



# Toxic Substances Control Act

## Notice to employees and contractors

January 7, 2021

***If you have any questions regarding your rights and obligations under Sections 8(c) and 8(e) of the Toxic Substances Control Act, please contact your Supervisor or the GOM TSCA Coordinator, Valerie Murray (832-816-7712).***

BP is committed to protecting its employees, customers, the general public, and the environment from harmful effects that may be related to our products or operations. Collecting new information on the health or environmental effects of chemicals is an important part of this process. In addition, the Environmental Protection Agency (EPA), through the Toxic Substances Control Act (TSCA), gathers and assesses new information about the health and environmental effects of chemicals. In accordance with our commitment and with EPA regulations, BP has an ongoing program to solicit and evaluate reports of harmful effects to health or the environment. Where appropriate, these harmful effects are recorded and/or reported to EPA. To maintain this commitment, BP encourages the participation of everyone who comes into contact with our products. Under TSCA, employees, customers, and the general public may notify BP of any adverse effects to human health and the environment suspected or known to be caused by our products.

TSCA Section 8(c) requires BP to maintain records of allegations made by employees, customers, and the general public regarding significant adverse reactions to human health and/or the environment believed to result from BP products or operations. Submission of such allegation requires no proof that the harmful effects are caused by BP products or operations. Allegations are reviewed by the Toxicology, Industrial Hygiene, and Medical departments. The allogger is informed of any action taken on the information submitted. Examples of "significant adverse reactions" are shown in Table 1 below.

TSCA Section 8(e) requires BP to inform the EPA of any information that reasonably supports the conclusion that a BP product or operation poses substantial risk of injury to human health or the environment, about which the EPA has no previous knowledge. The information may consist of reports submitted directly by BP employees, customers, or the general public, or it may be results of studies conducted by BP. The information is used by the Agency to determine the need for further regulation of the chemical's use. Examples of effects considered a "substantial risk" are provided in Table 2.

To ensure BP's compliance with TSCA, you should report any occurrence of harmful effects to the TSCA Coordinator, your Supervisor, or HSE. Overall corporate non-compliance can result in civil penalties and possibly, criminal prosecution. You can assist in BP's compliance by being aware of the allegation and reporting requirements and by reporting occurrences that you observe. TSCA strictly prohibits an employer from taking discriminatory action against anyone who submits allegations or reports under Sections 8(c) or 8(e).

BP uses information reported under TSCA Section 8(c) and 8(e) to avoid future occurrences of potentially dangerous situations related to its products and/or operations. However, the benefits of BP's commitment to protect human health and the environment can only be realized through your participation.

***If you have any questions regarding your rights and obligations under TSCA Sections 8(c) and 8(e) of the Toxic Substances Control Act, please contact your Supervisor, the TSCA Coordinator, or BP Global Product Stewardship group, Akanksha Brahmhatt-Patel at 331-236-1568 or Yan Li at 331-702-3109.***

**TABLE 1 - Examples of Significant Adverse Reactions under Section 8(c)**

<b>Health</b>	<b>Environment</b>
<ol style="list-style-type: none"> <li>1. Long-Last or Irreversible Damage                             <ol style="list-style-type: none"> <li>a. Birth Defects</li> <li>b. Cancer</li> <li>c. Chronic Organ Damage</li> </ol> </li> <li>2. Impairment of Bodily Functions                             <ol style="list-style-type: none"> <li>a. Reproductive Disorders</li> <li>b. Neurologic Disorders</li> </ol> </li> <li>3. Impairment of Normal Activities                             <ol style="list-style-type: none"> <li>a. Experienced by Most of the People at One Time</li> <li>b. Experienced Each Time an Individual is Exposed</li> </ol> </li> </ol>	<ol style="list-style-type: none"> <li>1. Changes in the Composition of Animal or Plant Life</li> <li>2. Abnormal Deaths in Organisms (e.g., Fish Kills)</li> <li>3. Decreased Reproductive Success of a Species</li> <li>4. Decreased Crop or Livestock Productivity</li> <li>5. Altered Behavior or Distribution of a Species</li> <li>6. Long Lasting or Irreversible Contamination of the Environment</li> </ol>

**TABLE 2 - Examples of Substantial Risk of Injury Under Section 8(e)**

<b>Health</b>	<b>Environment</b>	<b>Emergency Incidents of Environmental Contamination</b>
<ol style="list-style-type: none"> <li>1. Cancer</li> <li>2. Birth Defects</li> <li>3. Mutagenicity</li> <li>4. Death</li> <li>5. Serious or Prolonged Incapacitation</li> </ol>	<ol style="list-style-type: none"> <li>1. Contamination</li> <li>2. Pronounced Bioaccumulation</li> <li>3. Adverse Effects associated with Chemicals that have Pronounced Bioaccumulation or are Widespread in the Environment</li> <li>4. Changes in Species Behavior, Growth, Survival</li> <li>5. Environmental Contamination which Seriously Threatens Non-Human Organisms with Significant Population Destruction</li> </ol>	<p>Contamination which Seriously Threatens Humans with Cancer, Birth Defects</p>

*If you have questions regarding this message, please contact Alisa Tijerina, HSE&C Manager, GOM and Canada at 346-342-4219.*

