

CHEMICAL HERITAGE FOUNDATION

**THE TOXIC SUBSTANCES CONTROL ACT:  
FROM THE PERSPECTIVE OF  
J. CLARENCE DAVIES**

Transcript of Interviews  
Conducted by

Jody A. Roberts and Kavita D. Hardy

at

Resources for the Future  
Washington, D.C.

on

30 October 2009

(With Subsequent Corrections and Additions)

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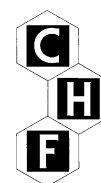
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## **J. CLARENCE DAVIES**

1937 Born in Manhattan, New York on 16 November

### Education

1959 B.A., American Government, Dartmouth College  
1965 Ph.D., American Government, Columbia University

### Professional Experience

1963-1965 Bowdoin College, Brunswick, Maine  
Instructor in Government and Director of the Bureau for Research  
in Municipal Government

1965-1967 Bureau for the Budget, Executive Office of the President, Washington,  
D.C.  
Chief Examiner for Environmental and Consumer Protection

1967-1970 Princeton University, Princeton, New Jersey  
Assistant Professor of Politics and Public Affairs

1970-1973 Council on Environmental Quality, Executive Office of the President,  
Washington, D.C.  
Senior Staff Member

1973-1976 Resources for the Future, Washington, D.C.  
Fellow and Assistant Director, Institutions and Public Decisions  
Division

1976-1989 The Conservation Foundation, Washington, D.C.  
Executive Vice President

1989-1991 U.S. Environmental Protection Agency, Washington, D.C.  
Assistant Administrator for Policy, Planning, and Evaluation

1991-1992 National Commission on the Environment, Washington, D.C.  
Executive Director

1992-2000 Resources for the Future, Washington, D.C.  
Senior Fellow and Director, Center for Risk Management

1992-Present Senior Fellow, Risk, Resources, and Environmental Management  
Division

2005-Present Woodrow Wilson International Center for Scholars, Washington, D.C.  
Senior Advisor

Honors

1959 Phi Beta Kappa

2000 Elected Fellow, American Association for Advancement of Science

## ABSTRACT

**J. Clarence Davies's** interview begins with a discussion of his education, and his uncertainty over whether to become an activist or academic. He settled on becoming a professor of public administration, but realized he wanted to have experience working in government. Davies briefly worked at the Office of Management and Budget as the examiner for the environment, where he found himself continually bombarded by chemical crises. He returned to academia, where he wrote an influential book on pollution and chemical regulation, *The Politics of Pollution*, but was quickly drawn back to government work. Davies soon became involved with the Ash Council, creating the Environmental Protection Agency. Once at the Council on Environmental Quality (CEQ), he was asked to draft a proposal for a chemical regulation policy; the legislation underwent several iterations as it proceeded through the administration and Congress. Although it eventually passed, it ended up severely weakened. After his time at the CEQ, Davies continued to work on the regulation of chemicals at several non-profit organizations and at the EPA.

Throughout the interview Davies discussed the difficulties in implementing the Toxic Substances Control Act. These included: reaching consensus on the definition of unreasonable risk; developing criteria for risk-assessment; the lack of toxicity data the legislation was able to procure; and crafting testing rules. He also emphasized the legal constraints within TSCA that hindered creating an effective chemicals control policy and the long overdue need for TSCA reform. Davies concluded the interview by commenting on the fact that a new European chemicals policy and increased regulatory activity among the States, as well as attention from prominent environmental groups, has driven the current TSCA reform process. According to Davies, the most important elements of TSCA to address in reform will be the burden of proof in TSCA, the way new chemicals are treated and defined, a re-emphasis on the cross-media capabilities of TSCA, and confidential business information.

## INTERVIEWERS

**Jody A. Roberts** is the Associate Director for the Center for Contemporary History and Policy and the Manager of the Environmental History and Policy Program at the Chemical Heritage Foundation. Roberts received his Ph.D. and M.S. in Science and Technology Studies from Virginia Tech and holds a B.S. in Chemistry from Saint Vincent College. His research focuses on the intersections of regulation, innovation, environmental issues, and emerging technologies within the chemical sciences.

**Kavita D. Hardy** is a research assistant in the Environmental History and Policy Program at the Chemical Heritage Foundation. She received a B.A. in Chemistry and in Economics from Swarthmore College.

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