

April 22, 2025

The Honorable Robert F. Kennedy, Jr.
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue SW
Washington, D.C. 20201

Dear Secretary Kennedy:

The undersigned organizations write regarding the proposed restructuring plan for the Department of Health and Human Services (HHS), in particular the National Institute for Occupational Safety and Health (NIOSH) and its National Personal Protective Technology Laboratory (NPPTL).¹ We represent employers and employees in every industry, who depend on the manufacture and use of certified personal protective equipment to safely employ millions of American workers.

We appreciate President Trump's commitment to growing the U.S. economy and supporting American workers. We also appreciate the Department's commitment, under your leadership, to streamline government and protect taxpayer resources. We will continue to work with the Administration to protect Americans' safety, health and prosperity.

The proposed restructuring plan involves several agencies under HHS, including NIOSH and the NPPTL. As part of its functions to support prevention of work-related injury and illness, NIOSH tests and certifies respiratory protective devices at the NPPTL.² Through the Respirator Approval Program, respiratory protective devices are examined, inspected, tested and certified for use in occupational settings.³

The certification of respiratory protective devices at NPPTL is integral to protecting U.S. competitiveness and the health and safety of American workers. Manufacturers benefit from NPPTL expertise and certification as they work to provide workers with trusted protection—for example, supplied air respirators are used to protect workers involved in the manufacture of automobiles and other industries, and emergency first responders depend on devices such as self-contained breathing apparatuses for their own safety and to provide critical services.

NPPTL certification also directly protects workers by preventing unscrupulous actors from flooding the market with counterfeit PPE. The proliferation of substandard respirators—in particular from China—is a recurrent problem.⁴ These faulty devices could expose employees to hazardous substances and ultimately make it more difficult and less safe for manufacturers to make things here in America.⁵

Potential disruptions in NPPTL respiratory protection certification personnel raises concerns for U.S. PPE manufacturers and end-users across industry.⁶ In addition to the impacts outlined above, disruptions at NIOSH and the NPPTL will impede availability of the latest respiratory

¹ <https://www.hhs.gov/press-room/hhs-restructuring-doge.html>

² <https://www.cdc.gov/niosh/npptl/about.html>

³ <https://www.cdc.gov/niosh/npptl/respmanuf.html>

⁴ <https://www.cbsnews.com/news/n95-masks-fake-seized/>

⁵ <https://www.cdc.gov/niosh/npptl/usernotices/counterfeitResp.html>

⁶ <https://www.cbsnews.com/news/rfk-jr-layoffs-hhs-niosh-worker-safety-agency/>

protection technology and increase uncertainty for employers who rely on NIOSH certification to meet safety standards prescribed by the Occupational Safety and Health Administration and the Mine Safety and Health Administration, among other entities.^{7,8}

We respectfully request that the Department fully consider potential impacts to manufacturers and workers in America before finalizing any reductions in force at NPPTL. We are committed to safety and working with the Department to illustrate the importance of continued public-private cooperation in respiratory protection.⁹

Together we can ensure the continued competitiveness of manufacturing in America and the protection of American workers.

Sincerely,

The Aluminum Association
Alliance for Chemical Distribution
American Chemistry Council
American Coke and Coal Chemicals Institute
American Forest & Paper Association
American Foundry Society
American Wood Council
Associated Builders and Contractors
Associated General Contractors of America
ECIA – Electronic Components Industry Association
Essential Minerals Association
The Fertilizer Institute
Flexible Packaging Association
Foodservice Equipment Distributors Association
Independent Lubricant Manufacturers Association
Industrial Packaging Alliance of North America
Institute of Makers of Explosives
International Safety Equipment Association (ISEA)
ISSA, The Worldwide Cleaning Industry Association
Mechanical Contractors Association of America
National Association of Manufacturers
National Demolition Association (NDA)
National Electrical Contractors Association (NECA)
National Elevator Industry, Inc.
National Marine Manufacturers Association
National Mining Association
National Roofing Contractors Association
National Safety Council
National Stone, Sand & Gravel Association
National Waste & Recycling Association
North American Association of Food Equipment Manufacturers (NAFEM)
North American Insulation Manufacturers Association
PRINTING United Alliance

⁷ <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134>

⁸ <https://www.ecfr.gov/current/title-30/chapter-I/subchapter-M/part-60>

⁹ <https://www.cdc.gov/niosh/npptl/respcertfee.html>

The Recycled Materials Association (ReMA)
Society of Chemical Manufacturers and Affiliates (SOCMA)
Steel Tank Institute/Steel Plate Fabricators Association
The Sulphur Institute
Tree Care Industry Association
TRSA – The Linen, Uniform and Facility Services Association
U.S. Chamber of Commerce
Vinyl Institute

CC: Secretary Lori Chavez-DeRemer, Department of Labor
Chair Susan Collins, Senate Committee on Appropriations
Chairman Bill Cassidy, M.D., Senate Committee on Health, Education, Labor and Pensions
Vice Chair Patty Murray, Senate Committee on Appropriations
Ranking Member Bernard Sanders, Senate Committee on Health, Education, Labor and Pensions
Chairman Tom Cole, House Committee on Appropriations
Chairman Brett Guthrie, House Committee on Energy and Commerce
Ranking Member Rosa L. DeLauro, House Committee on Appropriations
Ranking Member Frank Pallone, Jr., House Committee on Energy and Commerce