are producing and what they are delivering downstream. In fact, we did a survey several months ago, and in our market research, 51 percent of respondents reported poor quality responses from their suppliers.

LLB: We can relate.

GG: Yes, and nearly half reported *non*-responsiveness. The suppliers simply won't respond. We're working with a customer right now that was asking a supplier that supplies them with 650 different substances to attest for each of those; there were about a dozen questions. Then each of those questions would have multiple answers, so you start getting into an exponential data challenge. We do see this as an area where we believe AI will have a huge impact. Some of the things that we're doing there that we will be bringing to market early next year enable just much more efficiency in capturing all that content, making it much easier for suppliers, and then for their downstream customers, and vice versa, because depending on where you are in the supply chain, everyone has the same challenges. But this is absolutely an area to your point. Manufacturers need to be able to be flexible in this supply chains, whether it's because of tariffs, whether it's because of maybe other disruptions, and having that transparency and really understanding your supply chain is only more critical.

LLB: That is just so interesting, Greg, because given TSCA [Section] 8(a)(7) and the relentless requests that our clients both make of their suppliers and that we are urging them to obtain massive amounts of information from suppliers so they're in a position to respond to their downstream customers asking the same of them. Our experience is exactly as you described. It's like we get crickets, and trying to meet a legal standard of due diligence for TSCA Section 8 purposes has been the subject of enormous discussion. You just can't chase people

down if you are continually getting nothing in return, so it's good to know that this is something that 3E is focusing on. It might help both address the legal burden of due diligence, but also get quality, reliable information that you can feel good about, so you can pass that on down the supply chain. It's a huge problem.

GG: Yes, that's right. What we have found is suppliers have a lot of information, but they don't want to spend the time to help curate it, extract it, and codify it, normalize it. So what we're trying to do at 3E is enable them to say, "Okay, you already have all my safety data sheets [SDS]. Here's some additional information, here are environmental product declarations, here are technical data sheets." And to sort of data dump on us, and then allow us through our technology, through our AI, through our experts, to help populate all the necessary fields to make this really unstructured and cumbersome data into usable.

LLB: We've talked some about industrial chemicals, microplastics, PFAS, supply chain. What other trends do you see driving growth in the chemical product stewardship and sustainability industries right now?

GG: That's a good question. First of all, we continue to see innovation in the chemical space. I think AI will have an impact on R&D in chemicals and pharma, a big impact, I think allowing producers to bring products to market in a faster, safer manner, reducing toxins. There's a ton of great research and R&D going on in reformulations. We see all of that continuing.

We also -- while perhaps ESG (environmental, social, and governance) isn't as prominent, we still see sustainability maintaining as a core expectation. With customers really focused in on sustainability investments as good for business, maybe now more under the business resilience heading, and maybe they're pulling away from some of the more social elements of ESG, but we don't see any real pullback in their longer term sustainability goals. We think that's encouraging. Seventy-two percent of respondents in a poll we recently did said that sustainability remains a top priority or has even increased in priority level. There's a lot happening there.

Honestly, digitization, which you might have thought that's already happened, but we still see a long way to go, to be honest, in that realm. We still see in some cases, Lynn, the proverbial three-ring binder of data enablement. There's still a long way to go there. We see all of those trends continuing to impact chemical producers at large, but also EHS professionals.

LLB: I agree with your observation that sustainability initiatives ebb and flow depending upon changing political climates, but at the end of the day, sustainability, product stewardship, these are just rock solid business practices that have been very much baked into contemporary chemical management and innovation. It just, it can't be any other way. I totally agree that that is very much a part of the new normal now. And it's also good to see that AI and digitization and all of the advances that you've alluded to are finding their way into chemical innovation and speeding the process for innovation. One of my many questions about the chemical innovation practice and EPA review of chemicals is how might EPA be using AI technologies to speed the process and make chemical review more efficient and faster. We're big proponents of having thorough, scientifically based chemical reviews by the agency, but also interested in ensuring that those reviews are much more efficient than they now are -- and much faster.

GG: Absolutely.

LLB: Greg, this has been a fascinating conversation. You are at the tip of the spear when it comes to modernizing and making us EHS and chemical professionals more proficient and efficient in our jobs. But is there anything else that we haven't touched upon that you think our listeners would be interested in hearing about? Importantly, too, how can our listeners find more information about 3E and the products and services that it offers?

GG: Absolutely. Thanks, Lynn, for the question. I would say one other area that we're working with EHS professionals on -- and I know maybe I'm probably preaching to the choir on this one, at least with you -- is that it is such a critical function, and it's really not just about risk or risk avoidance or compliance. We see this as just a critical role for business enablement and business growth. We're working with our customers to have a bigger seat at the table, if you will, around enabling their businesses to grow, and I think that's an exciting development in the area of EHS. So that's a fun part of the job.

LLB: For sure.

GG: Yes. Then, in terms of 3E, we would certainly welcome visitors to our website. That's at 3eco.com. We have a whole section there that's called a resource center. I know, Lynn, your webinars are very popular, as are ours. We have a quarterly regulatory roundup webinar that we do that we typically have anywhere from hundreds to thousands of people that tune into those. And those are open to anyone, not just our customers. That's probably the best way to find us.

We were very delighted that we were recently named the top vendor in a group called Verdantix. They had recently a new study around product compliance software; their study provides a good overview of 3E and other vendors in the market. That's also available on our website.

LLB: Well, congratulations on that accolade! That's wonderful.

GG: Thank you. Yes, we've been very honored to get a few different acknowledgments in the past six months around the products and services that we produce for the market.

LLB: I know we're beneficiaries of them, Greg, and we appreciate all of your webinars and everything else that 3E does to give back to the community of professionals. You do pay it forward, and we all appreciate it.

GG: Absolutely.

LLB: Greg, I want to thank you for sharing your thoughts, telling us a little bit about your background, your extraordinary company, and all of the many valuable attributes, services, and professionals working for 3E. We enjoy them, and we thank you for everything that you offer, and thank you being here.

GG: Thank you, Lynn. It's been a great pleasure to speak with you today and look forward to working with you and the rest of our customers down the line. Thanks so much.

LLB: Thank you.

Thanks again to Greg for speaking with me today about 3E's approach to assessing and managing chemical data and information, and using these data in competitive business contexts.

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