



To: OSHA Transition Team of President-Elect Biden

Subject: IDFA Policy Priorities for 2021

The International Dairy Foods Association (IDFA), based in Washington, DC, represents the nation's dairy manufacturing and marketing industry, which supports more than 3 million jobs that generate \$159 billion in wages and \$620 billion in overall economic impact for the United States. IDFA members include a range of dairy processing companies, dairy farmer cooperatives, numerous food retailers, suppliers, and other companies. Together they represent approximately 90 percent of the milk, cultured products, cheese, ice cream, infant formula and dairy ingredients produced and marketed in the United States and sold throughout the world. IDFA members are proud to provide safe, nutritious and sustainable dairy foods to people of all ages, everywhere.

Occupational Safety and Health Administration

- A. Department of Labor (DOL)/OSHA regulations should be reasonable, timely, data-driven and protect worker privacy.** DOL/OSHA regulations should be aimed at improving worker safety outcomes while not imposing overly burdensome reporting requirements that compromise worker privacy or impose unreasonable and unpracticable safety standards.

Status: The COVID-19 pandemic illustrated the need by OSHA and DOL to provide reasonable and data-driven regulations and guidance that are actionable and delivered in a timely manner. These agencies should strive to seek industry input as early as possible to facilitate the publication of pragmatic rules. Moreover, given the rapidly evolving science and circumstances of the pandemic, OSHA and DOL need to ensure the public is referencing the most current versions of these materials especially when rules and guidance supersede earlier versions. Therefore, the agencies must better coordinate revisions and more clearly list the date (month/day/year) on each document or resource.