

January 30, 2026

Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington, DC
20515-6115

RE: January 22, 2026, House Subcommittee Hearing on Legislation to Modernize TSCA – Post Hearing Comments from the National Marine Manufacturers Association (NMMA)

Dear Members of the Subcommittee on Environment,

The National Marine Manufacturers Association (NMMA) appreciates the opportunity to provide comments in support of the Discussion Draft of Legislation to Modernize the Toxic Substances Control Act.

NMMA supports changes to the TSCA process that continues to protect health and the environment, while also considering the unique processes, applications, uses, and existing safety controls across different industries that use chemicals evaluated under TSCA.

The NMMA is the leading recreational marine trade association in North America, representing more than 1,300 manufacturers of boats, engines, trailers, and marine accessories. Recreational boat building is a uniquely American industry with 95 % of boats sold in the U.S. made in the U.S. The recreational boating industry has a \$230 billion impact on our nation's economy, supporting more than 812,000 jobs and 36,000 businesses across the country. Collectively, recreational boating and fishing are top contributors to the U.S. outdoor recreation economy, which accounts for \$1.2 trillion in economic impact, 2.3 % of GDP, and 5 million American jobs.

Recreational boaters and maritime businesses rely on clean water, healthy ecosystems, and self-regulation. Environmental conservation is a staple of recreational boating and fishing – activities that are enjoyed by millions of Americans each year. Furthermore, NMMA and its members take the safety and well-being of our collective American recreational boat building workforce seriously and value the long-term working relationships with EPA to further reduce emissions and improve environmental performance.

The proposed Discussion Draft, dated January 14, 2026, validates the recommendations of EPA's proposed TSCA Framework Rule 40 CFR Part 702 [EPA-HQ-OPPT-2025-0260; FRL-8529.1-01-OCSPP] which NMMA also supports. Additionally, NMMA supports this legislative proposal to address unintended shortcomings of the bipartisan Frank R. Lautenberg Chemical Safety for the 21st Century Act by providing overall enhanced regulatory direction to EPA that incorporates appropriate guardrails to ensure confidence in Section 6 rulemaking authority and specifically acknowledges that insignificant chemical exposures that pose no risk to downstream users and manufacturers do not need to be overregulated by EPA. A successful manufacturing economy in the United States only grows stronger and more competitive with this level of clarity and intent offered by this legislative proposal.



It is very important under the proposed TSCA framework to evaluate potential risks associated with a chemical's conditions of use rather than drawing broad conclusions on the chemical in its entirety. Manufacturing processes across multiple industries vary significantly and are often already regulated by multiple agencies and implementing regulations including EPA, Occupational Safety and Health Administration (OSHA) Permissible Exposure Limits (PEL), Resource Conservation and Recovery Act (RCRA), National Emission Standards for Hazardous Air Pollutants (NESHAP), Maximum Achievable Control Technology (MACT) standards, state standards, industry standards, and best practices. A history of demonstrating safe and effective process controls, use of personal protective equipment, engineering controls, industry standards, and data specific to the unique use of a chemical within a specific industry is critical to ensuring that risk evaluations under TSCA are grounded in reality. **In sum, EPA should only regulate a chemical use where a reasonable risk is scientifically supported. NMMA agrees with the discussion draft's language on this critical point.**

NMMA appreciates the opportunity to provide comments and looks forward to working with committee staff on next steps.

Respectfully,



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