



CREATING GOOD JOBS, A CLEAN ENVIRONMENT, AND A FAIR AND THRIVING ECONOMY

October 21, 2025

[Docket No. OSHA-2025-0041](#)

BlueGreen Alliance Response to OSHA's Proposed Rule on the General Duty Clause: *Limitation for Inherently Risky Professional Activities*

BlueGreen Alliance (BGA) unifies labor unions and environmental organizations into a powerful force working for an economy that fights climate change, protects the health of people and the environment, stands against economic and racial inequality, and creates and maintains good-paying, union jobs in communities across the country. The Occupational Safety and Health Administration (OSHA)'s proposed rule to limit the scope of the general duty clause is a direct attack on the lives and livelihoods of workers across the United States.

The general duty clause from the 1970 OSH Act requires that employers provide a workplace free from recognized hazards that are likely to cause serious injury or death. In the absence of a specific OSHA rule, which takes on average seven years from introduction to implementation, the general duty clause has historically functioned as a safety net for protecting workers when no specific OSHA standard exists for a particular hazard. While this proposed rule has put forth a non-exhaustive list of industries that would be affected by this rule, there is no guarantee that this rule will not lead to additional industries being excluded from the general duty clause and even more workers losing the legal protections it offers. Because of the relatively small number of rules promulgated by OSHA, as compared to the universe of workplace hazards, for many workers, the general duty clause is the only legal protection.

OSHA's mission, as stated on [osha.gov](https://www.osha.gov), is to "assure America's workers have safe and healthful working conditions free from unlawful retaliation." The proposed rule does not align with OSHA's mission nor its Congressional mandate to protect workers from known hazards likely to cause death or serious injury. In short, **we strongly oppose the proposed limitation to the General Duty Clause** that will only serve to put more workers in harm's way.