

American Alliance for Innovation

Federal Advocacy Committee



July 20, 2026

The Honorable Lee Zeldin
Administrator
Environmental Protection Agency

The Honorable David Keeling
Assistant Secretary of Labor for Occupational Safety and Health

The Honorable Russell Vought Director
Office of Management and Budget

Re: Coordination to Ensure a Single Federal Framework for Worker Chemical Safety

Dear Administrator Zeldin, Assistant Secretary Keeling, and Director Vought:

We are writing on behalf of the American Alliance for Innovation (AAI) to urge the Environmental Protection Agency (EPA) and the Occupational Safety and Health Administration (OSHA) to work jointly, using the authorities provided under Section 9 of the Toxic Substances Control Act (TSCA), to ensure a single, consistent federal regulatory framework governing worker safety.

AAI is a coalition of trade associations representing a broad cross-section of the United States economy, including every stage of the chemicals value chain and the advanced manufacturing it enables. AAI members are deeply committed to worker health and safety. However, we are concerned that EPA's implementation of its TSCA authorities is undermining, rather than strengthening, worker protection.

For example, in TSCA risk management rules, EPA has established a Workplace Chemical Protection Program that not only creates overlap but also results in dueling federal frameworks between EPA and OSHA that impose conflicting assumptions, requirements, and implementation approaches on the same workers, in the same workplace, for the same occupational risk. When two federal agencies establish different exposure limits, monitoring approaches, or compliance obligations for the same chemical, it creates confusion at the facility level, complicates decision-making, and undermines clarity regarding safe practices.

Congress provided a clear pathway to avoid these outcomes. TSCA Section 9 explicitly authorizes EPA to coordinate with OSHA on worker safety matters, including referring findings of unreasonable risk to OSHA for evaluation and action, thereby enabling a unified,

singular regulatory approach. This authority should be fully utilized to protect workers under one consistent and coherent federal standard.

Recognizing the confusion created for companies and workers by competing EPA and OSHA regulations, last year Congress included directives in House Report 119-215 accompanying the Department of the Interior, Environment, and Related Agencies Appropriations Act for Fiscal Year 2026 stating:

“Regarding Section 9 of TSCA. The Committees direct EPA to revise the Memorandum of Understanding (MOU) with the Occupational Safety and Health Administration (OSHA) to meaningfully delineate between each Agency’s role and clearly articulate the areas of collaboration between the agencies. Further, the Committees remind EPA of the requirements in Section 9 of TSCA (15 U.S.C. 2608) related to responses from other Federal agencies.”

Building on that clear Congressional direction, we respectfully urge EPA and OSHA to work together to operationalize Section 9, strengthen interagency coordination, and align regulatory responsibilities in a manner that leverages each agency’s expertise while eliminating duplicative or conflicting requirements.

AAI and its members stand ready to support this effort and to engage constructively with both agencies to advance a more effective, coordinated, and durable framework.

Thank you for your leadership and consideration.

Sincerely,

Acrylonitrile Group
Agriculture Retailers Association
Alliance for Automotive Innovation
Alliance for Chemical Distribution (ACD)
Aluminum Association
American Chemistry Council
American Cleaning Institute
American Coatings Association
American Coke and Coal Chemicals Institute
American Composites Manufacturers Association
American Feed Industry Association
American Foundry Society
American Fuel & Petrochemical Manufacturers
American Petroleum Institute (API)
American Wood Council
AmericanHort
Asphalt Roofing Manufacturers Association (ARMA)
Auto Care Association
Battery Council International
Business Institutional Furniture Manufacturers Association
Chemical Industry Council of Illinois
Chemical Users Coalition

Color Pigments Manufacturers Association
Communications Cable & Connectivity Association (CCCA)
Composite Panel Association
Decorative Hardwoods Association
EPS Industry Alliance
Essential Minerals Association
Extruded Polystyrene Foam Association (XPSA)
Flexible Packaging Association
Florida Tropical Fish Farm Association
Forging Industry Association
Global Electronics Association
Household & Commercial Products Association
INDA - Association Nonwoven Fabrics Industry
Independent Lubricant Manufacturers Association (ILMA)
International Safety Equipment Association
Institute of Makers of Explosives
Manufacture Alabama
Massachusetts Chemistry & Technology Alliance (MCTA)
Metal Construction Association
Mississippi Business Alliance
National Association of Manufacturers
National Cotton Council
National Cotton Ginners Association
National Electrical Manufacturers Association (NEMA)
National Funeral Directors Association
National Mining Association
National Tooling and Machining Association
Non-Ferrous Founders' Society
North American Association of Food Equipment Manufacturers (NAFEM)
North American Die Casting Association (NADCA)
Ohio Chemistry Technology Council
Pennsylvania Chemical Industry Council
Plant Based Products Council
Plastics Industry Association
Polyisocyanurate Insulation Manufacturers Association
Precision Machined Products Association
Precision Metalforming Association
Print Creative Alliance
PRINTING United Alliance
RadTech--UV+EB Technology Association
RV Industry Association
Society of Chemical Manufacturers & Affiliates (SOCMA)
Spray Polyurethane Foam Alliance
Steel Founders' Society of America
The Adhesive and Sealant Council
The American Home Furnishings Alliance (AHFA)
The Fertilizer Institute

The International Cast Polymer Association

The National Mining Association

U.S. Chamber of Commerce

U.S. Tire Manufacturers Association

USA Rice

Vinyl Institute

WV Manufacturers Association