



AIHA Top Public Policy Occupational and Environmental Health and Safety Issues

Biennial public policy survey indicates issues that present concerns for the industrial hygiene profession in 2009-2010

The American Industrial Hygiene Association (AIHA), as a result of its biennial membership survey, projects the top public policy issues of concern to AIHA members and the occupational and environmental health and safety (OEHS) profession over the next two years.

The 2009-2010 survey was divided into various categories. While providing results for the highest ranking issues in each category, AIHA has also identified the overall top public policy issues for the association in 2009-2010.

The survey was conducted on-line in October, 2008. More than 12% of the AIHA membership took part in the survey and more than 9% completed the entire survey.

AIHA will review existing white papers and position statements, as well as draft new position statements, to determine the appropriate response to each of the issues.

Overall Top Issues for 2009-2010

- Permissible Exposure Limits (PELs) Updating

The Occupational Safety and Health Administration (OSHA) PELs are consensus-based limits that indicate how long an individual can be exposed to a particular substance without experiencing harmful effects. The occupational health and safety profession considers PELs to be one of the most basic tools needed to protect workers. However, many PELs have not been updated since the 1960s and 1970s. Science in this area has matured, but the PELs have not. AIHA continues to work with OSHA, Congress and others to reach a consensus on the best way to update the PELs.

- Material Safety Data Sheets (MSDS) / Globally Harmonized System (GHS)

AIHA supports efforts to improve the accuracy of MSDS and supports efforts to improve hazard communication for employers and employees. Such efforts are also a crucial element in protecting workers and others in case of national emergencies. A major part of improving hazard communication is adoption of the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). AIHA supports adoption of the GHS.

- Nanotechnology

The increased use of nanotechnology in our daily lives raises concerns that we may be unaware of the occupational health and safety concerns when working with this new technology. AIHA



supports increased research into the possible hazards involved with nanotechnology, but suggests caution in enacting new legislation and/or regulations that might be detrimental to the health and safety of workers.

- Professional Recognition/Title Protection

This issue continues to appear in the top public policy issues for AIHA, as it has since 1993. Professional recognition/title protection allows industrial hygienists and others who have met minimum educational and experience requirements (such as certified industrial hygienists and certified safety professionals) to be legally defined and recognized as competent to perform certain work without the need for additional requirements. Some form of professional recognition/title protection legislation has been enacted in 19 states and more than 25 states have additional recognition of AIHA programs and/or definitions. AIHA continues to educate federal and state policymakers about the importance of recognizing those professionals who have received education and certification from nationally recognized and accredited organizations.

- Laboratory Accreditation

Accredited laboratories are the best way to ensure that test samples of potential workplace hazards are analyzed correctly. AIHA continues working to see that the AIHA laboratory accreditation program is noted in federal and state legislation and regulation as one of the programs with national recognition and acceptance. There is also an increased need to have AIHA accredited laboratories recognized on the international level.

Individual Categories

OSHA - Specific Issues

AIHA top public policy issues for the Occupational Safety and Health Administration (OSHA) addressing specific issues:

- Combustible Dust Standard
- Ergonomics Standard
- Cranes and Derricks Standard
- Silica Standard
- Indoor Air Quality

OSHA - General Issues

AIHA top public policy issues for the Occupational Safety and Health Administration (OSHA) addressing general issues:

- Permissible Exposure Limits (PELs) - Updating
- Globally Harmonized System (GHS) for Classification/Labeling of Chemicals
- Nanotechnology
- Safety and Health Programs / Injury and Illness Prevention Programs
- Risk Assessment



Federal/State Legislative Issues

AIHA top public policy issues for the Federal and/or State Legislative Activity:

- Permissible Exposure Limits (PELs) - Updating
- Appropriations for OSHA, MSHA, NIOSH, EPA
- Federal Contracting – Must comply with OSHA regs to receive
- Globally Harmonized System (GHS) for Classification/Labeling of Chemicals
- Expansion of OSHA coverage to all employees

Environmental Protection Agency Issues

AIHA top public policy issues for the Environmental Protection Agency (EPA):

- Globally Harmonized System (GHS) for Classification/Labeling of Chemicals
- Clean Air Act
- Clean Water Act

National/International Standards

Top national/international standards of importance to the profession:

- Nanotechnology
- Establishing Guideline Values / Setting PELs
- Laboratory Analysis/Certification
- Environmental/OH&S Management Systems

Additional standards ranking very high in the survey:

- Respiratory Protection
- Industrial Ventilation Systems
- Risk Management
- Noise / Bioacoustics

Association Issues

In addition to public policy issues, AIHA members also ranked the top issues of overall importance to AIHA. The top association issues are:

- Collaboration with other OEHS organizations
- Professional Ethics
- Standards (ANSI, ASTM, etc.)
- Globally Harmonized System (GHS) for Classification/Labeling of Chemicals



November 24, 2008

Ms. Emily Spieler
Obama Transition Team
c/o Occupational Safety and Health Administration
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Dear Ms. Spieler:

The American Industrial Hygiene Association (AIHA) would like to take this opportunity to congratulate President-elect Barack Obama on his election as the 44th President of the United States. We look forward to working with the new Administration in addressing the many occupational health and safety issues that impact workers every day.

As you move forward with the selection process for the Assistant Secretary of Labor for OSHA, AIHA would like to offer a few of the qualifications we feel the individual should possess when addressing the complex health and safety problems facing today's workers.

It is our feeling the individual chosen to lead OSHA should meet, at a minimum:

- A lifelong commitment to occupational health and safety
- Comprehensive training in occupational health and safety
- At least 15 years of technical experience in occupational health and safety
- Proven management experience
- The vision and ability to build coalitions and consensus among diverse groups to effectively promote occupational health and safety

We recognize that many factors will come into play in the final selection of the successful nominee. However, as the workplace continues to change and become more diversified, as well as the continuing global expansion of workplace health and safety, AIHA believes the Assistant Secretary of Labor for OSHA could be one of the most important appointments of the new administration. The worker health and safety agenda is a long one and the new Assistant Secretary must be an individual able to carry out one of the major themes of the Obama-Biden campaign, that being an ability to bring diverse viewpoints together.

AIHA believes there are numerous individuals who meet the qualifications to serve as Assistant Secretary and hope you carefully consider the qualifications before making an appointment. AIHA would be more than pleased to answer any questions you might have about possible nominees. Several previous Assistant Secretaries have been AIHA members.



On another note, you might be interested in the most recent public policy issue survey of AIHA members. This survey highlights the top issues our members believe should be undertaken at OSHA in the Obama Administration. The top general issues are:

- Updating the Permissible Exposure Limits (PELs)
- Adopting the Globally Harmonized System (GHS)
- Nanotechnology

As for specific issues at OSHA, our members believe these are the top issues:

- Combustible Dust Standard
- Ergonomics
- Safety and Health Programs

Thank you for your time and consideration. As the premier association of occupational and environmental health and safety professionals, representing more than 10,000 members from a cross-section of industry, private business, labor, academia, and government, AIHA looks forward to working with the new Administration to see that every worker goes home healthy and safe.

If AIHA or I can be of any assistance to you in your deliberations, please do not hesitate to contact me.

Sincerely,

Lindsay E. Booher, CIH, CSP
AIHA President

cc: AIHA Board of Directors
Peter O'Neil, Executive Director
Aaron Trippler, Director Government Affairs