March 3, 2025

The Honorable Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

The Honorable Russell Vought
Director
The Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Dear Administrator Zeldin and Director Vought,

American manufacturing dominance hinges on the ability to maintain a competitive edge in the global marketplace and for this, domestic manufacturers need access to the most modern and innovative technologies. This is especially true in the chemical manufacturing sector, and the EPA's Office of Chemical Safety and Pollution Prevention (OCSPP) is the gatekeeper for this innovation potential.

As you prepare the President's Budget for 2026, we appreciate your strong consideration for adequate funding and staffing for OCSPP. This is a licensing office that performs essential permitting and review functions for industrial, agricultural, and specialty chemicals. The functions of this EPA office advance American competitiveness, further transformative ideas, and promote new domestic manufacturing by processing applications for new and existing chemistries for a myriad of applications – in short ensuring that new products reach American and global consumers - **goals essential to this Administration**.

Specifically, through the EPA Office of Pollution Prevention and Toxics (OPPT), OCSPP reviews both new and existing chemicals that enable products from auto manufacturing to energy production to cleaning products among nearly all economic sectors. Predictable, timely, science-based reviews are essential to protecting domestic manufacturing jobs and ensuring American economic competitiveness. The Toxic Substances Control Act (TSCA) requires EPA to conduct reviews of new chemicals entering the market and make a determination before the product can be manufactured. In recent years **EPA has simply not met the 90-day requirement in the statute for the overwhelming majority of new chemicals**. It is important that EPA has adequate resources, modern technology, and sufficient staffing to conduct this vital role and to get the new chemicals program back on track.

Likewise, TSCA requires EPA to conduct reviews of chemicals already on the market that go into many critical products. To support American manufacturing and promote our national and economic security, these reviews must put sound science first, promote innovation and support supply chain resiliency. These reviews are time and resource intensive and it is essential that they be done transparently and objectively.

Similarly, through its Office of Pesticide Programs (OPP), OCSPP plays a unique and business-critical role enabling agricultural solutions by evaluating and registering new pesticide products that help farmers protect crops from resistance, disease, and weed and pest pressures; improve yields; feed, clothe, and fuel the world; and advance sustainable agriculture. Pesticide registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) as amended by the Pesticide Registration Improvement Act (PRIA) 5, advances a science- and risk-based EPA approval system that ensures innovative technologies meet rigorous safety standards while supporting U.S. farmers' ability to compete globally. Under PRIA 5, companies applying to OPP for registration or product label changes to respond to their customers pay fees in exchange for EPA's commitment to complete reviews on specific statutory timeframes, assuming all needed information is provided by the company applicant. According to OPP's own statistics, the Agency misses its deadlines **60 percent of the time across all categories, and 70 percent of the time for conventional agricultural pesticides**.

America's farmers are among the most productive in the world, but they are currently operating at a competitive disadvantage due to the backlog of innovative pesticides pending approval at OPP, some for multiple years past their PRIA deadlines. Moreover, the program is important to the nation's sixteen critical infrastructure sectors in maintaining the resilience of assets, systems, and networks that are considered vital to national security. Adequate funding for this office is critical to enable it to conduct its operations in a timely manner and to ensure farmers have access to the most modern technologies in the world.

Finally, EPA's Central Data Exchange (CDX), the computer system all companies must use to submit their applications to OCSPP, remains woefully out of date and consistently unstable and unreliable. When OCSPP reviewers request information to make regulatory decisions, companies are often unable to respond due to delays, unavailability, and sometimes multiple days where the CDX system is "down" and inoperable. CDX is overwhelmingly plagued with so many significant and ongoing technical issues that fixing the system appears to be an impossible task for OCSPP with its current resources, and companies are then thwarted in their ability to respond to OCSPP with requested information. In fact, as a result of the CDX delays, companies reported spending approximately 70-100 hours - or three times - the amount of time today as compared to past years just managing and finding work arounds to technical failures associated with the CDX. It is unclear how many hours of OSCPP staff time are also lost waiting for the system to come online to review files; this does not even speak to the significant vulnerability of the confidential business information companies send into the CDX system. The Administration's recent request for additional resources for this system will help with the critical functions OCSPP provides.

As you consider competing budget and policy priorities, we respectfully urge you to support adequate funding, technology investment, and staffing across these critical OCSPP offices. In the spirit of collaboration, it's critically important that EPA recognize the essential role they play in advancing innovation in the chemical manufacturing and agricultural chemical sectors, supporting U.S. business, maintaining a predictable and science-based regulatory process, and ensuring timely access to new tools to keep America a dominant global industry and agricultural leader.

Sincerely,

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