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Submitted via regulations.gov

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Re: Docket ID No: EPA-HQ-OPPT-2021-0057
Regulation of Certain Conditions of Use Under Section 6(a) of the Toxic Substances Control Act (TSCA): Federal Register for Tuesday, April 12, 2022 (87 Fed. Reg. 21,706) [FRL-8332-02-OCSPP]

The Alliance for Automotive Innovation, the American Coatings Association, the American Forest & Paper Association, the Motor & Equipment Manufacturers Association, the National Automobile Dealers Association, the Toy Association, and the U.S. Tire Manufacturers Association (collectively "the Trade Associations") appreciate the opportunity to provide comments on the Environmental Protection Agency's (EPA) first risk management proposal issued after the passage of the Lautenberg Chemical Safety Act (LCSA). These associations represent a broad cross-section of U.S. industry, and together speak for thousands of their respective individual member companies that are product and product component manufacturers and companies involved in the downstream consumer and commercial product supply chain.[1] A detailed description of each of the Trade Associations is enclosed.

This proposed rule (herein after "the rule") reflects the first time that EPA is interpreting key sections of the LCSA including TSCA section 6(c)(2)(D) and TSCA section 6(c)(2)(E) in a risk management rule and applying key policy shifts announced on June 30, 2021, by the Office of Chemical Safety and Pollution Prevention (OCSPP). These key policy shifts include expanding consideration of exposure pathways and fence line community exposure screening level approaches, assumptions regarding the use of personal protective equipment, and adoption of a whole chemical approach when assessing risk.

The precedent-setting policy choices that EPA has adopted in this rule could very well establish a presumption of appropriateness for future proposed and final risk management rules issued under TSCA section 6. It is critical that EPA adhere to the statutory language of the LCSA as well as the intent of the drafters and signatories to that language. Merely citing the statutory language of TSCA without providing the underlying analysis that supports EPA's findings is unacceptable and fails to meet the requirements of the statute.

[1] Each association is a not-for-profit organization serving as a collective voice for their respective members.

The Trade Associations' comments here focus specifically on the precedent-setting issues that this rule proposes to establish. These comments are not chemical-specific and address issues that pertain to this and to future EPA risk management actions proposed and/or finalized under TSCA. These include:

- Decision Not to Exempt Articles from Prohibitions and Other Restrictions
- Decision Not to Exempt Replacement Parts from Prohibitions and Other Restrictions
- Assumptions that Personal Protective Equipment (PPE) Is Not Routinely Used
- No Consideration of Minimal Risks Associated with *De Minimis* Levels
- Exemptions for Impurities and Byproducts
- Regrettable Substitution
- OSHA Occupational Authorities vs. TSCA Scope
- EPA's Adoption of a Whole Chemical Approach

I. Decision Not to Exempt Articles from Prohibitions and Other Restrictions

The Trade Associations believe that EPA has not assessed the risks associated with articles as separate from the chemical itself and has proposed risk mitigation measures that do not meet the requirements of TSCA section 6(c)(2)(E).

TSCA section 6(c)(2)(E) states that in selecting among prohibitions and other restrictions, the Administrator shall apply such prohibitions or other restrictions to an article or category of articles containing the chemical substance or mixture ***only to the extent necessary to address the identified risks from exposure to the chemical substance or mixture from the article or category of articles*** [emphasis added] so that the substance or mixture does not present an unreasonable risk of injury to health or the environment identified in the risk evaluation conducted in accordance with section 6(b)(4)(A).

In its proposed rule, EPA provides the following justification for including all articles in its regulatory net:

> [A]ll of the other conditions of use that are the subject of this proposed regulation involve the use and/or disposal of products or articles . . . For each condition of use, the article is subject to circumstances during use that change or alter the article as a direct result of the use. Releases . . . and the associated unreasonable risks from exposure . . . identified in the risk evaluation, result from use of the articles. . . . The risk evaluation determined that exposure to workers, ONUs, consumers and bystanders can occur when these items are replaced or repaired, resulting in harmful exposures. These identified risks from articles
> . . . could result from exposure of any kind and, as a result, EPA had no feasible option to prevent these risks other than a complete prohibition. In particular, no other restriction EPA researched could sufficiently prevent unreasonable risk to ONUs, consumers, and bystanders who were not expected to wear respiratory

> protection. Accordingly, EPA's proposed regulatory action sets requirements for articles only to the extent necessary to address the identified risks . . . .[2]

In EPA's final risk evaluation[3] intended to provide the basis for this rule, there is no explicit assessment of articles. EPA's determinations regarding articles rely on the hazards and exposure potential and subsequent risk of the chemical itself and not on the individual articles in which the chemical may be present. The proposed actions do not articulate how articles and their use were assessed and how EPA determined that the proposed action meets the "only to the extent necessary" requirement. There is no assessment of each individual article or even of a category of articles. Neither the associated risk evaluation nor this rule presents the analytical steps that EPA undertook to reach its determination that "EPA had no feasible option to prevent these risks other than a complete prohibition."[4]

As this is the first risk management rule proposed under the LCSA, EPA must be aware that it is proposing to set precedent as to how subsequent and final risk management actions will be developed. The dearth of analysis supporting EPA's conclusion that articles must be regulated is extremely troublesome. TSCA section 6(c)(2)(E) was included in the LCSA to address the need to assess articles and their use as distinct and separate from the chemical being evaluated and directs EPA to take a more focused and narrow approach when identifying articles that EPA believes need to be managed under TSCA sections 4, 5 or 6. Articles do not present the same opportunities for potential exposure that a chemical itself may provide, and consequently the risk associated with any articles needs to be assessed on an article- and use-specific basis. EPA itself has acknowledged that the risk associated with a substance embedded in an article is significantly less than that of a chemical substance or mixture imported in bulk.

> As was discussed in the preamble to these reproposed regulations (42 FR 39185), comments from industry and trade associations argued that it would be extremely burdensome for importers to identify the chemical substances contained in the articles they import. . . . ***Finally, because of its form, the health and environmental risk posed by a chemical substance imported in an article may be less than the risk posed by a chemical substance imported in bulk or in a mixture.***[5]

During numerous meetings with staff from OCSPP, the Trade Associations requested that EPA provide guidance on how it would implement TSCA section 6(c)(2)(E). During those meetings we were advised (and assured) that EPA's implementation approach would be addressed during the risk management process. However, in this first TSCA risk management action since the passage of the LCSA, EPA does not present any assessment of how it determined that the proposed risk management action meets the standard that "the Administrator shall apply such prohibitions or other restrictions to an article or category of articles containing the chemical substance or mixture only to the extent necessary to address the identified risks from exposure to the chemical substance or mixture from the article or category of articles so that the substance or

[2] 87 Fed. Reg. 21,706 (Apr. 12, 2022).
[3] Risk Evaluation (Dec. 2020), *available at* https://bit.ly/3OXDrcI.
[4] 87 Fed. Reg. at 21,706.
[5] 42 Fed. Reg. 53,804, 53,805 (Oct. 3, 1977) (emphasis added).

mixture does not present an unreasonable risk of injury to health or the environment identified in the risk evaluation conducted in accordance with section 6(b)(4)(A)."[6]

EPA's failure to articulate the steps that it took to meet the assessment requirements of TSCA section 6(c)(2)(E) denies commenters the ability to understand how EPA reached its risk management approach for articles and to provide input on the appropriateness of EPA's interpretation and implementation of this key TSCA provision for this and future TSCA risk management determinations. The regulation of articles is a relatively new risk management activity under TSCA. EPA's first final rule regulating imported articles was issued in 2020.[7] Given the critical importance of this TSCA provision and the multitude of industries and hundreds of thousands of articles that it will potentially impact, more than the brief conclusory statement in this rule is necessary to support EPA's findings.

As we have requested in the past, we believe that EPA needs to provide guidance on how it will implement TSCA section 6(c)(2)(E) and issue that guidance for comment. This is a crucial section of TSCA that was added to ensure that articles would be regulated based on their potential risk and not lumped in with the assessment of risk from a chemical itself. Additionally, EPA's assessment of individual articles needs to be clearly explained in each risk assessment, and each risk management action must clearly demonstrate the relationship between the risk(s) potentially posed by articles and the risk management action.

II. Decision Not to Exempt Replacement Part Prohibitions and Other Restrictions

The Trade Associations believe that EPA has not assessed the risks associated with replacement parts as separate from the chemical itself and has proposed risk mitigation measures that do not meet the requirements of TSCA section 6(c)(2)(D).

TSCA section 6(c)(2)(D) states that the Administrator "shall" exempt replacement parts unless the Administrator makes the findings contained in TSCA section 6(c)(2)(D):

> The Administrator ***shall*** exempt replacement parts for complex durable goods and complex consumer goods that are designed prior to the date of publication in the Federal Register of the rule under subsection (a), unless the Administrator finds that such replacement parts ***contribute significantly to the risk, identified in a risk evaluation conducted under subsection (b)(4)(A)***, to the general population or to an identified potentially exposed or susceptible subpopulation. (emphasis added)

In neither the associated risk evaluation for this rule nor the proposal itself does EPA present the assessment of replacement parts and how they as an individual category of use (COU) contribute significantly to the risk identified in the risk evaluation. Instead, EPA states that the presence of the chemical of concern (COC) in replacement parts has diminished significantly over the years and is expected to continue to decrease.[8]

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[6] TSCA section 6(c)(2)(E).
[7] Significant New Use Rule: Long-Chain Perfluoroalkyl Carboxylate and Perfluoroalkyl Sulfonate Chemical Substances, https://www.regulations.gov/document/EPA-HQ-OPPT-2013-0225-0232.
[8] Risk Evaluation (Dec. 2020), *available at* https://bit.ly/3OXDrcI.

The precedent that would be set by this rule is of concern to our members. More than a statement of findings is necessary to support a determination that TSCA section 6(c)(2)(D) does not apply.

> EPA proposes to find that the replacement parts contribute significantly to the identified unreasonable risk for these conditions of use to the potentially exposed or susceptible subpopulations identified in the risk evaluation. Accordingly, EPA is not exempting replacement parts from regulation in the proposed rule.[9]

EPA's failure to articulate the steps that it took to meet the assessment requirements of TSCA section 6(c)(2)(D) denies commenters the ability to understand how EPA reached its risk management approach for replacement parts and to provide input on the appropriateness of EPA's interpretation and implementation of this key TSCA provision for future TSCA risk management determinations.

Therefore, we request that EPA assess the risk associated with replacement parts as required by TSCA section 6(c)(2)(D) as a distinct and separate COU and show how replacement parts as a standalone category contribute significantly to risk.

III. Assumptions that Personal Protective Equipment (PPE) Is Not Routinely Used

The Trade Associations believe that adopting an assumption during the risk assessment phase that no PPE is used has the potential to overestimate risk and ignores the multiple other worker safety practices employed by our members in their facilities, including limiting worker exposure through system design, work practices, and engineering controls.

In the initially issued final risk evaluations for its first 10 Work Plan chemicals, EPA estimates of worker exposure were calculated both with and without the use of PPE, assuming the use of PPE as stipulated by Occupational Safety & Health Administration (OSHA) standards. EPA has determined since that it is now more appropriate, when conducting risk evaluations, to assume that PPE is not used by workers, and to instead consider information related to PPE during the risk management phase. This new approach is reflected in a June 30, 2021, press release announcing EPA's new approach to risk evaluations:

> In the final risk evaluations for the first 10 chemicals, the previous administration generally assumed that workers were always provided, and used, personal protective equipment (PPE) appropriately. However, data on violations of PPE use suggest that assumptions that PPE is always provided to workers, and worn properly, are not justified. ***Continued use of this assumption could result in risk evaluations that underestimate the risk*****,** and in turn, risk management rules may not provide the needed protections.
>
> ***EPA is therefore revisiting the assumption that PPE is always used in occupational settings when making risk determinations*** for a chemical. Instead, the agency plans to consider information on use of PPE, or other ways industry

[9] 87 Fed. Reg. at 21,706.

> protects its workers, as a ***potential way to address unreasonable risk during the risk management process.***
>
> The first 10 risk evaluations already include exposure analysis with and without PPE.[10]

EPA further clarifies this approach in the draft revisions to the HBCD risk evaluation:

> Making unreasonable risk determinations based on the baseline scenario should not be viewed as an indication that EPA believes there are no occupational safety protections in place at any location, or that there is widespread non-compliance with applicable OSHA standards. Rather, it reflects EPA's recognition that unreasonable risk may exist for subpopulations of workers that may be highly exposed because they are not covered by OSHA standards, such as self-employed individuals and public sector workers who are not covered by a State Plan, or because their employer is out of compliance with OSHA standards, or because EPA finds unreasonable risk for purposes of TSCA notwithstanding OSHA requirements.[11]

By adopting this approach, EPA fails to recognize that many other worker safety practices are in place at our facilities – many of which are more protective than traditional PPE. Our facilities strive as a first step to eliminate or control all serious potential hazards. We select controls according to a hierarchy that emphasizes engineering solutions (including elimination or substitution) first, followed by safe work practices, the use of certification and training as a tool for risk management, administrative controls, and finally PPE. Our facilities follow OSHA mandates and where PPE is required, we strive to comply with those requirements. If EPA believes that some facilities may not follow OSHA requirements, then EPA needs to identify those facilities and target risk mitigation to those facilities.

> When undertaking unreasonable risk determinations as part of TSCA risk evaluations, EPA cannot assume as a general matter that an applicable OSHA requirement or industry practice is consistently and always properly applied. Mitigation scenarios included in the EPA risk evaluation (*e.g.,* scenarios considering use of PPE) likely represent what is happening already in some facilities. However, the Agency cannot assume that all facilities will have adopted these practices for the purposes of making the TSCA risk determination.[12]

Further, if EPA believes that assuming the use of PPE in workplace facilities will underestimate potential exposure to certain subpopulations of workers, assuming no use of PPE in any workplace will certainly overestimate worker exposure. This approach doesn't appear to fix a perceived problem but rather replace it with a potentially greater problem – creating a false and misleading perception of worker risk. If EPA believes that workers not covered by OSHA

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[10] EPA, "EPA Announces Path Forward for TSCA Chemical Risk Evaluations." *Press Release*, June 30, 2021. https://www.epa.gov/newsreleases/epa-announces-path-forward-tsca-chemical-risk-evaluations (emphasis added).
[11] 86 Fed. Reg. at 74,082.
[12] 87 Fed. Reg. at 21,706.

standards are at a greater exposure risk, using TSCA in place of the Occupational Safety and Health Act (OSH Act) through this workaround approach is overreaching and inappropriate, as further detailed below.

IV. No Consideration of Minimal Risks Associated with *De Minimis* Levels

The Trade Associations are concerned that EPA did not address circumstances where a *de minimis* level of a chemical may result in no risk or a negligible risk. There may be circumstances where chemicals may be present in minute levels that do not pose a risk to human health or the environment, as the exposure levels would be well below any level of concern.

Nowhere in the risk evaluation of the proposed risk management rule does EPA address how they have addressed (or will address in future evaluations and rules) exposures that fall below a No Observable Effect Level (NOEL). While this may not be appropriate for all chemicals, given that this is the first TSCA section 6 risk management proposal since the passage of the LCSA, there should be some discussion and recognition of NOELs and how EPA will compare *de minimis* levels in articles and mixtures to the NOEL for each chemical.

We request that EPA address the generic issue of *de minimis* levels of a chemical and how EPA will differentiate between exposure levels that exceed the NOEL and exposure levels that fall below the NOEL.

V. Exemptions for Impurities and Byproducts

The Trade Associations are concerned that there was no discussion as to whether EPA would consider an exemption for impurities and byproducts in any future risk management activity. Chemicals in these two categories are generally exempt from other regulatory schemes. For example, impurities and byproducts are exempt from PMN reporting under 40 C.F.R. § 720.30(h). In addition, a byproduct that is not used for a commercial purpose after it is manufactured was not required to be listed on the TSCA Inventory (40 C.F.R. § 710.4(d)(2)).

Requiring companies to gather information on impurities or byproducts in order to assure compliance with a risk management requirement would take substantial resources and a significant amount of time on the part of producers, importers, and suppliers with very little, if any, environmental benefit.

We request that EPA address the issue of impurities and byproducts and consider exemptions for these two categories in future TSCA Section 6 rules unless EPA determines that they, in and of themselves, pose a substantial risk to health and or the environment.

VI. Movement Toward Regrettable Substitution

EPA is suggesting that the substitutes available may increase PFAS in the environment.

> EPA lacks information to determine whether this proposed regulation would increase usage and associated release of PFAS compounds.[13]

The Trade Associations are concerned that proposing an alternative that is also currently under consideration for regulation by EPA does not meet the standard in TSCA section 6(C).

> 6(C) CONSIDERATION OF ALTERNATIVES.—Based on the information published under subparagraph (A), in deciding whether to prohibit or restrict in a manner that substantially prevents a specific condition of use of a chemical substance or mixture, and in setting an appropriate transitional period for such action, the Administrator shall consider, to the extent practicable, whether technically and economically feasible **alternatives that benefit health or the environment, compared to the use so proposed to be prohibited or restricted, will be reasonably available** as a substitute when the proposed prohibition or restriction takes effect. (emphasis added)

EPA needs to identify substitutes that "benefit health or the environment" compared to the chemical or its use that is proposed to be prohibited. Switching to alternative chemicals and processes is not an easy or inexpensive exercise. It requires a significant time investment in designing, testing and implementing new technologies, as well as substantial financial resources. In this case, to recommend an alternative that EPA acknowledges could increase PFAS compounds in the environment is to direct a number of industries to substitutes that may become unavailable or severely regulated in the near future.

We request that EPA follow the intent of TSCA section 6(C) and only identify substitutes that benefit health or the environment, compared to the chemical and use proposed to be prohibited or restricted, and that will be reasonably available in the long term. Where such substitutes are not available, EPA needs to acknowledge that no reasonable substitutes are available and factor that into their analysis and risk management decisions.

VII. OSHA Occupational Authorities vs. TSCA Scope

The Trade Associations question why EPA believes it is appropriate to supersede OSHA's responsibilities under the OSH Act and instead use TSCA authorities to address worker risk.

> OSHA's mission is to ensure that employees work in safe and healthful conditions. The OSH Act establishes requirements that each employer comply with the General Duty Clause of the Act (29 U.S.C. 654(a)), as well as with occupational safety and health standards issued under the Act.[14]

It is unclear why EPA is proposing to take over OSHA's role vs. working with OSHA to provide appropriate and necessary fixes under the OSH Act and other applicable law. The more straightforward approach would be to identify real and actual risks and then to coordinate with OSHA to update and enforce its requirements and compliance program,

[13] 87 Fed. Reg. at 21,709.
[14] 87 Fed. Reg. at 21,711.

as appropriate under the OSH Act. For workers not covered by OSHA standards, we recommend that EPA work with OSHA to find an appropriate means for providing any necessary requirements, preferably under the OSH Act, if unreasonable risk is determined.

Further, if EPA believes that certain workplace risks are not being adequately controlled, then EPA has an obligation under TSCA section 9(a) to consult with OSHA before superseding OSHA authority. Any such result from coordination and consultation with OSHA should also be made publicly available to further transparency, process, and due diligence. Any such information has not been made available to the public, i.e., via the docket, to date, as would be expected under the requirements of 15 U.S.C. § 2608.[15]

VIII. EPA's Adoption of a Whole Chemical Approach: A Change in Approach from the Final Rule Governing Procedures for Chemical Risk Evaluation Under the Amended Toxic Substances Control Act

The 2016 LCSA amendments to TSCA were designed for EPA to identify and make risk determinations for conditions of use of a chemical that present unreasonable risk as well as those that do not present an unreasonable risk. EPA's approach to risk evaluation was published in a Final Rule "Procedures for Chemical Risk Evaluation Under the Amended Toxic Substances Control Act" issued on September 18, 2017.[16]

> TSCA section 6(b)(4) requires EPA to establish, by rule, a process to conduct risk evaluations. Specifically, EPA is directed to use this process to "determine whether a chemical substance presents an unreasonable risk of injury to health or the environment, without consideration of costs or other non-risk factors, including an unreasonable risk to a potentially exposed or susceptible subpopulation identified as relevant to the risk evaluation by the Administrator **under the conditions of use**.[17]

On June 30, 2021, EPA issued a press announcement, during the middle of the process for assessing the first 10 high priority chemicals selected by EPA. These changes, including most notably EPA's decision to apply a single "whole chemical" unreasonable risk determination,

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[15] 15 U.S.C. § 2608(a)(1) states that: "…the Administrator shall submit to the agency which administers such law a report which describes such risk and includes in such description a specification of the activity or combination of activities which the Administrator has reason to believe so presents such risk. Such report shall also request such agency—

(A)
(i) to determine if the risk described in such report may be prevented or reduced to a sufficient extent by action taken under such law, and
(ii) if the agency determines that such risk may be so prevented or reduced, to issue an order declaring whether or not the activity or combination of activities specified in the description of such risk presents such risk; and

(B) to respond to the Administrator with respect to the matters described in subparagraph (A).

Any report of the Administrator shall include a detailed statement of the information on which it is based and shall be published in the Federal Register."

[16] 82 Fed. Reg. at 33,726.

[17] 82 Fed. Reg. at 33,726 (emphasis added).

when there are conditions of use that EPA has previously determined to not present an unreasonable risk, are wholly inconsistent with the process adopted by EPA in the 2017 rule – a rule vetted through a full notice and comment regulatory process.

We recommend that any changes to a process developed through a notice and comment rulemaking should be proposed in a revised rulemaking that allows for public engagement. A press announcement cannot be used to modify a final rule.

In conclusion, while the Trade Associations jointly have no comment on the chemical-specific findings and related risk management proposal at this time, we have significant concerns about EPA's precedent-setting interpretation and application of certain TSCA provisions, as well as EPA's independently developed new risk assessment approaches that influence the outcome of risk management decisions. The policy changes that EPA has adopted during this rulemaking are significant and warrant more in-depth discussion and rationale than EPA has provided in this rule. They are stand-alone, critical issues that will impact and shape TSCA risk management actions for the foreseeable future and as such warrant independent notice and comment opportunities.

We welcome the opportunity to provide further clarification on our concerns and recommendations.

Respectfully submitted,

Alliance for Automotive Innovation
American Coatings Association
American Forest & Paper Association
Motor & Equipment Manufacturers Association
National Automobile Dealers Association
The Toy Association
U.S. Tire Manufacturers Association

CC: Mark Hartman, Peter Gimlin

Attachment

About the Signatory Trade Associations

Alliance for Automotive Innovation (Auto Innovators)
Formed in 2020, the Alliance for Automotive Innovation is the singular, authoritative, and respected voice of the automotive industry. Focused on creating a safe and transformative path for sustainable industry growth, the Alliance for Automotive Innovation represents the manufacturers producing nearly 98% of cars and light trucks sold in the United States, original equipment suppliers, as well as technology and other automotive-related companies. The newly established organization, a combination of the Association of Global Automakers and the Alliance of Automobile Manufacturers, is directly involved in regulatory and policy matters impacting the light-duty vehicle market across the country. The auto industry plays an important and critical role to our nation's economy, accounting for 10 million jobs and 5.5% of the annual Gross Domestic Product. The Alliance for Automotive Innovation is headquartered in Washington, DC, with offices in Detroit, MI and Sacramento, CA. For more information, visit our website http://www.autosinnovate.org.

American Coatings Association (ACA)
ACA (American Coatings Association) is a voluntary, non-profit trade association working to advance the needs of the paint and coatings industry and the professionals who work in it. The organization represents paint and coatings manufacturers, raw materials suppliers, distributors, and technical professionals. ACA serves as an advocate and ally for members on legislative, regulatory and judicial issues, and provides forums for the advancement and promotion of the industry through educational and professional development services. ACA's membership represents over 90 percent of the total domestic production of paints and coatings in the country.

American Forest & Paper Association (AF&PA)
The American Forest & Paper Association (AF&PA) serves to advance a sustainable U.S. pulp, paper, packaging, tissue and wood products manufacturing industry through fact-based public policy and marketplace advocacy. AF&PA member companies make products essential for everyday life from renewable and recyclable resources and are committed to continuous improvement through the industry's sustainability initiative — Better Practices, Better Planet 2020. The forest products industry accounts for approximately four percent of the total U.S. manufacturing GDP, manufactures nearly $300 billion in products annually and employs approximately 950,000 men and women. The industry meets a payroll of approximately $55 billion annually and is among the top 10 manufacturing sector employers in 45 states.

Motor & Equipment Manufacturers Association (MEMA)
The Motor & Equipment Manufacturers Association (MEMA) represents more than 900 members that manufacture motor vehicle systems and component parts for the original equipment and aftermarket segments of the light vehicle and heavy- duty industries. Motor vehicle suppliers provide over 77 percent of the value of a new vehicle and more than 900,000 jobs are directly supported by the motor vehicle supplier industry in all 50 states. MEMA represents its members through four divisions: Automotive Aftermarket Suppliers Association (AASA); Heavy Duty Manufacturers Association (HDMA); MERA – The Association for Sustainable Manufacturing; and the Original Equipment Suppliers Association (OESA).

National Automobile Dealers Association (NADA)
NADA represents over 16,000 franchised dealers who sell new and used motor vehicles and engage in service, repair, and parts sales, including 1,800 who sell medium- and/or heavy-duty trucks. Together they employ approximately 1,200,000 people nationwide, with the majority being small businesses as defined by the Small Business Administration.

The Toy Association
The Toy Association is the North America-based trade association for the toy sector; our membership includes more than 950 businesses – from inventors and designers of toys to toy manufacturers and importers, retailers, and safety testing labs – all involved in bringing safe, fun toys and games to children. The toy sector is a global industry of more than US$90 billion annually, and our members account for more than half this amount, and approximately 90% of North American toy sales by dollar volume. Toy safety is the top priority for The Toy Association and its members. Since the 1930s, we have served as leaders in global toy safety efforts; in the 1970s we helped to create the first comprehensive toy safety standard, which was later adopted under the auspices of ASTM International as ASTM F963. The ASTM F963 Toy Safety Standard has been recognized in the United States and internationally as an effective safety standard, and it serves as a model for other countries looking to safeguard the health and safety of their citizens with protective standards for children. The Toy Association is committed to working with legislators and regulators around the world to reduce barriers to trade and to achieve the international alignment and harmonization of risk-based standards that will provide a high level of confidence that toys from any source can be trusted as safe for use by children. Standards alignment assures open markets between nations to maximize product availability and choice.

U.S. Tire Manufacturers Association
USTMA is the national trade association for tire manufacturers that produce tires in the U.S. Our 13 member companies operate 58 tire-related manufacturing facilities in 17 states and generate over $27 billion in annual sales. We directly support more than a quarter million tire manufacturing U.S. jobs – totaling almost $20 billion in wages. USTMA advances a sustainable tire manufacturing industry through thought leadership and a commitment to science-based public policy advocacy. Our member company tires make mobility possible. USTMA members are committed to continuous improvement of the performance of our products, worker and consumer safety and environmental stewardship.

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