

October 16, 2025

The Honorable Donald J. Trump
President of the United States
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Dear Mr. President,

As chief executives of American Chemistry Council (ACC) member companies, we write to express our strong concerns regarding the proposed merger between the Union Pacific (UP) and Norfolk Southern (NS) railroads. Fewer railroads mean fewer transportation options, and past rail mergers make it clear that this merger threatens to make our U.S. manufacturing sites less competitive with the rest of the world. We support a thorough review by the Surface Transportation Board (STB) in order to protect American producers and consumers—not just railroads.

The chemical industry is a powerhouse of the U.S. manufacturing economy—supporting over 550,000 good-paying jobs, generating \$633 billion annually, and providing the building blocks for more than one-quarter of America's GDP. Our industry provides vital chemistries for strengthening national defense, increasing energy development, manufacturing computer chips and automobiles, rebuilding the country's infrastructure, and supporting healthcare and biotechnology. We are a world leader with \$164 billion in annual exports of chemical products.

For the chemical industry, transportation isn't just a logistical concern—it's our lifeline. Our U.S. production facilities depend on all modes of transportation both to bring in raw materials and deliver finished products to virtually every part of the economy. Last year alone, more than one billion tons of chemical materials moved across the country to help create the products and solutions our nation depends on every day.

We strongly support your leadership to reestablish America as a manufacturing superpower and a leader in global trade. To secure success, our country must improve the way we transport American-made goods, including products of the chemical industry.

Today, the U.S. freight rail system is less competitive than ever. Just four railroads control more than 90% of U.S. rail traffic and most U.S. chemical production facilities are served by only one major railroad. Past mergers have led to severe service disruptions, rising rates, weakened supply chains and a less competitive U.S. industrial base. We have no doubt that combining UP and NS into the nation's largest railroad will make these problems worse, leaving domestic manufacturers, farmers, and energy producers with fewer

choices, higher costs, and less reliable service. And, if approved, this deal will likely spur additional mergers culminating in a nationwide railroad duopoly.

The STB has the exclusive authority to review rail mergers and will determine whether the UP/NS proposal is “consistent with the public interest.” The Board must be allowed to do its job and hold firm to a broad view of its mandate and set a high bar for merger approvals. The STB should reject any deal that fails to clearly demonstrate how it would effectively improve service, increase safety, and enhance rail-to-rail competition.

You have committed to restoring American manufacturing, strengthening domestic supply chains, and outcompeting global rivals and we, the undersigned, fully support those goals. To achieve them, we require a rail system that delivers for U.S. manufacturers and consumers. That means we need more rail-to-rail competition, not less. We respectfully urge you to continue challenging anticompetitive regulations and support a strong STB that can help build a rail network that supports the needs of American manufacturers and consumers.

Sincerely,

Dean Cordle
President & Chief Executive Officer
A C & S, Incorporated

Sean Keohane
President and Chief Executive Officer
Cabot Corporation

John Froehlich
Chief Technology Officer
Albaugh, LLC

Scott Richardson
President and Chief Executive Officer
Celanese Corporation

Venki Chandrashekar
President and Chief Executive Officer
Americas Styrenics LLC

Denise Dignam
Chief Executive Officer
Chemours

Anthony O'Donovan
President and Chief Executive Officer
Arkema, Inc.

Michelangelo Cavallo
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COIM USA Inc.

Phil McDivitt
President and Chief Executive Officer
Ascend Performance Materials, LLC

Jason Painter
President
Covora Mining Solutions, LLC

Marc Nolen
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Kurt Bitting
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Ecovyst Inc.

Pavel Perlov
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Guido Skudlarek
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Randy Owens
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Foremark Performance Chemicals, Inc.

Michael Lefenfeld
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Hexion, Inc.

Peter Huntsman
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