



August 3, 2010

Honorable David Michaels, PhD, MPH  
Assistant Secretary of Labor  
Occupational Safety and Health Administration  
U.S. Department of Labor  
200 Constitution Avenue, NW  
Washington, DC 20210

Dear Assistant Secretary Michaels:

On behalf of the nearly 10,000 industrial hygiene and related environmental health and safety professional members of the American Industrial Hygiene Association® (AIHA®), I am writing to express our sincere support for Secretary Solis' and your vision for OSHA as it moves forward in its mission to protect worker health and safety. Your recent document "OSHA at Forty: New Challenges and New Directions" was refreshing and exactly on target for where we as practicing professionals need to be in the coming years.

Your strategies and focus cover several different areas, and AIHA offers our support for all of these efforts to "transform" the agency. In particular:

- AIHA supports your view that deterrence is, and must be, an objective of OSHA enforcement activities. Employers must be encouraged to make an investment in the health and safety of their workers. And those who fail to make this investment must be held accountable. However, AIHA is also pleased that along with increased enforcement, your strategy recognizes the importance of compliance assistance and the role it plays in protecting workers. Dissemination of information and tools to assist employers plays an equal part in protecting workers, most notably through programs such as the Voluntary Protection Program (VPP). Programs such as VPP have shown that voluntary programs do improve worker health and safety.
- AIHA also supports efforts to strengthen OSHA's use of science. Activities firmly grounded in strong science will be more receptive to employers and workers and those professionals serving on the front line of worker health and safety. Much of this reliance on good science also involved improving interagency collaboration. For too long federal agencies have "gone it alone" when developing regulations and standards. AIHA is pleased that the relationship between OSHA and NIOSH is a strong one — one that should result in better and quicker ways to incorporate scientific advances into our regulatory and compliance assistance activities.
- AIHA would also like to provide comments, in particular, to your point to "ensure workers have a voice." This especially resonates with AIHA. Most recently, at a strategic planning meeting, our Board agreed in the coming 10 years that it will be paramount for us to do a vigorous job in "spreading knowledge everywhere so there is illness nowhere." It is only

through knowledgeable workers and communities that we can truly ensure that we have an active work force engaged in preventing injuries and illnesses. OSHA must play a role in this if we are to be successful. Your promise to conduct your work with “transparency, openness, integrity, and humility” will assist in this effort.

- AIHA supports an increased focus where both employees and employers “find and fix” hazards to reduce or eliminate risk. Because the formal regulatory process is essentially broken, increasing the focus on what really matters—identifying and eliminating hazards—will provide greater incentives for employers and employees to partner to make workplaces safer.
- AIHA supports modernizing workplace injury and illness tracking to identify data trends that will help both the agency and employers dedicate scarce resources to mitigating the most important occupational risks. Collecting accurate data will better help the agency (as well as employers and employees) address the problems of high risk workplaces and ensure that both workers and employers are treated fairly and equitably.

AIHA is prepared to stand shoulder to shoulder with Secretary Solis, the talented staff at the Department of Labor and OSHA, and you to ensure that your vision for the future is realized. Please do not hesitate to call on AIHA at any time.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael T. Brandt". The signature is fluid and cursive, with the first name "Michael" and last name "Brandt" clearly distinguishable.

Michael T. Brandt, DrPH, CIH, PMP  
AIHA President