



Paul Jacobson Highlights the EPA's Recent Update to Audit Policy for Voluntarily Disclosed Environmental Violations

Spencer Fane attorney [Paul Jacobson](#) recently authored an article for *Industry Today* covering the Environmental Protection Agency's (EPA) recent update to its audit policy.

Titled "EPA Clarifies Audit Policy on Disclosed Violations," the article discusses how manufacturers and industrial operators can voluntarily disclose violations if certain criteria are met, which can potentially lead to a complete elimination of civil penalties. Paul describes the technical clarifications of the guidance, including the scope of voluntary disclosure, admission of liability, compliance audits, and Clean Water Act monitoring violations.

"EPA's new guidance document is a strong indication of Biden Administration intent to support the Audit Policy and encourage companies to voluntarily disclose environmental violations," Paul explained in the article. "The guidance purports to describe how EPA exercises its enforcement discretion, without creating any rights, duties, obligations, or defenses of any third parties."

To read the full article, please click [here](#).