SQUIRE PATTON BOGGS

Karyn Schmidt

Principal

Washington DC
T +1 202 457 5153
M +1 703 795 3254

karyn.schmidt@squirepb.com



About Karyn

Karyn Schmidt, a principal in the Public Policy Practice, has more than 30 years of experience working on chemicals management, environment, sustainability and other issues, as a lawyer and trade association policy representative.

She advises companies and trade associations on the challenges that the chemicals sector faces, with her substantive legal background and relationships across industry, agencies and on Capitol Hill.

Karyn joined the firm after spending nearly 25 years at the American Chemistry Council (ACC), where she most recently served as senior director of regulatory and scientific affairs, and international team leader. Karyn has a deep fluency with the US Toxic Substances Control Act (TSCA), having worked on all aspects of implementation of the major 2016 amendments to TSCA. She was the TSCA risk management lead at ACC. She began her career as an environmental lawyer and worked as an in-house lawyer for ACC, before moving to the policy arena in 2015.

Experience

- Led industry efforts on implementation of the 2016 amendments to the federal TSCA, including promulgation of regulations and new policies, procedures and guidance, in areas ranging from prioritization of chemicals for risk evaluation; risk evaluation; manufacturer requested risk evaluations; risk management; TSCA Inventory reset and associated confidential business information issues; TSCA Chemical Data Reporting; fees rules and assessment; regulation of articles and import requirements; nomenclature and chemical equivalency; regulation of pyrolysis as chemical manufacturing; and new chemicals requirements and significant new use rules.
- Counseled on compliance with test orders under TSCA Section 4 and reporting requirements under TSCA Section 8.
- Counseled on compliance with TSCA polychlorinated biphenyls regulations, including transmission by natural gas pipeline and auto shredder residue.
- Led stakeholder discussions on a negotiated rulemaking on inorganic byproducts.
- Provided advocacy on state ingredient disclosure programs in California and New York; California's Proposition 65; California's Safer Consumer Products Program; and Washington's Safer Products for Washington Program.
- Led the effort for the chemical industry to improve cost-benefit review in framework regulation for Clean Air Act regulations.
- Provided advocacy on extended producer responsibility, microplastics, chemical additives, recycled content, biobased content and associated life cycle sustainability issues, including standing up and expanding an industry microplastics research and advocacy program at both the domestic and global levels.
- Helped design legislative strategy to amend the Federal Food, Drug, and Cosmetic Act (FFDCA) with the Microbead Free Waters Act of 2015 to ensure that microbeads (a category of microplastics) are not classified by the Food and Drug Administration (FDA) as an adulterant.
- Stood up US and international research and advocacy programs on emerging microplastics issues and led state, federal and international advocacy on microplastics issues, including monomers (e.g., BPA, styrene and vinyl chloride) and plastics additives (e.g., phthalate esters and flame retardants).
- Compliance counseling on environmental marketing and environmental, social and governance (ESG) claims and advocacy with the US Federal Trade Commission to update the *Green Guides*.
- Managed internal advertising claims audit and claims substantiation documentation for a client following scrutiny of public claims regarding state attorneys general.
- Helped lead regulatory strategy for the FDA to remove food contact authorization, and for the Environmental Protection Agency (EPA) to avoid listing of a chemical under TSCA Section 5(b)(4) as a chemical of concern.
- Managed a broad range of compliance issues and litigation arising under state and federal environmental laws, including TSCA, FFDCA, the Federal Hazardous Substances Act (FHSA), the Resource Conservation and Recovery Act (RCRA), the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), the Emergency Planning and Community Right-to-Know Act (EPCRA), the Clean Water Act (CWA) and the Safe Drinking Water Act (SDWA).
- Managed a global network of chemical companies addressing chemicals management, trade, export and import and compliance issues in jurisdictions across the world.

Credentials

Education

- William and Mary Law School, J.D., 1991
- James Madison University, B.S., 1988

Admissions

- District of Columbia, 2025
- Virginia, 1991

Courts

- U.S. Ct. of App., Fourth Circuit
- U.S. Dist. Ct., S. Dist. of West Virginia

Memberships & Affiliations

- Vice-chair, Pesticides and Chemicals Committee, American Bar Association Section of Environment, Energy and Resources

Expertise

Services

- Public Policy
- Environmental, Safety & Health

Industries

- Chemicals

Media

- Quoted, "Employers Enter a 'Tricky Time' of Dual, Evolving Chemical Rules," Bloomberg Law, July 22, 2025.
- Quoted, "ACC sees 'palpable optimism' in Trump deregulation agenda," Plastics News, April 16, 2025.
- Quoted, "Curbs on All Chemicals Likely From EPA Proposal, Industries Told," Bloomberg Law, November 29, 2023.
- Quoted, "Cleaning Up EPA Chemicals List Could Ease Corporate Risks," Bloomberg Law, May 22, 2018.
- Quoted, "Backing Industry, EPA Plans Pre-Submission Review For New Chemicals," Inside EPA's Risk Policy Report, Vol. 25, No. 10, March 6, 2018.
- Quoted, "Industry Eyes Novel TSCA Analysis For Siloxanes But Doubts Need For Rules," Inside EPA's Risk Policy Report, Vol. 24, No. 38, September 26, 2017.
- Quoted, "EPA TSCA Guide May Give Industry New Strategies For Risk Evaluations," Inside EPA's Risk Policy Report, Vol. 24, No. 37, September 19, 2017.
- Quoted, "EPA Sidesteps State Request For Update On ESA Pesticide Framework," Inside EPA's Risk Policy Report, Vol. 24, No. 37, September 19, 2017.
- Quoted, "Trump's EPA May Be Weakening Chemical Safety Law," Scientific American, August 16, 2017.
- Quoted, "Chemical Industry Eyes New Chance to Drive EPA Risk Analyses," Bloomberg Law, July 17, 2017.
- Quoted, "NAS Expected To Bolster EPA's STAR Grants As Trump Seeks Elimination," Inside EPA's Risk Policy Report, Vol. 24, No. 18, May 2, 2017.
- Quoted "EPA TSCA Review Plan Sparks Debate Over Scope Of 'Uses' To Consider," Inside EPA's Risk Policy Report, Vol. 24, No. 8, February 21, 2017.
- Quoted, "EPA Floats Options For Clearing Backlog Of TSCA New Chemicals Reviews," Inside EPA's Risk Policy Report, Vol. 23, No. 51, December 20, 2016.
- Quoted, "Chemical Manufacturers Say Updated TSCA Is 'Creating Backlog' in Bringing New Substances to Market," E+ELeader, December 20, 2016.
- Quoted, "ACC Warns California's Prop. 65 Warning Rules Violate First Amendment," Inside EPA's Risk Policy Report, Vol. 23, No. 25, June 21, 2016.
- Quoted, "Advocates Reiterate Calls For Glyphosate Ban, Faulting EPA Risk Reviews," Inside EPA's Risk Policy Report, Vol. 23, No. 25, June 21, 2016.

Publications & Speaking Engagements

- Speaker, "TSCA and Chemical Product Law", Environmental Law 2026, The American Law Institute, March February 19, 2026.
- Speaker, "TSCA Developments 2026", Enhese (Chemical Watch), February 5, 2026.
- Panelist, "Roundtable: Entangling or Disentangling: How to Improve Mutual Understanding Between Risk Assessment and Risk Management", Society for Risk Analysis Annual Meeting, December 10, 2025.
- Speaker, "TSCA Risk Management," Global Chemical Regulatory Updates 2025 Conference, Enhesa (Chemical Watch), October 23, 2025.
- Speaker, "Evaluating the Impacts of Deregulatory Policies on Environmental Regulations," Regulatory Summit North America 2025, Enhesa (Chemical Watch), September 15, 2025.

- Speaker, “TSCA Reform – Nine Year’s Later: Risk Evaluation,” Toxic Substances Control Act Annual Conference, Environmental Law Institute, June 25, 2025.
- Speaker, “New Administration’s Deregulatory Agenda and Implications for TSCA,” Global Chemical Regulations Conference, American Chemistry Council, April 15, 2025.
- Speaker, “What’s Next for TSCA Risk Management,” Asphalt Roofing Manufacturers Association, March 19, 2025.
- Speaker, “What is Next for TSCA Litigation,” Enhesa (Chemical Watch), February 27, 2025.
- Speaker, “Recent Developments in TSCA Section 6, Risk Evaluations and Risk Management,” Regulatory Summit North America 2024, Enhesa (Chemical Watch), September 16, 2024.
- Moderator, “TSCA Reform – 8 Years Later – Risk Management,” Environmental Law Institute, June 25, 2024.
- Moderator, “CEPA Implementation,” GlobalChem 2024, March 27, 2024.
- Moderator, “Risk Management,” GlobalChem 2024, March 27, 2024.
- Moderator, “TSCA Risk Management,” GlobalChem 2024, March 26, 2024.
- Moderator, “Interagency Agreements,” GlobalChem 2023, April 5, 2023.
- Moderator, “Risk Management Rules,” GlobalChem 2023, April 5, 2023.
- Speaker, “Global Impact From the EU Chemical Strategy for Sustainability: What’s Happening Worldwide as a Result?” The EU Chemicals Strategy for Sustainability: One Year On, Enhesa (Chemical Watch), October 20, 2021.
- Speaker, “TSCA’s impact on the chemical industry supply chain,” TSCA Developments 2021, June 9, 2021.
- Moderator, “Emerging Global Microplastics Issues,” GlobalChem 2021, March 31, 2021.
- Speaker, “What’s New with TSCA and How Does It Intersect with California’s Chemical Regulations,” Prop 65 Clearinghouse, September 23, 2019.
- Speaker, “A Two-Year Lookback on Trump’s Deregulatory Record,” Section on Administrative Law and Rulemaking, Regulatory Policy Committee, American Bar Association, July 12, 2019.
- Moderator, “Developments in International Public Law,” GlobalChem 2019, March 8, 2019.
- Moderator, “SAICM Beyond 2020: New Developments and Significant Implications,” GlobalChem 2019, March 8, 2019.
- Moderator, “FDA Food Contact Regulation: Product & TSCA Interface,” GlobalChem 2019, March 7, 2019.
- Speaker, “TSCA Panel Session,” Enhesa (Chemical Watch), October 31, 2018.
- Speaker, “Federal Preemption: Legislative and Legal Challenges Facing Prop. 65,” Prop 65 Clearinghouse, September 24, 2018.
- Speaker, “State Product Labeling Regulations,” Southern Aerosol Technical Association, September 20, 2018.
- Speaker, “Reformed TSCA and Green Chemistry,” Safer Chemicals in Products Conference, Enhesa (Chemical Watch), September 18, 2018.

- Speaker,"PMN Submissions Under a Revised TSCA," Enhesa (Chemical Watch), October 31, 2017.
- Speaker, "Panel Discussion: Dealing With the New TSCA," Ohio Chemistry Technology Council, August 8, 2017.
- Speaker, "Industry Perspectives on Existing Chemical Risk Evaluations," The Toxicology Forum, July 12, 2017.
- Moderator, "LCSA & State Based Regulations," GlobalChem 2017, February 23, 2017.Speaker, "Consideration of Unreasonable Risk Under the Lautenberg Chemical Safety Act," Society for Risk Analysis, January 10, 2017.
- Speaker, "The Frank R. Lautenberg Chemical Safety for the 21st Century Act (LCSA)," Society for Risk Analysis, January 10, 2017.
- Moderator, "The Global Evolution of Endocrine Disruption Assessment and Regulation," GlobalChem 2016, March 23, 2016.
- Moderator, "Prop 65 Session," GlobalChem 2016, March 23, 2016.
- Co-author, "Retailer Sustainability and the Supply Chain," National Resources & the Environment, Spring 2012.
- Author, "Personal Jurisdiction in Internet Transactions," West Virginia Defense Trial Counsel Notebook, Summer 1998.
- Author, "Rohm & Haas Was Right: Recovery of Government Oversight Costs in Private Party Response Actions," 19 William & Mary Environmental and Policy Review 253, 1995.
- Speaker, "Superfund Update," Environmental Law in Kentucky, April 1994.
- Speaker, "Hazardous Waste Management," West Virginia Manufacturers Association Annual Environmental Seminar, Spring 1994.
- Co-author, "Changing a Promulgated Regulation," Topical Workshop on the Technical Basis for Measuring, Modeling, and Mitigating Toxic Aerosols, 1993.
- Contributor, "Special Committee on Environmental Crimes, 1993 Annual Report, Natural Resources, Energy, and Environmental Law 1993: The Year in Review," 1993.

About our firm

One of the world's strongest integrated law firms, providing insight at the point where law, business and government meet. We deliver commercially focused business solutions by combining our legal, lobbying and political capabilities and invaluable connections on the ground to a diverse mix of clients, from long-established leading corporations to emerging businesses, startup visionaries and sovereign nations. More than 1,500 lawyers in over 40 offices across four continents provide unrivaled access to expertise.