



## Sarah E. Amick

Special Counsel



202.719.3465



samick@wiley.law



Sarah helps global companies and industry associations navigate chemical regulations, manage end-of-life products, and advance sustainability initiatives. She represents clients before the Administration, federal regulatory agencies, and Congress in obtaining strategic public policy goals. She advises businesses and industry associations on global policy initiatives, identifies opportunities for proactive engagement with policymakers, and develops global advocacy strategies and industry partnerships to achieve policy objectives.

Sarah also helps a wide range of companies and industry associations ensure compliance with the Toxic Substances Control Act (TSCA), Proposition 65, and California's Safer Consumer Product Regulations. She offers clients strategic business advice on international, federal, and state chemical regulations; emerging policy issues related to chemical use, risk evaluation and risk management; crisis communications; consumer product labeling; facility emissions; extended producer responsibility; and emerging environmental, social, and governance (ESG) regulatory requirements.

Sarah brings to her practice extensive in-house experience having served as ESG counsel at one of the largest global metals corporations and as Senior Vice President and Senior Counsel at a Washington, DC-based trade association that represents the tire manufacturing industry before Congress, the Administration, and regulatory agencies. She has extensive experience counseling companies in the tire, metals, and automotive sectors.

## Representative Matters



## Practice Areas



Environment & Product Regulation  
Toxic Substances Control Act (TSCA)  
End-of-Life Product Management  
Environmental, Social & Governance (ESG)

## Credentials



### Education

J.D., Suffolk University  
B.A., Trinity College

### Bar and Court Memberships

District of Columbia Bar  
Massachusetts Bar

## **Chemicals, Substances in Articles, and Product-Related Environmental Compliance**

- Organized a coalition of trade groups to advance the interests of downstream product manufacturers during the implementation of new provisions of TSCA (added by the Frank R. Lautenberg Chemical Safety for the 21st Century Act).
- Led a coalition of trade associations in successfully obtaining a no action assurance memo from EPA to exempt imported articles containing TSCA high-priority chemicals from testing and TSCA fees.
- Developed a comprehensive public policy, research, and communications response to research revealing aquatic toxicity to salmon from a crucial tire material, 6PPD.
- Counseled major tire manufacturers regarding regulation of 6PPD under the California Safer Consumer Product Program.
- Testified before the U.S. House Natural Resources Subcommittee on Oversight and Investigations to support an alternative analysis of 6PPD under the California Safer Consumer Products Regulations.
- Collaborated on regulatory needs for 6PPD under the EU's Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulation, ensuring alignment with U.S. regulatory submissions.
- Developed a compliance assessment program in response to regulatory changes to California Proposition 65 labeling requirements.

## **End-of-life product management, Circular Economy, Plastics/Microplastics**

- Identified funding opportunities in the Bipartisan Infrastructure Law and the Inflation Reduction Act to accelerate the development of circular economy solutions for end-of-life tires.
- Counseled manufacturing clients on the development of the first Extended Producer Responsibility law for scrap tires in the U.S.
- Led engagement with the U.S. State Department on behalf of an industry association to ensure the development of a new global instrument on plastic pollution promotes innovation and multifaceted solutions to address microplastics.

## **Facility emissions**

- Informed the development of a final Clean Air Act Residual Risk and Technology Rulemaking for the rubber tire sector, securing a final rule that imposed no additional air emissions regulatory requirements.

## **Environment, Social, Governance (ESG)**

- Led the ESG regulatory compliance, disclosure, and reporting program for a major U.S. manufacturer and organized a coalition of companies to advance ESG compliance and sound policies.
- Advised a major U.S. manufacturer on ESG disclosures and communications to ensure compliance with green washing regulations.

## Professional Experience

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- Environmental, Social, Governance (ESG) Counsel, Alcoa Corporation (2023-2024)
- U.S. Tire Manufacturers Association (USTMA)
  - Senior Vice President & Senior Counsel (2022-2023)
  - Vice President & Senior Counsel (2016-2022)
  - Senior Counsel (2012-2016)
  - Environmental Counsel (2008-2012)

## Affiliations

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- Environmental Law Institute (ELI)