American Alliance for Innovation

Federal Advocacy Committee



September 8th, 2025

The Honorable Shelley Moore Capito
Chairman
U.S. Senate Committee on Environment and
Public Works
410 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Sheldon Whitehouse Ranking Member U.S. Senate Committee on Environment and Public Works 456 Dirksen Senate Office Building Washington, DC 20510 The Honorable Brett Guthrie Chairman U.S. House Committee on Energy and Commerce 2125 Rayburn House Office Building Washington, DC 20515

The Honorable Frank Pallone
Ranking Member
U.S. House Committee on Energy and
Commerce
2323 Rayburn House Office Building
Washington, DC 20515

Dear Chairmen Capito and Guthrie, and Ranking Members Whitehouse, and Pallone:

We are writing on behalf of the American Alliance for Innovation (AAI) to support your work to improve implementation of the Toxic Substances Control Act (TSCA) and ensure a regulatory system that balances human health and environmental concerns with domestic supply chain and innovation needs and supports growth in our manufacturing sector. The AAI is an alliance of trade associations representing a broad spectrum of the economy and represents many sectors, at all points along the chemicals value chain and the American manufacturing sector it supports.

In 2016, Congress passed the landmark Frank R. Lautenberg Chemical Safety for the 21st Century Act, which made substantial changes to TSCA, with overwhelming bipartisan support in both the Senate and House. AAI members played a vital role in supporting these efforts and worked with Congressional stakeholders to develop the legislation and work towards its passage.

Now, nearly a decade later, and based on our experiences since those 2016 reforms, we offer our help to recommend necessary improvements to the statute as Congress considers extending TSCA fee authorities before they expire in September 2026. We believe these recommended

improvements to TSCA will assist EPA in its efforts to appropriately identify and manage identified unreasonable risks of injury to health and the environment while also supporting American manufacturing and the chemicals spurring economic growth and innovation.

At its core, TSCA is designed to foster an environment where manufacturers can build our economy and improve everyday life without creating unreasonable risks to the public. In this way, Americans are constantly promoting new innovation.

In crafting and passing the law, Congress soundly rejected a precautionary model in favor of a risk-based approach focused on both hazard and real-world exposures of the chemical substance's conditions of use.

We appreciate the work you have already done since the start of the 119th Congress, including holding a hearing on TSCA implementation, actively soliciting ideas for improvements to the statute from stakeholders, and planning additional Congressional oversight. It is important to build on that work and build momentum by further developing these ideas into a legislative proposal that can be vetted fully.

Our organizations have challenges with TSCA and have identified some additional statutory improvements and clarifications, including:

- Ensuring timely and predictable reviews of new chemicals;
- Avoiding unnecessary regulation, including overuse of Consent Orders (COs) and Significant New Use Rules (SNURs) that discourage adoption of innovative and sustainable chemicals;
- Following a risk-based approach to regulating a chemical's intended use in commerce that is rooted in actual uses and real-world scenarios;
- Strengthening the scientific standards included in TSCA for what constitutes "the weight of the scientific evidence;" and,
- Providing additional clarity to other sections of TSCA that govern testing, regulatory petitions, and data sharing.

We recognize this will not be a simple undertaking and will require support from a range of stakeholders both within and outside of Congress. However, we believe these improvements are essential and can provide needed certainty for TSCA to be a gold standard chemical management system. The need for Congress to extend TSCA fee authority in 2026 provides a ripe opportunity to improve TSCA.

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Sincerely,

Agricultural Retailers Association

Alliance for Automotive Innovation

Alliance for Chemical Distribution

American Chemistry Council

American Cleaning Institute

American Coatings Association

American Coke and Coal Chemicals Institute

American Composites Manufacturers Association

American Feed Industry Association

American Forest and Paper Association

American Foundry Society

American Fuel & Petrochemical Manufacturers

American Home Furnishings Alliance

American Petroleum Institute

American Trucking Association

American Wood Council

Asphalt Roofing Manufacturers Association

Association of the Nonwoven Fabrics Industry

Battery Council International

Business Institutional Furniture Manufactures Association (BIFMA)

Can Manufacturers Institute

Center for Polyurethanes Industry

Chemical Industry Council of Delaware

Chemical Industry Council of Illinois

Chemical Users Coalition

Chemistry Council of New Jersey

Color Pigments Manufacturers Association

Communications Cable & Connectivity Association

Composite Panel Association

Consumer Technology Association

Decorative Hardwoods Association

EPS Industry Alliance

Flexible Packaging Association

Fragrance Creators Association

Georgia Chemistry Council

Global Electronics Association

Household & Commercial Products Association

Idaho Association of Commerce & Industry

Illinois Chamber of Commerce

Independent Lubricant Manufacturers Association

Independent Women's Forum

Indiana Manufacturers Association

Institute of Makers of Explosives

International Cast Polymer Association

International Lead Association

International Molybdenum Association

International Sign Association

International Sleep Products Association

International Wood Products Association

Kansas Chamber of Commerce

Kansas Manufacturing Council

Kentucky Association of Manufacturers

Kentucky Chemistry Council

Kitchen Cabinet Manufacturers Association

Louisiana Chemical Association

Maine State Chamber of Commerce

Manufacture Alabama

Michigan Chemistry Council

Minnesota Chamber of Commerce

Mississippi Manufacturers Association

Motorcycle Industry Council

National Aquaculture Association

National Asphalt Pavement Association

National Association of Manufacturers

National Association of Printing Ink Manufacturers

National Electrical Manufacturers Association

National Funeral Directors Association

National Mining Association

National Wood Flooring Association

Nebraska Chamber of Commerce & Industry

Non-Ferrous Founders' Society

North American Association of Food Equipment Manufacturers

North American Insulation Manufacturers Association

North American Modern Building Alliance

Ohio Chemistry Technology Council

Oregon Business & Industry

Pennsylvania Chemical Industry Council

Pine Chemicals Association International

Plastics Industry Association

Plumbing Manufacturers International

Polyisocyanurate Insulation Manufacturers Association

Polymeric Exterior Products Association

Polyurethane Manufacturer's Association

PRINTING United Alliance

RadTech—UV+EB Technology Nonprofit Association

Recreational Off-Highway Vehicle Association

Responsible Industry for a Sound Environment

Silicones Environmental, Health, and Safety Center

Society of Chemical Manufacturers & Affiliates

South Carolina Chemistry Council

Specialty Vehicle Institute of America

Spray Foam Coalition

Spray Polyurethane Foam Alliance

Steel Founders' Society of America

Styrene Information and Research Center

Synthetic Amorphous Silica and Silicate Industry Association

Tennessee Chamber of Commerce & Industry

Texas Association of Manufactures

Texas Chemistry Council

The Adhesive and Sealant Council

The Fertilizer Institute

The Linen, Uniform and Facility Services Association

Treated Wood Council

U.S. Chamber of Commerce

U.S. Tire Manufacturers Association

Vinyl Institute

Virginia Manufacturers Association

Washington State Dairy Federation

West Virginia Manufacturers Association

Wisconsin Manufacturers & Commerce

CC: The Honorable John Curtis
Chairman

The Honorable Jeff Merkley Ranking Member

The Honorable Gary Palmer Chairman

The Honorable Paul Tonko Ranking Member