



July 27, 2021

The Honorable Tom Carper
Chairman, Committee on
Environment and Public Works
United States Senate
Washington, DC 20510

The Honorable Shelley Moore Capito
Ranking Member, Committee on
Environment and Public Works
United States Senate
Washington, DC 20510

Dear Chairman Carper and Ranking Member Capito:

The American Chemistry Council (ACC), the primary trade association representing the business of chemistry, strongly supports filling all of the seats on the Chemical Safety and Hazard Investigation Board (CSB). However, ACC is concerned that the nominees under consideration for the CSB do not have the necessary experience or expertise to meet its mission. Over the past several years the CSB has struggled to meet its mandate, which is why it is so important to have experts focused on process safety serving on the Board.

The CSB is tasked with the critical role of investigating industrial chemical accidents, conducting root cause analyses, and making safety recommendations. A key skill set necessary for CSB members is considerable knowledge of the chemical manufacturing environment, including direct process safety experience to understand plant systems, equipment and procedures. During a January 2020 hearing before your committee, I testified to the important need for Board members to have applicable experience in the operations and processes of chemical facilities and encouraged the appointment of well-qualified industry and process safety experts to fill out the Board.

The three nominees currently pending before the Committee, while accomplished in their own respective fields, lack the critical and necessary background to meet the mission of the CSB. We urge the Committee to reconsider these nominations and recommend the Administration seek appropriately qualified candidates who possess the process safety experience needed to fulfill the CSB's mandate. ACC values the important work of the CSB and is committed to working with this Committee and the CSB to protect workers, the public, and the environment.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. Jahn", with a long horizontal flourish extending to the right.

Chris Jahn
President and CEO

