July 13, 2017

Mr. Thomas Galassi  
Acting Deputy Assistant Secretary  
Occupational Safety and Health Administration  
U.S. Department of Labor  
200 Constitution Avenue, N.W.  
Washington, D.C. 20210

VIA ELECTRONIC SUBMISSION: http://www.regulations.gov

Re: Comments on OSHA Docket No. OSHA-2013-0023, Improve Tracking of Workplace Injuries and Illnesses: Proposed Delay of Compliance Date

Dear Mr. Galassi:

Thank you for the opportunity to submit these comments on behalf of the National Tooling and Machining Association (NTMA) and Precision Metalforming Association (PMA) regarding the proposed delay of compliance under the rule entitled “Improve Tracking of Workplace Injuries and Illnesses.” Combined, our associations represent nearly 2,500 businesses manufacturing components, tooling, and dies for the automotive, aerospace, agribusiness, defense, electrical, and medical device industries, among others. Most of our members are family-owned businesses.

The National Tooling and Machining Association’s 1,400 member companies design and manufacture special tools, dies, jigs, fixtures, gages, special machines and precision-machined parts. Some firms specialize in experimental research and development work as well as rapid prototyping. Many NTMA members are privately owned small businesses, yet the industry generates sales in excess of $40 billion a year. NTMA’s mission is to help members of the U.S. precision custom manufacturing industry achieve business success in a global economy through advocacy, advice, networking, information, programs and services.

The Precision Metalforming Association is the full-service trade association representing the $113-billion metalforming industry of North America—the industry that creates precision metal products using stamping, fabricating, spinning, slide forming and roll forming technologies, and other value-added processes. Its nearly 900 member companies also include suppliers of equipment, materials and services to the industry. PMA leads innovative member companies toward superior competitiveness and profitability through advocacy, networking, statistics, the PMA Educational Foundation, FABTECH and METALFORM Mexico tradeshows, and MetalForming and Fabricating Product News magazines.
NTMA and PMA strongly support a delay of compliance until at least December 1, 2017 as proposed by the Occupational Safety and Health Administration (OSHA) and believe that the Department should ultimately reconsider and revoke this harmful rule.

Given that the data collection system to be used under the rule has yet to be launched and will not be ready to launch until August 1, 2017, a five-month delay in the compliance date would allow affected employers time to familiarize themselves with the system to ensure compliance while also allowing the Administration time to review and reevaluate the rule.

Under the rule, businesses with 20 or more employees are required to submit electronically Form 300A that OSHA will put on its website for the general public. Larger businesses with more than 250 employees must submit quarterly Forms 300, 300A, and 301, which OSHA will also post online. However the information, without proper explanation to the general public, will mislead them to believe that manufacturing facilities are unsafe.

NTMA and PMA believe that the rule does not improve workplace safety and will only create a misperception of manufacturing as a dangerous occupation, making it tougher for manufacturers to recruit young people and qualified employees into manufacturing careers.

The notice for the proposed rule indicates OSHA’s intention to “reconsider, revise, or remove other provisions of the prior final rule.” NTMA and PMA applaud this action and welcome the opportunity to submit further comments on this burdensome rule, which will not improve workplace safety, but only hurt the image of manufacturing in America at a time when employers are struggling to recruit qualified workers into the industry.

Thank you for the opportunity to submit these comments for your consideration.

Sincerely,

Roy Hardy  
PMA President

Dave Tilstone  
NTMA President