August 14, 2013

President Barack Obama
President of the United States
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Dear Mr. President:

I am writing to commend your recent Executive Order on Improving Chemical Facility Safety and Security. Nothing is more important to the membership of the American Chemistry Council (ACC) than the safety and security of our facilities, our employees, and our communities. For this reason, I would like to express our strong interest in working with you, your staff, and the regulatory agencies to implement this Executive Order.

As the nation’s leading trade association for chemical manufacturers, ACC stands ready to offer the assistance of our member experts to engage with the Chemical Facility Safety and Security Working Group. We believe ACC has valuable best practices, model programs, and broad experience that would assist the Working Group with its important task to enhance safety and security.

ACC and our members are proud to be part of an industry group that has placed safety and security at the core of its operations—our companies have reduced injury and illness rates at their facilities by 79 percent since 1990; our injury rate is five times lower than the U.S. manufacturing sector as a whole; and we have reduced the number of incidents that resulted in a product spill, fire, explosion, or injury by 58 percent since 1995. One important contributing factor to this strong safety record is that our membership is required to implement the ACC Responsible Care® program, the chemical industry’s leading environmental, health, safety, and security performance initiative. This obligation extends to all ACC member and Partner companies, including chemical transporters, distributors, warehouses, logistics planners, and others along the supply chain.

Under Responsible Care, our members are also required to work with communities and first responders to prepare for potential accidents. In addition to Responsible Care, ACC’s CHEMTREC® provides 24/7 emergency response assistance, and ACC also sponsors TRANSCAER®, a voluntary national outreach effort focusing on assisting communities and emergency personnel to prepare and respond to possible hazardous transportation incidents. Together, these programs represent a comprehensive ongoing effort to be responsible neighbors and employers.
The Executive Order wisely directs the Working Group to come up with options to take advantage of private sector initiatives to help improve how the federal government manages safety and security. We agree that increased recognition and leveraging of industry performance improvement programs, such as the ACC’s Responsible Care program, should be an essential component of updating existing federal programs.

The process established in the Executive Order also presents the Administration, regulatory agencies, stakeholders, and industry an opportunity to identify ways to better engage, educate, and inform all of those who have a role in enhancing chemical safety and security. Furthermore, we believe this provides an opening to improve how various agencies and programs operate and ensure they complement each other and work in partnership with the regulated community.

ACC and its members commend the Administration for taking leadership on this important issue, and we are committed to working with you to ensure that America continues to benefit from a safe, secure, strong, and growing chemical industry.

Respectfully,

Cal Dooley

cc: The Honorable Gina McCarthy
Administrator
The U.S. Environmental Protection Agency

The Honorable Janet Napolitano
Secretary
The U.S. Department of Homeland Security

The Honorable Thomas E. Perez
Secretary
The U.S. Department of Labor