December 5, 2024

The Honorable Donald J. Trump
President-Elect of the United States

Dear President-Elect Trump,

Manufacturers in America are ready to help you deliver on your promise to make the United States the best place in the world to build, grow and create jobs. Manufacturing is at the heart of our economy, employing nearly 13 million people in America, supporting local communities and developing innovative new products that make life better for everyone.

Right now, regulations are strangling our economy. Manufacturers are shouldering enormous regulatory compliance costs—nearly $350 billion annually, or 12% of our entire sector's contribution to U.S. GDP. For smaller manufacturers, these costs can exceed $50,000 per employee each year. This means that a small manufacturer with just 20 employees pays $1 million per year to comply with federal regulations—rather than investing those funds in raises or new jobs.

The regulatory onslaught reached a fever pitch during the Biden administration. Prior to the election, the National Association of Manufacturers surveyed the industry and found a significant decline in optimism among manufacturers, with an unfavorable business climate, particularly taxes and regulations, cited as a primary business challenge by more than 60% of respondents.

You have the opportunity to tackle this challenge by addressing burdensome regulations that are stifling investment, making us less competitive in the world, limiting innovation and threatening the very jobs we are all working to create right here in America.

To help your administration create more manufacturing jobs in America, we respectfully submit this list of regulatory actions that will set the stage for industrial growth in the United States.

This list includes some of the highest-priority regulations that need immediate action. While many of these items will require cutting red tape, we note that regulations can have benefits as well: manufacturers depend on balanced, workable rules of the road and the regulatory certainty that comes with them.

We look forward to working with your administration to ensure that manufacturers in the United States have the freedom and certainty they need to drive growth, invest in people and technology and strengthen our communities.

* * * *

APPROACH TO REGULATORY POLICY

Ask: Stop the trend of overreaching regulations that seek to expand agencies' authority; instead, focus on tailored rulemakings that implement statutory directives in a manner consistent with congressional intent.

It is time for a regulatory reset.

This is especially true given the Supreme Court's recent decision in *Loper Bright Enterprises v. Raimondo*. While it has always been the case that federal agencies cannot exercise authority beyond what Congress has authorized in statute, *Loper Bright* made clear that agencies can no longer exploit statutory gaps or ambiguities to enact overreaching rules or regulations. The Supreme Court has further emphasized, via *West Virginia v. EPA*, that agencies should tread especially lightly when asserting broad or novel authority or enacting policy with vast economic or political significance.

Additionally, allowing stakeholder input, consistent with the Administrative Procedure Act, will guard against arbitrary and capricious rulemaking, while a robust notice-and-comment process will bolster any final rules' legal stability and ensure that agencies have access to the full range of data, analysis and expertise that the manufacturing industry has to offer. Similarly, engaging in reasoned decision-making that considers all relevant factors, including cost, will help ensure that any final rules are compliant with the APA and practical for manufacturers to comply with.

A sound approach to regulations can provide certainty to manufacturers and ensure that our industry can continue to make the long-term investments that drive job creation, growth and economic competitiveness here in the United States.

Ask: Enhance agency coordination and industry engagement.

Manufacturers stand ready to partner with your administration on workable regulations that achieve important policy goals without imposing overly burdensome and impractical requirements on our sector. To support a robust partnership between the business community and the administration, we urge you to ensure that a senior-level advisor within your White House is responsible for convening business stakeholders and coordinating among federal agencies. Agency coordination should prevent duplicative, overlapping, or conflicting rules, while engagement with manufacturers and other businesses should ensure feasible, balanced requirements—both crucial to the growth of manufacturing in America. Additionally, the Office of Information and Regulatory Affairs has an important role to play in ensuring that regulations are properly reviewed by your administration and that they incorporate the requisite cost-benefit, small business impact and feasibility analyses—ensuring efficient, evidence-based and sustainable regulations.

EXECUTIVE ACTIONS

LNG Export Ban

Ask: Lift the pause on Day One of your administration through an updated national interest assessment.

Manufacturers believe that liquefied natural gas exports are squarely within the United States' national interest. A recent study[1] commissioned by the NAM found that a prolonged pause on LNG exports places 900,000 jobs and $250 billion in GDP at risk and creates a ripple effect across multiple sectors, including manufacturing, energy and infrastructure.

The Biden administration has put in place just such a pause on LNG exports, which you can undo.[2] LNG has become a crucial driver of economic growth and global energy stability, and the ongoing pause will severely undercut America's competitive edge. Using your authority under the Natural Gas Act, you and your incoming Energy Secretary should use the strong economic data, and robust scientific data around LNG's reduced emissions impacts, to clearly declare that approval of LNG export facilities is squarely in the national interest.

Permitting

Ask: Appoint an official within your administration to help coordinate policies across the executive branch to ease the permitting burden. Specifically, your administration should start by prioritizing a reconsideration of the "NEPA Phase 2 Rule"[3] and the current implementation of the permitting reform provisions of the Fiscal Responsibility Act.

The United States' out-of-date permitting laws and procedures are holding back progress and restricting manufacturers' ability to compete globally. Permitting delays, red tape and complicated bureaucracy make it more difficult to modernize infrastructure, expand energy generation and production and shore up our supply chains. In modernizing and updating our nation's antiquated permitting system, your administration should prioritize:

- Expediting judicial review;
- Accelerating the permit process for needed energy infrastructure, including more transmission lines, pipelines and permanent carbon sequestration sites;
- Providing regulatory certainty;
- Creating enforceable deadlines;
- Increasing the use of categorical exclusions to the National Environmental Policy Act process;
- Unlocking access to domestic mining for energy and strategic materials, including on federal lands;

---

[1] *Quantifying America's Economic and Energy Opportunity through LNG Exports*, PwC (October 2024). *Available at* https://nam.org/wp-content/uploads/2024/10/Quantifying-Americas-Economic-and-Energy-Opportunity-through-LNG-Exports.pdf.

[2] *DOE to Update Public Interest Analysis to Enhance National Security, Achieve Clean Energy Goals and Continue Support for Global Allies*, Department of Energy (26 January 2024). *Available at* https://www.energy.gov/articles/doe-update-public-interest-analysis-enhance-national-security-achieve-clean-energy-goals.

[3] *National Environmental Policy Act Implementing Regulations Revisions Phase 2*, 89 Fed. Reg. 35442 (1 May 2024). RIN 0331-AA07; *available at* https://www.govinfo.gov/content/pkg/FR-2024-05-01/pdf/2024-08792.pdf.

- Streamlining the Clean Water Act to ensure attainable standards and a workable permit process;
- Modernizing the Clean Air Act's New Source Review and Prevention of Significant Deterioration permitting programs to use best available data and robust science in air quality modeling; and
- Reforming the Endangered Species Act.

UN Global Plastics Treaty
Ask: Maintain U.S. global leadership in negotiating a strong, workable treaty that supports American industry and manufacturing supply chains.

Plastic is a critical component to the modern world and is used in every sector. Manufacturers are committed to ensuring the plastic supply chain is sustainable. This requires the right policy drivers and enabling environment. Recently, the Biden administration changed the long-standing U.S. negotiating position in favor of including duplicative lists of "chemicals of concern" and "problematic plastics" applications in this treaty. Your administration should remain at the negotiating table but return to the previous U.S. position focused on implementing demand-side policies such as improving product design and circularity and advancing consumer education to address plastic pollution.

ENERGY AND ENVIRONMENT REGULATIONS

National Ambient Air Quality Standards (PM2.5 NAAQS)
Ask: Reconsider and relax the Biden administration's particulate matter NAAQS rule.

The Biden administration's new NAAQS for PM2.5 rule lowered the primary annual standard from 12 micrograms per cubic meter to 9 micrograms per cubic meter. This is unrealistic and unworkable, and it will result in significantly diminished manufacturing investment and job creation. A PM2.5 standard of 8 micrograms per cubic meter of air—only slightly below the newly finalized level—would result in a loss of up to $200 billion in economic activity and almost 1 million jobs, according to research from the NAM.

A standard of 9 micrograms is below or very close to background levels of particulate matter in many parts of the country, and is now so low that industry could be expected to reduce emissions below naturally occurring levels while only representing about 15% of total PM emissions. The result of an overly stringent NAAQS level is that large swaths of the U.S. will either be forced into "nonattainment" status, or have insufficient permit "headroom" (even if technically in attainment) to obtain a permit. All of this would block critical infrastructure and investments in facility modernization and harm competitiveness, jobs and economic growth.

National Ambient Air Quality Standards (Ozone NAAQS)
Ask: Maintain both the primary and secondary standard for the ozone NAAQS at 70 parts per billion.

As required by statute, ozone NAAQS levels will need to be reconsidered in 2025. Lowering the ozone NAAQS below 70 parts per billion will seriously disadvantage manufacturers in the U.S. and make it significantly more difficult to make and expand investments that the U.S. will need to compete in the decades to come.

The European Union Ambient Air Quality Directives established an ozone level of 120 parts per billion,[4] more than 70% above the current U.S. level. Continuing to ratchet down the ozone NAAQS closer and closer to natural background levels leaves no room for manufacturers to permit new and expanded investments and create jobs. This has been the case for many manufacturers dealing with the new particulate matter NAAQS, and this mistake must be avoided for ozone.

Additionally, in many areas of the country sources of ozone precursor emissions are outside of the control of regulators, including wildfires and emissions drifting in from other countries such as China and Mexico. Along with maintaining the current ozone NAAQS, manufacturers urge your administration to take a serious look at revising outdated guidance on how wildfires and international emissions count against areas in non-attainment for ozone.

Power Plant Rules

Ask: Replace the EPA's rule for existing coal-fired and new natural gas-fired power plants with workable standards.[5]

The United States has an abundant supply of coal and natural gas, which account for almost 60%[6] of total U.S. energy consumption. Coal and natural gas provide our nation with critically needed affordable and reliable electricity. Unfortunately, this Biden administration rule threatens grid reliability because of the unrealistic timeline for power plants to adopt technologies within the next 10 years that have yet to be proven at scale. If these power plants cannot deploy carbon capture and storage and/or hydrogen co-firing technologies within this timeframe, they will be forced to retire. While manufacturers have been investing significantly to research, improve and deploy these technologies, the scale and timing that are needed to meet the new mandates are simply unachievable.

Given the growing demand for more electricity on the grid due to greater electrification and the growth of data centers, now is not the time to needlessly remove baseload generation from the grid, particularly affordable and reliable natural gas-fired generation. Your administration has the opportunity to reexamine and repeal this final rule and replace it with workable standards that are practicable and protective of human health and the environment.

Existing natural gas plants are critical to powering manufacturing in the United States because they are providing affordable and reliable energy to the grid.

---

[4] *European Commission Directive 2008/50/EC, Ambient air quality and cleaner air for Europe*, 2008 O.J. (L 152) 1. *Available at* https://eur-lex.europa.eu/eli/dir/2008/50/oj.

[5] *New Source Performance Standards for Greenhouse Gas Emissions from New, Modified and Reconstructed Fossil Fuel–Fired Electric-Generating Units; Emission Guidelines for Greenhouse Gas Emissions from Existing Fossil Fuel–Fired Electric Generating Units; and Repeal of the Affordable Clean Energy Rule*, 89 Fed. Reg. 39798 (5 May 2024). RIN 2060-AV09; *available at* https://www.govinfo.gov/content/pkg/FR-2024-05-09/pdf/2024-09233.pdf.

[6] U.S. Department of Energy, Energy Information Administration, *Electricity in the United States*, accessed 18 November 2024; *available at* https://www.eia.gov/energyexplained/electricity/electricity-in-the-us.php.

Air Emissions Reporting Requirements

Ask: Reverse the Biden administration's proposed updates to the Air Emissions Reporting Requirements.[7]

Manufacturers are concerned that the proposed AERR rule will impose significant barriers and unworkable requirements on manufacturers, which would hinder job creation. Under the proposed rule, emissions data submitted to the EPA will no longer qualify as confidential information. In certain industries, emissions data can reveal trade secrets and sensitive information about a facility's operations at any given time. This would undermine innovation and promote unfair competitive practices. The rule would also create a roadmap for litigation against manufacturers, which will make production more costly and could stifle the permitting of new or expanded facilities.

Waters of the United States

Ask: Ensure regulatory decision-making under the Clean Water Act fully conforms with the Supreme Court's bright-line jurisdictional test.

For decades, manufacturers have had to deal with uncertainty around the definitions and reach of key sections of the Clean Water Act, an issue that has consistently harmed manufacturers' ability to invest and grow jobs. Clear and consistent application of these rulings is essential for predictability for the sustained growth and innovation of American manufacturing. However, the EPA's current WOTUS rule[8] results in stakeholder confusion, relies on unclear terminology that is difficult to universally apply and leaves many permits in regulatory limbo. The Supreme Court was clear: a party asserting federal jurisdiction over wetlands must show an adjacent body of water constituting WOTUS and a continuous surface connection between the waters and the wetlands such that the two are indistinguishable. Specifically, in *Sackett* the Court found that waters of the United States are "only those relatively permanent, standing or continuously flowing bodies of water 'forming geographic[al] features' that are described in ordinary parlance as 'streams, oceans, rivers, and lakes,'"[9] and that wetlands may be included as a WOTUS only when they have "a continuous surface connection to bodies that are 'waters of the United States' in their own right, so that there is no clear demarcation between 'waters' and wetlands."[10] In light of this and the Court's recent decision in Lo*per Bright Enterprises v. Raimondo*, it is clear that the EPA's discretion to regulate waters of the United States is significantly narrower than what the EPA is currently attempting to enforce.

---

[7] *Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles-Phase 3*, 89 Fed. Reg. 29440 (22 April 2024). RIN 2060-AV50; *available at* https://www.govinfo.gov/content/pkg/FR-2024-04-22/pdf/2024-06809.pdf.

[8] *Revised Definition of "Waters of the United States"; Conforming*, 88 Fed. Reg. 61964 (8 September 2024). RIN 2040-AG32; *available at* https://www.govinfo.gov/content/pkg/FR-2023-09-08/pdf/2023-18929.pdf.

[9] *Sackett v. EPA, 598 U. S. 651 (2023), 1. Available at* https://www.supremecourt.gov/opinions/22pdf/21-454_4g15.pdf.

[10] *Ibid.*

New Source Review Rule

Ask: Reverse course on the Biden administration's proposed revisions to the Clean Air Act's New Source Review[11] preconstruction permitting program regulations.

The EPA has proposed revisions to the Clean Air Act's NSR preconstruction permitting program regulations, which would affect project emissions accounting, a process used to determine whether a modification at an existing facility triggers NSR permitting. The original intent of the Clean Air Act was to put the states in charge of reviewing permitting for minor sources. Because of this, the states have developed an effective application and permitting process for minor sources. Unfortunately, the proposed revisions are part of a trend at the EPA wherein the agency issues new burdensome reporting and permitting requirements that affect all industries and infringe on states' ability to make timely decisions when it comes to projects. This is a dangerous precedent that would add additional review time to minor projects and would undermine certainty in issued permits.

Clean Air Act Section 112

Ask: Return to the 2020 interpretation of Section 112 of the Clean Air Act.

Recently the Biden administration's EPA finalized a regulation[12] that reinstates the misguided "once in, always in" principle for facilities covered by Section 112 of the Clean Air Act. The rule disallows facilities that reduce their actual or potential emissions below the "major" source threshold from being reclassified as "area" sources. This policy, originally implemented in 1995, was formally overturned in a 2020 EPA rulemaking and was then updated by the Biden administration in 2024 to hew much closer to the incorrect 1995 interpretation.

This rulemaking is inconsistent with a plain reading of the Clean Air Act. In defining "major" and "area" sources, the Act does not contain any language that would temporally "fix" a source's status, nor does the statute contain language that prohibits a source from changing its classification status.

Manufacturers are committed to the communities in which they live and serve, and are dedicated to protecting the health, safety and vibrancy of those communities. Not only is this the correct legal standard, but it will also reduce unnecessarily burdensome regulations and allow manufacturers to innovate and implement voluntary measures to ensure strong compliance with the statute.

Ask: Rethink the Risk and Technology Review regulations developed by the EPA to consider all relevant factors including balancing costs and health risk when determining whether to set new Maximum Achievable Control Technology standards.

The Risk and Technology Review regulations under Section 112 of the Clean Air Act are designed to establish limits for hazardous air pollutants emitted from a large number of

---

[11] *Clarifying the Scope of "Applicable Requirements" Under State Operating Permit Programs and the Federal Operating Permit Program*, 89 Fed. Reg. 1150 (9 January 2024). RIN 2060-AV61; *available at* https://www.govinfo.gov/content/pkg/FR-2024-01-09/pdf/2023-27759.pdf.

[12] *Review of Final Rule Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act*, 89 Fed. Reg. 73293 (10 September 2024). RIN 2060-AV20; *available at* https://www.govinfo.gov/content/pkg/FR-2024-09-10/pdf/2024-20074.pdf.

industrial source categories. Under the Biden administration, the EPA promulgated strict and often technically unachievable and economically infeasible emission limits and work practices for many industries. These limits are based upon a misapplication of current law, resulting in onerous compliance costs despite there being no appreciable risk to human health. Many of these regulations had residual Risk and Technology Review final rules issued under your previous administration, but were since redone to include significantly more onerous requirements while lacking fulsome technical support and rationale for the changes. These regulations should be fully reconsidered by appropriately balancing costs and risks when establishing requirements, and administrative stays should be issued for recently promulgated MACTs for manufacturing sectors where costs exceed the benefits while the rules are reconsidered or remanded.

Additionally, as part of the EPA's periodic review of National Emissions Standards for Hazardous Air Pollutants, the EPA must "review and revise as necessary" those rules under Section 112(d)(6). The courts have interpreted similar statutory language as requiring an appropriate balancing of costs and benefits before imposing any new obligations. The recent Supreme Court decision in *Loper* further demonstrated the need for the EPA to change its approach when reviewing existing NESHAPs and reconsider or remand those recently promulgated. Nearly all industries have controls for their largest sources of air toxins, and the EPA has determined that any public health risks remaining are marginal and acceptable after extensive analysis. After investing millions in new air quality controls, the possibility of further obligations creates unnecessary regulatory uncertainty for globally competitive industries such as taconite, integrated iron and steel, coke making, chemicals, tires and forest products.[13,14,15]

IRA Energy Implementation

Ask: Engage with all sectors of manufacturing industry to understand how to ensure Inflation Reduction Act credits are impactful to American jobs and competitiveness.

Manufacturers opposed the tax and price control provisions of the IRA. However, the energy tax incentives in the law have spurred investments in new technologies that will power manufacturing growth for decades to come. A wholesale repeal of the credits will have a disastrous implication for these investments and the jobs that come with them. As such, manufacturers urge you to consider the positive impact that these incentives will have on U.S. industrial and economic growth.

---

[13] *National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing Facilities Technology Review*, 89 Fed. Reg. 23294 (3 April 2024). RIN 2060-AV82; *available at* https://www.govinfo.gov/content/pkg/FR-2024-04-03/pdf/2024-05850.pdf.

[14] *National Emission Standards for Hazardous Air Pollutants: Taconite Iron Ore Processing*, 89 Fed. Reg. 16408 (6 March 2024). RIN 2060-AV58; *available at* https://www.govinfo.gov/content/pkg/FR-2024-03-06/pdf/2024-02305.pdf.

[15] *National Emission Standards for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching, and Battery Stacks, and Coke Oven Batteries; Residual Risk and Technology Review, and Periodic Technology Review*, 89 Fed. Reg. 55684 (5 July 2024). RIN 2060-AV19; *available at* https://www.govinfo.gov/content/pkg/FR-2024-07-05/pdf/2024-13186.pdf.

Implementation of the ADVANCE Act and Nuclear Fuel Security Act Programs

Ask: Move quickly to implement the reforms included in the ADVANCE Act[16] and allow manufacturers to take advantage of clean and reliable nuclear energy to power their operations through programs under the Nuclear Fuel Security Act at the Department of Energy.

Nuclear-generated power is an important part of an all-of-the-above energy strategy, which is necessary to meet the power needs of a growing manufacturing sector. The Accelerating Deployment of Versatile, Advanced Nuclear for Clean Energy Act would accelerate the development and commercialization of advanced nuclear reactor technologies through reforms to the existing licensing and permitting systems. The Nuclear Fuel Security Act created new programs at the DOE to provide incentives for production of the fuel—known as high-assay, low-enriched uranium—which will be critical for advanced reactors but is largely produced in Russia.

It is critical that these laws be implemented quickly and properly to ensure manufacturers will be able to take advantage of clean and reliable nuclear energy to power their operations into the future.

Vehicle Regulations

Ask: Manufacturers urge your administration to provide the long-term regulatory certainty America's auto sector requires to meet all facets of customer demand while continuing to lead in innovation and emissions reduction.

A host of regulations have been issued over the past few years regarding vehicle emissions,[17,18,19] fuel economy,[20] and efficiency. Meanwhile, auto manufacturers have been working to ensure that a robust fleet of zero-emission, low-emission, hybrid and traditional ICE vehicles are available for American motorists.

Auto manufacturers operate over long planning horizons to develop, test and deliver their products to market, and what is most critical for the industry is ensuring regulatory certainty and stability. Whiplashing regulations between administrations makes it extremely difficult for auto manufacturers to comply given that companies often plan five or more model years out.

Additionally, regulations that either are unrealistic—by not considering refueling infrastructure, supply chain vulnerabilities and consumer preferences—or that undo regulations that companies have already made investment and product decisions to

---

[16] *S.1111, 118th Congress (2023-2024).*

[17] *National Performance Management Measures; Assessing Performance of the National Highway System, Greenhouse Gas Emissions Measure,* 88 Fed. Reg. 85364 (7 December 2023). RIN 2125-AF99; *available at* https://www.govinfo.gov/content/pkg/FR-2023-12-07/pdf/2023-26019.pdf.

[18] *Final Rule; Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles,* 89 Fed. Reg. 27842 (18 April 2024). RIN 2060-AV49; *available at* https://www.govinfo.gov/content/pkg/FR-2024-04-18/pdf/2024-06214.pdf.

[19] *Final Rule; Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles-Phase 3*, 89 Fed. Reg. 29440 (22 April 2024). RIN 2060-AV50; *available at* https://www.govinfo.gov/content/pkg/FR-2024-04-22/pdf/2024-06809.pdf.

[20] *Corporate Average Fuel Economy Standards for Passenger Cars and Light Trucks for Model Years 2027 and Beyond and Fuel Efficiency Standards for Heavy-Duty Pickup Trucks and Vans for Model Years 2030 and Beyond*, 89 Fed. Reg. 52540 (25 June 2024). RIN 2127-AM55; *available at* https://www.govinfo.gov/content/pkg/FR-2024-06-24/pdf/2024-12864.pdf.

comply with, fail to provide the policy framework to allow auto manufacturing in America to compete globally at the highest level.

FAR Council Climate Disclosure Rule

Ask: Do not finalize the Federal Acquisition Regulatory Council climate disclosure rule for manufacturers that serve as federal contractors.

The FAR Council's proposed rule[21] would require contractors to disclose their greenhouse gas emissions, including their so-called "Scope 3" emissions (those attributable to the suppliers and customers throughout a company's value chain)—a significant and infeasible burden that would have impacts on small and family-owned businesses throughout the manufacturing industry.

Contractors also would be required to set emissions-reduction targets that are validated as "science-based" by a third-party nongovernmental organization called the Science-Based Targets initiative, effectively outsourcing the federal government's contractor eligibility determinations to an unregulated entity with no interest in U.S. national security or economic growth.

CHEMICALS REGULATIONS

Ask: Work closely with manufacturers on a variety of chemicals regulations to ensure that the manufacturing supply chain can grow and compete globally.

Nowhere has the regulatory onslaught of recent years been clearer than in the suite of regulations that chemical manufacturers continue to face. Chemicals are a vital part of the entire manufacturing supply chain, from automotives to batteries and renewable energy to semiconductors and advanced medical applications. Chemicals are an irreplaceable part of a sustainable and strong manufacturing sector.

Over the past few years, federal agencies have continued to take an unscientific, sledgehammer approach to chemicals management policy while simultaneously undermining deadlines for the approval of new products. This leaves manufacturers and our supply chains open to considerable risk, increasing costs and impeding the production of critical products. Not only that, but it also puts manufacturers in America at a significant disadvantage relative to nations with whom we compete, especially those nations unfriendly to the U.S.

Below are four specific policy areas where enhanced collaboration would be beneficial for all stakeholders.

PFAS

The Biden administration has finalized a suite of overly burdensome and unworkable regulations of PFAS chemicals. The EPA has established drinking water standards for

[21] *Federal Acquisition Regulation: Disclosure of Greenhouse Gas Emissions and Climate-Related Financial Risk*, 87 Fed. Reg. 68312 (24 November 2022). RIN 9000-AO32; *available at* https://www.govinfo.gov/content/pkg/FR-2022-11-14/pdf/2022-24569.pdf.

PFAS[22] set at a level opposed by and unable to be measured by the nation's public drinking water utilities and that includes a new regulatory approach called a hazard index that has never before been used in setting drinking water standards.

Second, the Biden administration has listed PFOA and PFOS as hazardous substances under CERCLA,[23] or Superfund, serving to impose new legal liabilities instead of focusing on remediation of critical sites, and is reportedly developing new effluent limitation standards in manufacturing.

Third are onerous reporting requirements under TSCA Section 8(a)724. This rule requires companies and entities that manufacture (including import) or have manufactured (including imported) PFAS or PFAS-containing articles since January 1, 2011, to report information regarding PFAS uses, production volumes, disposal, exposures and hazards. This requirement will create a staggering volume of data that the EPA itself does not know how to manage or parse. This will only serve to impose significant costs on manufacturers of all sizes without addressing the remediation needs at sites of serious concern.

In each of these regulations, the EPA has failed to work with communities and stakeholders to develop workable and durable regulations for PFAS risk. Your administration has the opportunity to reverse course in this space to support U.S. manufacturing while protecting public health. We ask your administration to pause these PFAS rulemakings and listings, and instead take an incremental approach to PFAS that first addresses the higher risk non-polymer PFAS chemicals versus polymerized PFAS which are much lower risk chemicals.

Ethylene Oxide

An important use of ethylene oxide is the sterilization of medical equipment, including personal protective equipment used by health care professionals and hospitals, as well as textiles, semiconductors and batteries. It is estimated that ethylene oxide sterilizes 20 billion medical devices each year, helping to prevent disease and infection. However, the EPA's new regulations, the Sterilizers NESHAP[25] and the Hazardous Organics NESHAP,[26] use the EPA's flawed Integrated Risk Information System and have set compliance values that are below background levels of ethylene oxide and constitute an

---

[22] *PFAS National Primary Drinking Water Regulation*, 89 Fed. Reg. 32532 (26 April 2024). RIN 2040-AG18; *available at* https://www.govinfo.gov/content/pkg/FR-2024-04-26/pdf/2024-07773.pdf.

[23] *Designation of Perfluorooctanoic Acid (PFOA) and Perfluorooctanesulfonic Acid (PFOS) as CERCLA Hazardous Substances*, 89 Fed. Reg. 39124 (8 May 2024). RIN 2050-AH09; *available at* https://www.govinfo.gov/content/pkg/FR-2024-05-08/pdf/2024-08547.pdf.

[24] *Toxic Substances Control Act Reporting and Recordkeeping Requirements for Perfluoroalkyl and Polyfluoroalkyl Substances*, 88 Fed. Reg. 70516 (11 October 2023). RIN 2070-AK67; *available at* https://www.govinfo.gov/content/pkg/FR-2023-10-11/pdf/2023-22094.pdf.

[25] *National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review*, 89 FR 42932 (16 May 2024). RIN 2060-AV71; *available at* https://www.govinfo.gov/content/pkg/FR-2024-05-16/pdf/2024-07002.pdf.

[26] *New Source Performance Standards for the Synthetic Organic Chemical Manufacturing Industry and National Emission Standards for Hazardous Air Pollutants for the Synthetic Organic Chemical Manufacturing Industry and Group I & II Polymers and Resins Industry,* 89 Fed. Reg. 42932 (16 May 2024). RIN 2060-AV71; *available at* https://www.govinfo.gov/content/pkg/FR-2024-05-16/pdf/2024-07002.pdf.

extra-statutory action by the Agency, as it had no authority to conduct a second risk review.

The ability to manufacture ethylene oxide and its derivatives and use them for sterilization will be negatively impacted if the EPA does not reconsider and address its overly restrictive and technically unachievable regulations. Given the broad impact of the HON rule, we urge the EPA to make adjustments that will make this regulation technically achievable, workable and legal. We ask that your administration reevaluate the IRIS value itself given the Agency's repeated refusal to meaningfully respond to public comments, stay the two-year compliance timeline as projects will not be able to be completed in the currently mandated timeframe and pause implementation of this regulation.

TSCA Implementation

The Toxic Substances Control Act requires manufacturers to provide the EPA 90 days' notice of the intent to manufacture a new substance.[27] The statute requires notice to allow the EPA to decide on the new substance during the 90-day period. As of October 24, 2024, of the total 415 new chemicals under review, 393 have exceeded the 90-day review period, and 263 chemicals have been pending review for more than a year. This strains manufacturers across the country that are unable to commercialize products they have spent years and millions of dollars researching, developing and testing. This is a significant challenge for American manufacturing because new chemicals cannot be manufactured, imported or placed on the market without the EPA's determination. Manufacturers want to ensure they can develop new chemicals and innovate in the United States but need more certainty and predictability. As such, we encourage your EPA to develop the processes and protocols to ensure the Agency adheres to its statutorily required timelines to make determinations on bringing new substances to market. We also ask your administration to hold the EPA accountable for conducting science-based reviews within their 90-day deadline in order to help spur innovation and U.S. manufacturing.

Chemicals Risk Management

The Toxic Substances Control Act also requires the EPA to assess risk, which means to consider both the hazards of and the exposures to a chemical. However, the agency is not currently taking this approach to new regulations of existing chemicals in commerce. The EPA is focusing predominantly on hazards and making conservative assumptions about exposures, which is leading to unnecessary regulation. In its TSCA program and elsewhere, the EPA relies on assumptions and shortcuts instead of the thorough and transparent identification, assessment, weighing and integration of data that is needed to arrive at scientifically valid conclusions, which is leading to confusion, duplication and overregulation.

[27] 15 U.S. Code § 2604 - Manufacturing and processing notices, https://www.law.cornell.edu/uscode/text/15/2604.

One example of the mismanagement of the chemicals management process under TSCA is the current proposed risk evaluation for formaldehyde.[28] We urge your administration to pause and reconsider this evaluation, consider the full scientific record and learn from the mistakes the current administration has made in seeking to finalize it.

LABOR AND EMPLOYMENT REGULATIONS

Ask: Pause the Occupational Safety and Health Administration's rulemaking on heat standard[29] and reconsider OSHA's walkaround rule,[30] the Department of Labor's overtime rule[31] and the Federal Trade Commission's ban on non-compete agreements.[32]

OSHA's walkaround rule is a prime example of the Biden administration's regulatory overreach, infringing on employers' property rights, inviting new liabilities and introducing disruptive elements to safety inspections. At the same time, the DOL and FTC have sought to further dictate terms of employment, inserting the federal government more into decisions regarding overtime compensation and the protection of intellectual property. Additionally, the proposed new "heat rule" from OSHA would impose onerous new requirements on manufacturers while failing to recognize the widely varied needs and contexts of different manufacturing workplaces. Your administration should pause and reconsider the entirety of this currently proposed rule.

The U.S. will not maintain its mantle of economic leadership unless all labor stakeholders work together to ensure the best and most productive workplaces. Unfortunately, recent actions by agencies such as the DOL and the National Labor Relations Board threaten the employer-employee relationship and harm manufacturers' global competitiveness.

---

[28] *Formaldehyde; Draft Risk Evaluation Peer Review by the Science Advisory Committee on Chemicals (SACC); Notice of Availability, Public Meetings and Request for Comment*, 89 Fed. Reg. 18933 (15 March 2024). *Available at* https://www.govinfo.gov/content/pkg/FR-2024-03-15/pdf/2024-05554.pdf.

[29] *Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings*, 89 Fed. Reg. 70698 (30 August 2024). RIN 1218-AD39; *available at* https://www.govinfo.gov/content/pkg/FR-2024-08-30/pdf/2024-14824.pdf.

[30] *Worker Walkaround Representative Designation Process,* 89 Fed. Reg. 22558 (1 April 2024). RIN 1218-AD45; *available at* https://www.govinfo.gov/content/pkg/FR-2024-04-01/pdf/2024-06572.pdf.

[31] *Defining and Delimiting the Exemptions for Executive, Administrative, Professional, Outside Sales, and Computer Employees,* 89 Fed. Reg. 32842 (26 April 2024). RIN 1235-AA39; *available at* https://www.govinfo.gov/content/pkg/FR-2024-04-26/pdf/2024-08038.pdf.

[32] *Non-Compete Clause Rule*, 89 Fed. Reg. 38342 (7 May 2024). RIN 3084-AB74; *available at* https://www.govinfo.gov/content/pkg/FR-2024-05-07/pdf/2024-09171.pdf.

CORPORATE FINANCE REGULATIONS

Proxy Advisory Firms and the Proxy Process

Ask: Rescind SLB 14L and end the politicization of the proxy process. Additionally, enforce and preserve the 2020 proxy advisory firm rule while taking steps to build on its reforms with additional policies modeled on the SEC's 2019 proposal.

Under the Biden administration, the Securities and Exchange Commission issued Staff Legal Bulletin 14L,[33] which requires manufacturers to include activists' ESG policy proposals on their annual proxy ballots, irrespective of a proposal's relevance to their business or their shareholders' returns. By denying companies no-action relief to exclude politically motivated proposals, the SEC has turned the proxy ballot into a debate club, forcing businesses to court controversy and divert resources from growth and value creation. Manufacturers respectfully encourage your administration to immediately withdraw SLB 14L and return to the SEC's previous policy of reviewing proxy ballot proposals with Main Street investors' best interests in mind. We also encourage you not to finalize the Biden administration's proposed rule that would make it easier for activists to overwhelm the proxy ballot with duplicative, overly prescriptive proposals.[34]

Additionally, manufacturers urge your administration to provide robust oversight of so-called "proxy advisory firms"—underregulated third parties that exercise outsized control over public company governance. Manufacturers strongly supported the SEC's rule,[35] finalized during your first term, that instituted commonsense guardrails for these powerful actors, including requirements related to conflicts of interest and transparency. Unfortunately, the Biden administration refused to enforce this landmark rule and sought to rescind its most important provisions—decisions that were both found to be unlawful in federal court. Your administration can and should defend this rule and take steps to further rein in proxy firms' outsized influence.

ESG Disclosures

Ask: Revisit Biden administration rules mandating immaterial disclosures, require disclosure only of information that would be financially material to a reasonable investor and do not utilize federal securities law to achieve policymaking goals unrelated to investor protection and capital formation. In addition, avoid top-down, one-size-fits-all disclosure mandates.

Manufacturers are taking industry-leading steps to respond to the threats posed by climate change, ensure sustainable and environmentally friendly operations, enhance diversity and equity with their workforces, be responsive to their communities and more. Additionally, manufacturers are committed to providing appropriate disclosures about these important efforts, to the extent they are material to investors. Indeed, federal securities laws already require the disclosure of information necessary for investors to

---

[33] *Shareholder Proposals: Staff Legal Bulletin No. 14L*, SEC (3 November 2021). *Available at* https://www.sec.gov/rules-regulations/staff-guidance/staff-legal-bulletins/shareholder-proposals-staff-legal-bulletin-no-14l-cf.

[34] *Substantial Implementation, Duplication, and Resubmission of Shareholder Proposals Under Exchange Act Rule 14a-8*, 87 Fed. Reg. 45052 (27 July 2022). RIN 3235-AM91; *available at* https://www.govinfo.gov/content/pkg/FR-2022-07-27/pdf/2022-15348.pdf.

[35] *Exemptions From the Proxy Rules for Proxy Voting Advice*, 85 Fed. Reg. 55082 (3 September 2020). RIN 3235-AM50; *available at* https://www.govinfo.gov/content/pkg/FR-2020-09-03/pdf/2020-16337.pdf.

make an informed investing or proxy voting decision. Despite these existing requirements—and existing guidance for how companies can apply them to climate disclosures—the SEC has promulgated an entirely separate disclosure regime for public companies' climate-related information.

The SEC's final climate rule[36] is much less onerous than its original proposal, with unworkable requirements related to Scope 3 emissions and financial statement reporting omitted or significantly scaled back. Nevertheless, this novel and complex reporting regime will impose significant burdens on publicly traded manufacturers. Further, the rule raises significant questions with respect to the SEC's authority to issue a rule mandating climate disclosures—especially to the extent that the required information is not material to investors. Your administration has the opportunity to revisit the climate rule—as well as other Biden administration SEC mandates[37]—and ensure that public company disclosures remain focused on material information for investors.

Antitrust

Ask: Rescind the Biden administration's onerous pre-merger notification rule; limit barriers to pro-growth, pro-consumer M&A activity that enhances manufacturers' ability to grow and drive economic expansion in the U.S.

Business combinations are often crucial to manufacturing growth. Mergers and acquisitions have significant benefits for manufacturers of all sizes, as well as their customers. Pro-growth transactions in the manufacturing industry set the stage for business efficiencies, enhanced product offerings and reduced costs for consumers. Healthy M&A activity is also vital for capital formation throughout a company's life cycle, and particularly for small businesses.

Yet under the Biden administration, the Federal Trade Commission and the Antitrust Division of the Department of Justice took steps to stifle business combinations, including via new merger guidelines, enhanced filing requirements and onerous merger review. Most recently, the Biden administration finalized amendments to the rules[38] implementing the Hart-Scott-Rodino Antitrust Improvements Act that will make it significantly more time-consuming and costly for manufacturers to consummate pro-growth mergers. Your administration has the opportunity to support economic growth in manufacturing by immediately rescinding this damaging rule.

[36] *The Enhancement and Standardization of Climate-Related Disclosures for Investors*, 89 Fed. Reg. 21668 (28 March 2024). RIN 3235-AM87; *available at* https://www.govinfo.gov/content/pkg/FR-2024-03-28/pdf/2024-05137.pdf.

[37] *See, e.g., Cybersecurity Risk Management, Strategy, Governance, and Incident Disclosure*, 88 Fed. Reg. 51896 (4 August 2023). RIN 3235-AM89; *available at* https://www.govinfo.gov/content/pkg/FR-2023-08-04/pdf/2023-16194.pdf.

[38] *Premerger Notification; Reporting and Waiting Period Requirements*, 89 Fed. Reg. 89216 (12 November 2024). RIN 3084-AB46; *available at* https://www.govinfo.gov/content/pkg/FR-2024-11-12/pdf/2024-25024.pdf.

INTELLECTUAL PROPERTY REGULATIONS

"March-in" Rights
Ask: Withdraw the Biden administration's "march-in" guidance and protect manufacturers' intellectual property rights.

The Biden administration's "march-in" guidance[39] poses a significant threat to innovation and R&D in the United States. This guidance, issued by the National Institute of Standards and Technology, would allow federal agencies to seize manufacturers' intellectual property based solely on the price of the products incorporating that IP. It would apply to products whose development was supported at any point by federally funded research, threatening to destroy public-private partnerships that are vital to early-stage research and innovation.

This guidance is a clear violation of the statute under which it was issued: the Bayh-Dole Act was designed to support and encourage commercialization of federally funded IP, and price considerations are completely absent from the law's "march-in" criteria. Manufacturers encourage your administration to withdraw this guidance and to disclaim any attempts to undermine America's world-leading innovation economy by imposing price controls on innovative manufacturers.

Right-to-Repair
Ask: Safeguard companies' IP rights and protect consumers from the potentially dangerous safety and environmental risks that right-to-repair would create.

Despite manufacturers' extensive efforts to provide customers with the information, tools and resources they need to maintain and repair their own equipment, activists continue to pressure the federal government to impose so-called "right-to-repair" restrictions on manufacturers.

If adopted, right-to-repair rules would actually effectuate a right to *modify*, allowing for easy violations to safety controls and emissions limits—while also undermining manufacturers' intellectual property rights. Despite these clear risks, the Federal Trade Commission, the Department of Justice and the U.S. Copyright Office have in recent years come out in favor of unworkable right-to-repair restrictions. Your administration has the opportunity to change course by standing firm against activists' efforts to impose right-to-repair on manufacturers.

ADDITIONAL REGULATIONS

Cyber Incident Reporting
Ask: Narrow the scope of the Department of Homeland Security's proposal to implement cyber incident reporting legislation.

The Cyber Incident Reporting for Critical Infrastructure Act of 2022 created a statutory framework for critical infrastructure companies—including many manufacturers—to report significant cyber incidents to the Department of Homeland Security's

[39] *Request for Information Regarding the Draft Interagency Guidance Framework for Considering the Exercise of March-In Rights*, 88 Fed. Reg. 85593 (8 December 2023). *Available at* https://www.govinfo.gov/content/pkg/FR-2023-12-08/pdf/2023-26930.pdf.

Cybersecurity and Infrastructure Security Agency. Unfortunately, the Biden administration's proposed rule[40] implementing CIRCIA is both overreaching and unworkable; specifically, the proposed rule would apply to too many entities and require unnecessarily extensive and detailed reporting.

Consumer Product Safety Commission

Ask: Reverse the trend of the CPSC's overreliance on unworkable mandates; rather, utilize voluntary standards and enhanced industry engagement to ensure robust consumer protection.

The Consumer Product Safety Act directs the CPSC to utilize voluntary standards rather than top-down mandates if the agency can determine that there will be substantial compliance with the voluntary standard and that it will eliminate or adequately reduce consumers' risk of injury. Manufacturers are committed to working collaboratively with government and industry to develop these voluntary standards, and to strong compliance efforts when one is adopted. However, the CPSC in recent years has rushed to regulate, short-circuiting the voluntary standards process in contravention of the CPSA—often resulting in burdensome and infeasible regulations. Your administration has the opportunity to reverse course by allowing the private sector to develop and comply with voluntary standards rather than imposing unnecessary and unworkable government mandates. Additionally, under your administration, manufacturers look forward to enhanced feedback from and collaboration with our industry whenever the CPSC seeks to promulgate a new rule.

Food Traceability Recordkeeping Requirements

Ask: Simplify and streamline new requirements under the Food and Drug Administration's Food Traceability Final Rule and extend the compliance deadline by at least three years.

The FDA's Food Traceability Rule[41] establishes extensive recordkeeping requirements for companies involved in growing, processing, manufacturing, or selling foods on the FDA's Food Traceability List—impacting businesses throughout America's agriculture, food and beverage value chains. Without clear benefits for foodborne illness prevention, the rule subjects tens of thousands of products to complex tracking requirements across the entire supply chain. The FDA should make these requirements more flexible and streamlined, while also extending the 2026 compliance deadline by at least three years to give industry stakeholders time to develop and implement effective, low-cost tracking systems. Additionally, the FDA should collaborate with industry on pilot projects to identify challenges and develop practical solutions that improve food safety.

[40] *Cyber Incident Reporting for Critical Infrastructure Act (CIRCIA) Reporting Requirements*, 89 Fed. Reg. 23644 (4 April 2024). RIN 1670-AA04; *available at* https://www.govinfo.gov/content/pkg/FR-2024-04-04/pdf/2024-06526.pdf.

[41] *Requirements for Additional Traceability Records for Certain Foods*, 87 Fed. Reg. 70910 (21 November 2022). RIN 0910-AI44; *available at* https://www.govinfo.gov/content/pkg/FR-2022-11-21/pdf/2022-24417.pdf.

Registered Apprenticeship

Ask: Reconsider and rescind the Employment and Training Administration's proposed rule on registered apprenticeship.[42]

America's manufacturers face a perennial challenge of recruiting and retaining a talented workforce. Apprenticeship represents a proven method for both building pipelines of talent into the manufacturing workforce and enabling skill development toward a successful career. The ETA's proposed rule on registered apprenticeship would add significant new administrative requirements for apprenticeships, making it more difficult for employers and intermediaries to participate in these vital programs. Rather than this burdensome approach, your Administration should work with manufacturers to encourage the expansion and widespread adoption of apprenticeship in the United States.

Appliance Energy Efficiency Standards for Commercial Refrigeration Equipment

Ask: Pause the Biden administration's rulemaking under the Energy Policy and Conservation Act on commercial refrigeration equipment[43] *and/or issue a "no-new-standard" standard.*

While the DOE must evaluate proposed energy efficiency standards for several equipment categories, like CRE, every six years under the EPCA, the law does not mandate that the DOE impose such standards. Rather, the DOE is to impose new energy efficiency standards only if the DOE finds that such standards are "technologically feasible" and "economically justified."

The DOE has nonetheless elected to proceed with unprecedented standards that are technologically impossible to meet and economically unjustified. For example, the DOE's proposed standards require energy reductions of 17% to 60% on top of those put in place just three years ago. As the DOE's analysis acknowledges, the increased costs caused by these standards may take customers decades—up to 93.9 years—to recoup. Ironically, the DOE's proposed energy efficiency standards may in fact increase energy consumption because CRE customers may keep their old equipment operating as long as possible rather than incur the substantial cost to shift to new CRE product lines.

Manufacturers urge your administration to pause these unrealistic efficiency standards, which will drive up costs to the small businesses that use and purchase CRE, causing them to hold on to their outdated, less-efficient equipment, or seek cheap, non-compliant CRE from other counties. This is bad for America, bad for America's CRE manufacturers and bad for the scores of American small businesses that purchase and use CRE.

Consumer Products and 1,4-dioxane

In 2020, the EPA determined that consumer products containing 1,4-dioxane as a byproduct do not present an unreasonable risk of injury to human health or the environment. However, in November 2024, the EPA reversed course and has not provided the public with a more complete understanding of risk, while continuing to use

[42] *National Apprenticeship System Enhancements,* 89 Fed. Reg. 3118 (17 January 2024). RIN 1205-AC13; *available at* https://www.govinfo.gov/content/pkg/FR-2024-01-17/pdf/2023-27851.pdf.

[43] *Energy Conservation Program: Energy Conservation Standards for Commercial Refrigerators, Freezers, and Refrigerator-Freezers*, 89 Fed. Reg. 68788 (28 August 2024). RIN 1904-AD82; *available at* https://www.govinfo.gov/content/pkg/FR-2024-08-28/pdf/2024-19072.pdf.

an approach to the mode of action for carcinogenicity that remains out of step with other global regulatory authorities. We urge that the EPA be held accountable to using the best available science, complying with scientific standards under TSCA and adhering to its own information quality guidelines to address its scientific and legal obligations. Manufacturers appreciate the EPA's commitment to stakeholder engagement and implore your administration to thoroughly consider relevant new information and scientific data as it drafts its proposed risk management rulemaking.

* * * *

Mr. President, America's manufacturers are ready to move forward with you. With each step, we're committed to tracking our progress and celebrating our shared wins, creating an environment that truly supports manufacturing, innovation and American prosperity. Let's get to work and make America's manufacturing sector unstoppable.

We look forward to working with you over the coming years to achieve these important goals.

Sincerely,

Alaska Chamber
The Aluminum Association
The American Bakers Association
American Boiler Manufacturers Association (ABMA)
American Chemistry Council
American Cleaning Institute
American Coatings Association
American Coke and Coal Chemicals Institute
American Composites Manufacturers Association
American Forest & Paper Association
American Foundry Society
American Frozen Food Institute
American Home Furnishings Alliance
American Iron and Steel Institute
American Wood Council
AMT – The Association For Manufacturing Technology
Arizona Chamber of Commerce & Industry
Arkansas State Chamber / AIA
Associated Equipment Distributors
Associated Industries of Florida
Associated Industries of Missouri
Associated Industries of Vermont
Association of Equipment Manufacturers
Association of Home Appliance Manufacturers
Business & Industry Association of New Hampshire
The Business Council of New York State, Inc.
Can Manufacturers Institute
The Carpet and Rug Institute
CBIA
Chamber of Commerce Hawaii
Colorado Chamber of Commerce
Composite Panel Association

Council of Industrial Boiler Owners (CIBO)
ECIA – Electronic Components Industry Association
The Fertilizer Institute
FMI – The Food Industry Association
Georgia Association of Manufacturers
Greater North Dakota Chamber
The Hardwood Federation
Household & Commercial Products Association
Idaho Association of Commerce and Industry
INDA, Association of the Nonwoven Fabrics Industry
Independent Lubricant Manufacturers Association
Indiana Manufacturers Association
Industrial Fasteners Institute
Industrial Truck Association
International Sign Association
Iowa Association of Business and Industry
IPC – Build Electronics Better
Irrigation Association
Kansas Chamber of Commerce
Kansas Manufacturing Council
Kentucky Association of Manufacturers
Louisiana Association of Business and Industry
Manufacturing Technology Deployment Group
Maryland Chamber of Commerce
Metals Service Center Institute
Michigan Manufacturers Association
Minnesota Chamber of Commerce
Mississippi Manufacturers Association
Montana Chamber of Commerce
Motorcycle Industry Council
National Association of Manufacturers
National Lime Association
National Marine Manufacturers Association
National Mining Association
National Propane Gas Association
National Wooden Pallet & Container Association
NC Chamber
Nebraska Chamber of Commerce & Industry
Nevada Manufacturers Association
New Jersey Business and Industry Association
New Mexico Business Coalition
North American Association of Food Equipment Manufacturers (NAFEM)
North American Die Casting Association
Ohio Manufacturers' Association
Oregon Business & Industry
Outdoor Power Equipment Institute
Pennsylvania Manufacturers' Association
Petroleum Equipment Institute – PEI
Plumbing Manufacturers International
Polymeric Exterior Products Association
Pool and Hot Tub Alliance

Precast/Prestressed Concrete Institute
PRINTING United Alliance
Railway Supply Institute
Recreational Off-Highway Vehicle Association
Recycled Materials Association (ReMA)
Rhode Island Manufacturers Association
RV Industry Association
Society of Chemical Manufacturers and Affiliates (SOCMA)
South Carolina Chamber of Commerce
Specialty Vehicle Institute of America
State Chamber of Oklahoma
Steel Manufacturers Association
The Sulphur Institute
Tennessee Chamber of Commerce / Tennessee Manufacturers Association
Texas Association of Business
Textile Care Allied Trades Association
TRSA – The Linen, Uniform and Facility Services Association
Utah Manufacturers Association
Vinyl Institute
Virginia Manufacturers Association
West Virginia Manufacturers Association

CC: Scott Bessent, Secretary-Designate, Department of the Treasury
The Honorable Doug Burgum, Secretary-Designate, Department of the Interior
Howard Lutnick, Secretary-Designate, Department of Commerce
The Honorable Lori Chavez-DeRemer, Secretary-Designate, Department of Labor
The Honorable Sean Duffy, Secretary-Designate, Department of Transportation
Chris Wright, Secretary-Designate, Department of Energy
The Honorable Linda McMahon, Secretary-Designate, Department of Education
The Honorable Kristi Noem, Secretary-Designate, Department of Homeland Security
Susie Wiles, Chief of Staff-Designate
The Honorable Lee Zeldin, Administrator-Designate, Environmental Protection Agency
The Honorable Paul Atkins, Chair-Designate, Securities and Exchange Commission
Dr. Marty Makary, Commissioner-Designate, Food and Drug Administration
The Honorable Russell Vought, Director-Designate, Office of Management and Budget
The Honorable Kevin Hassett, Chair-Designate, National Economic Council
Stephen Miller, Deputy Chief of Staff for Policy-Designate
Vince Haley, Director-Designate, Domestic Policy Council
Elon Musk, Department of Government Efficiency
Vivek Ramaswamy, Department of Government Efficiency