

March 11, 2021

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Administrator Regan:

Congratulations on your confirmation as Administrator of the Environmental Protection Agency (EPA). The undersigned U.S. trade associations, members of the American Alliance for Innovation (AAI), represent a broad spectrum of American companies along the chemistry value chain.

AAI members represent large and small business sectors with far-reaching impact across the U.S. economy, including aerospace, agriculture, textiles, apparel, automotive, tires, building and construction materials, chemical and raw material production, consumer and industrial goods, distribution, electronics, energy, equipment manufacturers, food and grocery, footwear, healthcare products and medical technology, information technology, mining and metals, paper products, plastics, retail, storage, and travel goods.

In 2016, President Obama signed into law the Frank R. Lautenberg Chemical Safety for the 21st Century Act (Lautenberg Act), the result of nearly a decade of negotiations between Democratic and Republican lawmakers to amend and modernize the Toxic Substances Control Act (TSCA). The Lautenberg Act united a broad coalition consisting of AAI Members and many others from industry, environmental groups, public health, animal rights, and labor organizations. It was passed by overwhelming bipartisan majorities in the House and Senate.

In the five years since President Obama signed the Lautenberg Act into law, the dedicated staff at the EPA have worked diligently to ensure that its provisions are successfully implemented as Congress intended. During that time, EPA has largely met its deadlines and received public feedback on the key regulations and processes that are the foundation of the law. As is customary with a new law, not everyone has agreed with the Agency's approach to implementation; some have even challenged the EPA TSCA framework rules in court. However, EPA's regulatory efforts have largely withstood judicial scrutiny, which is validation that the Agency has adhered to the letter and spirit of the law.

A great deal of work remains to be done which presents the Administration with an important opportunity. Steady and consistent progress will continue only if EPA, industry, and others commit to it; view each other as partners with shared goals; and cooperate to reach milestones. Rigorous and transparent science is the foundation for a healthier environment. The partnership that our industries and EPA share is key to making progress and is integral to overcoming challenges that could potentially set us back.

Transparency and clear communication between EPA, industry, consumers, and others is key to ensuring that TSCA is implemented effectively and efficiently—which will be key towards enhancing public confidence in the safety of chemicals and the regulatory process. Successful implementation of TSCA, in accordance with the statute and congressional intent, is essential to ensuring protections for human health and the environment, while enabling our industries to continue to innovate, create jobs, and grow the economy.

Thank you for your leadership and commitment to this important matter. We look forward to working with you over the coming years.

Sincerely,

Agricultural Retailers Association
Alkylphenols & Ethoxylates Research Council
American Apparel & Footwear Association
American Chemistry Council
American Cleaning Institute
American Coatings Association
American Coke and Coal Chemicals Institute
American Composites Manufacturers Association
American Forest & Paper Association
American Fuel & Petrochemical Manufacturers
American Petroleum Institute
APA - The Engineered Wood Association
Association of Home Appliance Manufacturers
Auto Care Association
Battery Council International
Can Manufacturers Institute
Chemical Fabrics and Film Association
Composite Panel Association
Consumer Technology Association
Decorative Hardwoods Association
EPS Industry Alliance
Flexible Packaging Association
Fragrance Creators Association
Halogenated Solvents Industry Alliance, Inc.
Household & Commercial Products Association
INDA, Association of the Nonwoven Fabrics Industry
Industrial Minerals Association - North America
Institute of Makers of Explosives
International Institute of Synthetic Rubber Producers, Inc.
IPC
Juvenile Products Manufacturers Association (JPMA)
Kitchen Cabinet Manufacturers Association
Methanol Institute
National Association for Surface Finishing

National Association of Chemical Distributors
National Association of Manufacturers
National Association of Printing Ink Manufacturers
National Council of Textile Organizations
National Electrical Manufacturers Association (NEMA)
National Mining Association
National Stone, Sand & Gravel Association
Outdoor Power Equipment Institute, Inc.
Pine Chemicals Association International
Plastics Industry Association (PLASTICS)
Plumbing Manufacturers International
Polyisocyanurate Insulation Manufacturers Association
Polyurethane Manufacturers Association
Precision Machined Products Association
PRINTING United Alliance
Resilient Floor Covering Institute
Retail Industry Leaders Association
RISE (Responsible Industry for a Sound Environment)
Society of Chemical Manufacturers & Affiliates (SOCMA)
Sports & Fitness Industry Association (SFIA)
Spray Polyurethane Foam Alliance
Styrene Information and Research Center
The Adhesive and Sealant Council
The Aluminum Association
The Center for Baby and Adult Hygiene Products
The Chlorine Institute
The Fertilizer Institute
The Toy Association
Tire Industry Association
Treated Wood Council
U.S. Chamber of Commerce
U.S. Tire Manufacturers Association
Vinyl Institute

Cc: The Honorable Tom Carper, Chair, Senate Committee on Environment and Public Works
The Honorable Frank Pallone, Chair, House Energy and Commerce Committee
The Honorable Shelley Moore Capito, Ranking Member, Senate Committee on
Environment and Public Works
The Honorable Cathy McMorris Rodgers, Ranking Member, House Energy and
Commerce Committee