



In a recent survey, ILMA manufacturing members indicated what they saw as the biggest regulatory and legislative challenges to their businesses. Their answers formed ILMA's 2019 Advocacy Agenda, which will be taken to Washington, DC as we make connections with Congress and regulatory agencies throughout the year.

Affordable Care Act

ILMA Priorities: Support the Trump Administration's market-based reforms to expand competition and choice for the purchase of private health insurance and to lower costs to employers. Support allowing small and mid-sized businesses to join together voluntarily with other employers to form larger risk pools and purchasing arrangements across state lines. Support tax incentives to assist with the purchase of private health insurance. Support an increase in healthcare options and products (e.g., high-deductible policies and pre-tax accounts) available to employers and employees.

Infrastructure

ILMA Priorities: Support legislation to improve the condition and performance of the national freight network, including all modes of transportation, to ensure goods and products can be transported efficiently to compete in the global economy. Because infrastructure projects are a significant source of lubricant demand (e.g., hydraulic fluids and motor oils for construction equipment and machines), support policies intended to make it easier for small businesses to win public contracts that are put out to bid by state and federal governments.

Trade Agreements - USMCA

ILMA Priorities: Support open and fair-trade policies where all parties play by the same rules. Engage the office of U.S. Trade Representative and the White House Office of Manufacturing Policy to pursue policies that U.S. manufacturers benefit from the global economy. Support congressional approval of the U.S.-Mexico-Canada Agreement (USMCA) to replace NAFTA.

TSCA Reform

ILMA Priorities: Monitor and participate in EPA rulemakings to ensure that the final rules the Agency must promulgate under the 2016 TSCA Amendments are appropriately tailored to fit the needs of independent lubricant manufacturers and other chemical processors. Encourage efforts by EPA to ensure that its new chemicals program implements congressional intent to support innovation in U.S. chemical manufacturing, processing and use. As EPA conducts its risk evaluations for priority, existing chemicals, engage with the Agency on relevant downstream uses and information on hazards and potential exposures throughout the supply chain. Support efforts to ensure that EPA's "confidential business information" practice does not go beyond what Congress intended in its TSCA reform law.

EPA Amendments to SPCC

ILMA Priorities: Monitor and participate in EPA rulemaking that, as proposed, would rely on existing regulatory authorities rather than expand its SPCC rule to include “hazardous substance” ASTs. Facilitate meetings between membership and the Agency.

OSHA/Labor issues

ILMA Priorities: Continue to work with OSHA on GHS compliance issues and advocate for independent lubricant manufacturers in the expected rulemaking to improve HCS 2012. Support legislation and regulation to restore the time-tested balance between labor unions and employers at the Department of Labor and National Labor Relations Board. Support efforts to prevent OSHA’s attempts to remove “unexpected” from its lock-out/tag-out rule. Support Congressional action to undue “clarification” of employer’s obligation to make and maintain accurate records to ensure the OSH Act’s six-month limitation period remains intact.

Obsolete Oils

ILMA has been working with the National Conference on Weights and Measures to develop labeling requirements for engine oils that don’t meet an “active” API classification. The Association also has been monitoring initiatives within NCWM to require more explicit warnings on certain “303” THFs.