



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

The Honorable Brett Guthrie  
Chairman  
Committee on Energy and Commerce  
U.S. House of Representatives  
Washington, DC 20515

The Honorable Frank Pallone  
Ranking Member  
Committee on Energy and Commerce  
U.S. House of Representatives  
Washington, DC 20515

January 22, 2026

Dear Chair Guthrie and Ranking Member Pallone:

BGA unifies labor unions and environmental organizations into a powerful force to fight climate change, protect the health of people and the environment, stand against economic and racial inequality, and create and maintain good-paying, union jobs in communities across the country. We write today in opposition to the draft legislation being considered in today's hearing that would modify the Toxic Substances Control Act (TSCA).

A bipartisan Congress passed the 1976 Toxics Substances Control Act (TSCA) and strengthened its provisions in 2016 to review that "large body of science" and address the human health impacts of phthalates and other hazardous chemicals. The 2016 Frank R. Lautenberg Chemical Safety for the 21st Century Act (LCSA) allowed the EPA to initiate a long overdue effort to review the scientific evidence and restrict the chemicals that were doing the most harm to the health of the American people.

LCSA included workers in its definition of a "potentially exposed or susceptible subpopulation" that should be protected by new restrictions. The proposed legislation would forbid the EPA from providing that protection by amending Section 9(a) of the Toxic Substances Control Act (15 U.S.C. 2608(c):

(7) PROHIBITION.—The Administrator may not apply a requirement with respect to a chemical substance under section 6(a) that is inconsistent with another requirement applied with respect to the chemical substance under any Federal law not administered by the Administrator."

[On its website](#), OSHA warns that almost all of the agency's restrictions on chemicals are more than 50 years old and are "outdated and inadequate." How can requiring the use of 50-year-old limits be considered "modernization?"

We urge you to withdraw this proposed legislation that will weaken EPA's authority to restrict dangerous chemicals, fast-track new substances without full safety reviews, roll back protections established in the bipartisan 2016 reforms, and effectively prioritize chemical industry interests over the health of workers and communities.