

American Alliance for Innovation



September 18, 2026

The Honorable Doug Troutman
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency

Re: Principles of TSCA Risk Management

Dear Assistant Administrator Troutman:

We are writing on behalf of the American Alliance for Innovation (AAI) to provide the attached *Principles of TSCA Risk Management* and to ask EPA to consider these guiding principles as it develops future risk management regulations under Section 6 of the Toxic Substances Control Act (TSCA).

AAI is a coalition of trade associations representing manufacturers, innovators, and downstream users across the U.S. economy that rely on chemicals and chemical-based products to support advanced manufacturing, infrastructure, energy, healthcare, and other essential sectors. AAI members support risk management regulations that address, to the extent necessary, identified unreasonable risks and are consistent with all applicable TSCA requirements.

These principles were developed to help guide our organizations' comments and engagement on TSCA risk management rulemakings with a common set of principles for evaluating and developing TSCA risk management measures. They are intended to promote risk management approaches that are transparent, predictable, science-based, and appropriately tailored to address identified unreasonable risks while supporting innovation, economic competitiveness, supply chain resilience, regulatory certainty, and the avoidance of duplicative, overlapping, or conflicting regulatory requirements.

The principles are organized around five core concepts:

- **Apply a Transparent, Consistent Framework**
- **Regulate Only "To the Extent Necessary"**
- **Drive Decisions with Weight of Evidence and Best Available Science**
- **Develop Targeted, Flexible, and Tailored Measures**
- **Avoid Regulatory Overlap and Achieve Balanced Outcomes**

We respectfully encourage EPA to consider these principles as it develops future risk management regulations. EPA can use these principles to help establish a transparent and

consistent framework for TSCA risk management across rulemakings, improving the efficiency and predictability of regulatory decision-making while supporting more effective and durable regulatory outcomes. AAI's members stand ready to engage constructively with the Agency on these important issues.

Thank you for your consideration.

Sincerely,

Acrylonitrile Group
Adhesive and Sealant Council
Alabama Chemistry Council
Alkylphenols & Ethoxylates Research Council
Alliance for Automotive Innovation
Alliance for Chemical Distribution (ACD)
American Association of Veterinary Laboratory Diagnosticians (AAVLD)
American Chemical Society
American Chemistry Council
American Cleaning Institute
American Coatings Association
American Coke and Coal Chemicals Institute
American Composites Manufacturers Association
American Feed Industry Association
American Foundry Society
American Fuel and Petrochemical Manufacturers
American Home Furnishings Alliance (AHFA)
American Petroleum Institute
American Wood Council
AmericanHort
AMT - The Association For Manufacturing Technology
Asphalt Roofing Manufacturers Association (ARMA)
Auto Care Association
Baby Safety Alliance
Battery Council International
Chemical Industry Council of Illinois
Chemical Users Coalition
Chemistry Council of NJ
Coated Fabrics and Film Association
Color Pigments Manufacturers Association
Communications Cable & Connectivity Association (CCCA)
Composite Panel Association
ECIA - Electronic Components Industry Association
Essential Minerals Association
Extruded Polystyrene Foam Association (XPSA)
Flexible Packaging Association (FPA)
Georgia Chemistry Council
Global Electronics Association

Independent Lubricant Manufacturers Association (ILMA)
Institute of Makers of Explosives
International Cadmium Association
International Sleep Products Association (ISPA)
International Wood Products Association
International Zinc Association
Kentucky Association of Manufacturers
Massachusetts Chemistry & Technology Alliance (MCTA)
MEMA, The Vehicle Suppliers Association
Metal Construction Association
MI - The Global Methanol Alliance
Michigan Chemistry Council
National Aquaculture Association
National Association of Manufacturers
National Council of Textile Organizations (NCTO)
National Marine Manufacturers Association
National Mining Association
National Shooting Sports Foundation
National Stone, Sand & Gravel Association
National Tooling and Machining Association
NC Chamber
National Electrical Manufacturers Association (NEMA)
Non-Ferrous Founders' Society
North American Association of Food Equipment Manufacturers (NAFEM)
North American Die Casting Association
North American Metals Council
Off-Road Business Association (ORBA)
Ohio Chemistry Technology Council
Ohio Manufacturers' Association
Outdoor Power Equipment Institute
Pennsylvania Chemical Industry Council
Pennsylvania Manufacturers' Association
Performance Racing Industry (PRI)
PET Resin Association (PETRA)
Pine Chemicals Association International
Plastic Pipe and Fittings Association
PLASTICS Industry Association
Plumbing Manufacturers International
Polyisocyanurate Insulation Manufacturers Association
Polyurethane Foam Association (PFA)
Power Tool Institute
Precision Machined Products Association
Precision Metalforming Association
Print Creative Alliance
PRINTING United Alliance
Resilient Floor Covering Institute (RFCI)
Society of Chemical Manufacturers & Affiliates (SOCMA)

South Carolina Manufacturers and Commerce
Specialty Equipment Market Association
Spray Foam Coalition
Spray Polyurethane Foam Alliance
SPRI
Steel Founders' Society of America
Texas Association of Manufacturers
The Fertilizer Institute
The International Cast Polymer Association
Treated Wood Council
U.S. Chamber of Commerce
U.S. Tire Manufacturers Association
Utility Solid Waste Activities Group
Vinyl Institute
Virginia Chemistry Council
WV Manufacturers Association