One Framework. 100+ Voices.

The American Alliance for Innovation's TSCA Risk Management Principles are supported by over 100 organizations representing manufacturers, innovators, suppliers, and downstream users across the American economy. Together, they support risk management approaches that address identified risks while preserving innovation, competitiveness, supply chain resilience, and regulatory certainty.

- 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

American Alliance for Innovation

American Alliance for Innovation

Principles for

Effective TSCA Risk Management

Science-Based, Transparent, and Durable Regulatory Outcomes

The American Alliance for Innovation (AAI), representing manufacturers, innovators, and downstream users across the U.S. economy, has developed a set of principles to help guide EPA's implementation of TSCA risk management requirements. These principles support transparent, predictable, and science-based regulations while promoting innovation, economic competitiveness, supply chain resilience, and regulatory certainty.

Supported By Over
100
ORGANIZATIONS
representing key sectors of the American economy

American Alliance for Innovation

PRINCIPLES OF TOXIC SUBSTANCE CONTROL ACT (TSCA) RISK MANAGEMENT

Organizations representing a broad spectrum of the U.S. economy, including manufacturers, innovators, and downstream users, have developed a set of principles to guide risk management.

For more information, contact
AAI@americanchemistry.com

Apply a Transparent, Consistent Framework

EPA should develop and apply a clear, consistent framework reflecting these principles, creating predictable outcomes, avoiding duplication or conflict with other federal programs, and ensuring meaningful stakeholder engagement.

- Establish and consistently apply a uniform framework with clear definitions, requirements, procedures, stakeholder engagement and documentation of key regulatory decisions.
- Coordinate with Federal agencies and document engagement.
- Design and implement an ongoing outreach strategy that includes stakeholder input on risk management activity that reaches all upstream and downstream supply chain stakeholders.
- Establish clear criteria and processes, including for evaluating and granting critical use exemptions when appropriate.
- Provide clear procedures for development of regulatory timeframes including extensions, effective dates, compliance dates, and sell-through provisions.
- Establish a standard process for gathering information to inform risk management decisions, including alternatives and economic analyses.
- Provide transparency by documenting in the regulatory record key assumptions, uncertainties, and decision criteria underlying risk management measures.

Regulate Only "To the Extent Necessary"

Restrictions can only be applied to the extent necessary so that the risk is no longer unreasonable.

- Apply requirements only to conditions of use (COU) that present unreasonable risk and activities and tasks within the COU that contribute to unreasonable risk.
- Ensure that the stringency of risk management requirements is proportionate to the nature, severity, and extent of the unreasonable risk identified.
- Evaluate the full range of risk management alternatives, including less burdensome alternatives; clearly document the rationale for including and excluding options.
- Apply a tiered approach, escalating incrementally and reserving broader restrictions only as a final measure.
- Document, consistent with TSCA Section 6(a) and Section 6(c) requirements, the effects and benefits of the chemical and economic consequences of the rule.

Drive Decisions with Weight of Evidence and Best Available Science

Risk management decisions and supporting analyses must use best available science and the weight of evidence.

- Use applicable Federal guidance and apply information, procedures, measures, methods, protocols, methodologies, and models consistent with the best available science when conducting economics and benefit analyses and making regulatory decisions.
- Account for confidence levels and limitations in underlying risk evaluation in establishing risk management requirements; uncertainty should not default to the most stringent restrictions.
- Apply a clear and robust approach to identify technically and economically feasible alternatives, when necessary, accounting for essential uses and supply chain impacts.
- Rely on reasonably available information and document assumptions, methods, variability, uncertainty, and any material limitations in the underlying evidence base.
- Apply these principles in accordance with TSCA Section 26(h) (best available science) and Section 26(i) (weight of the scientific evidence).
- Consider relevant new scientific information during risk management.

Develop Targeted, Flexible, and Tailored Measures

Risk management should be specific to the condition of use and underlying activities and tasks, including appropriate exemptions, critical-use allowances, phased implementation, and de minimis, byproduct and trace quantity thresholds.

- Target requirements to the populations and activities that contribute to unreasonable risk, including the use of geographically focused measures where appropriate.
- Provide flexibility to account for intermittent or limited uses.
- Establish approach for de minimis levels, trace quantities, by-products, and regulation of articles and replacement parts.
- Ensure that risk management actions do not result in risk-to-risk tradeoffs, including the transfer, substitution, or creation of new risks, and do not increase risk within the system(s) in which the chemical is used.

Avoid Regulatory Overlap and Achieve Balanced Outcomes

Risk management must be practical and balanced, fully considering economic consequences, including cost-effectiveness, cost-benefit, employment, technological innovation, feasibility, and supply chain continuity – including preservation of essential COUs - while avoiding overlapping or conflicting regulatory requirements.

- Avoid overlapping and conflicting regulatory requirements by deferring to the expertise and authorities of other Federal agencies pursuant to TSCA Section 9.
- Develop, document and consider full statement of effects on costs, benefits and effectiveness and meaningful regulatory alternatives.
- Evaluate on a continuing basis the potential effects of the rule's requirements on employment.
- When necessary, complete an analysis of reasonably available chemical substance alternatives.
- Fully implement the retrospective review requirements in TSCA Sections 24 and 26 and Section 610 of the Small Business Regulatory Enforcement Fairness Act.
- Consult and coordinate routinely with Federal agencies to develop management approaches that build on existing regulatory programs and avoid duplicative requirements.