

April 23, 2026

Submitted via <http://www.regulations.gov>; Docket ID No. EPA-HQ-OPPT-2025-3955

Document Control Office; Office of Pollution Prevention and Toxics (OPPT)

Environmental Protection Agency, 1200 Pennsylvania Ave., NW

Washington, DC 20460-0001

Re: Agency Information Collection Activities; Proposed Renewal Collection and Request for Comment; Confidential Business Information Claims Under the Toxic Substances Control Act (TSCA)

Dear OPPT,

Thank you for the opportunity to comment on the “**Confidential Business Information Claims Under the Toxic Substances Control Act (TSCA)**” upcoming activity. MilliporeSigma is a leading supplier to the global Life Science Industry, providing solutions and services for research, development, and production of biotechnology and pharmaceutical drug therapies. As such, we manage a large number of LVEs and PMNs that will be impacted by the upcoming CBI expiration.

Request for Batch CBI Renewal:

To streamline the process of assessing and renewing each impacted LVE and PMN, we respectfully request the ability to submit a single CBI extension request covering multiple LVEs and PMNs associated with our company. Without this option, the burden of submitting individual extensions for each LVE or PMN will be considerable and ongoing, as each year will introduce a new set of LVEs and PMNs facing expiring CBI claims.

Request for CBI Renewal for LVEs and PMNs with Unavailable Contacts:

We will face significant challenges in submitting Confidential Business Information (CBI) extension requests if the original authorized agent/submitter will be required: many of our prior filings were made by representatives who are no longer with MilliporeSigma. Consequently, we lack comprehensive documentation related to the technical contacts and authorized agents for past submissions. To address this complexity, we respectfully request the ability to renew CBI coverage using the LVE/PMN filing number or company name, without the requirement to input the LVE or PMN authorized agent for each respective filing. Enabling updates to all existing LVEs and PMNs (with expiring CBI protection) associated with a company facility ID code would greatly streamline and enhance the efficiency of the annual CBI renewal process for companies managing extensive portfolios of LVEs and PMNs.

We appreciate the opportunity to provide feedback on the upcoming collection activity for CBI extensions.

Sincerely,

Melanie Barrett, REM

Senior Regulatory Affairs Expert



The life science business of Merck KGaA, Darmstadt, Germany operates as MilliporeSigma in the U.S. and Canada.

1 of 1

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