



# 2023 Officers' Training Week





ASTM INTERNATIONAL  
Helping our world work better

# Public Policy and Stakeholder Outreach

September 2023

Craig Updyke and Matthew Pezzella

[www.astm.org](http://www.astm.org)



# ASTM International

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- **About ASTM International**

- Non-governmental, not-for-profit organization
- Develops voluntary, consensus standards
- Provides certain, specific certification and training programs (CCRL, SEI)
- Does not provide accreditation services

- **ASTM's objectives**

- Promote public health and safety, and the overall quality of life
- Contribute to the reliability of materials, products, systems and services
- Facilitate national, regional, and international commerce

# Role of Standards

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- **Standards in the Public and Private Sector**
  - Impact global trade, innovation, and competition
  - Guide product design, development, and market access
  - Used by companies, research labs, and government agencies
- **ASTM International Standards**
  - Voluntary consensus standards
  - Regularly reviewed
  - Meet World Trade Organization (WTO) principles for international standards
  - Remove barriers to the worldwide acceptance and use of our standards

# U.S. Standards System

- Voluntary and led by the private sector
- Requires cooperation among stakeholders (Public-Private Partnership)
  - Standards Developing Organizations (SDOs)
  - Industry, consumers, and users
  - Government representatives
  - Academia
- Meets stakeholders' needs
  - Protect safety, health, and environment
  - Improve industry competitiveness
  - Facilitate global trade and market access





# Public Policy

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# ASTM in Washington, DC

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- **Government Affairs**

- United States Congress
- Federal government agencies (EPA, FDA, CPSC, etc.)

- **Stakeholder Outreach**

- Companies
- Foreign countries: Embassy officials based in Washington
- Industry/Trade associations
  - (Natl. Assoc. of Manufacturers, U.S Chamber of Commerce, etc.)
- Inter-Governmental and International Non-Governmental Organizations (NGOs)
- ANSI and other Standards Developing Organizations (SDOs)

# U.S. Legal and Policy Framework

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- **National Technology Transfer and Advancement Act of 1995 (NTTAA)**
  - Requires federal government agencies to use standards developed by voluntary consensus standards organization when possible
  - Encourages federal government agencies to participate in standards development organizations
- **OMB Circular No. A-119**
  - Reinforces goals of NTTAA
  - Updated in 2016
  - Discourages federal agencies from using government-unique standards



# Support and Mandate for Government Participation

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**P.L. 104-113**

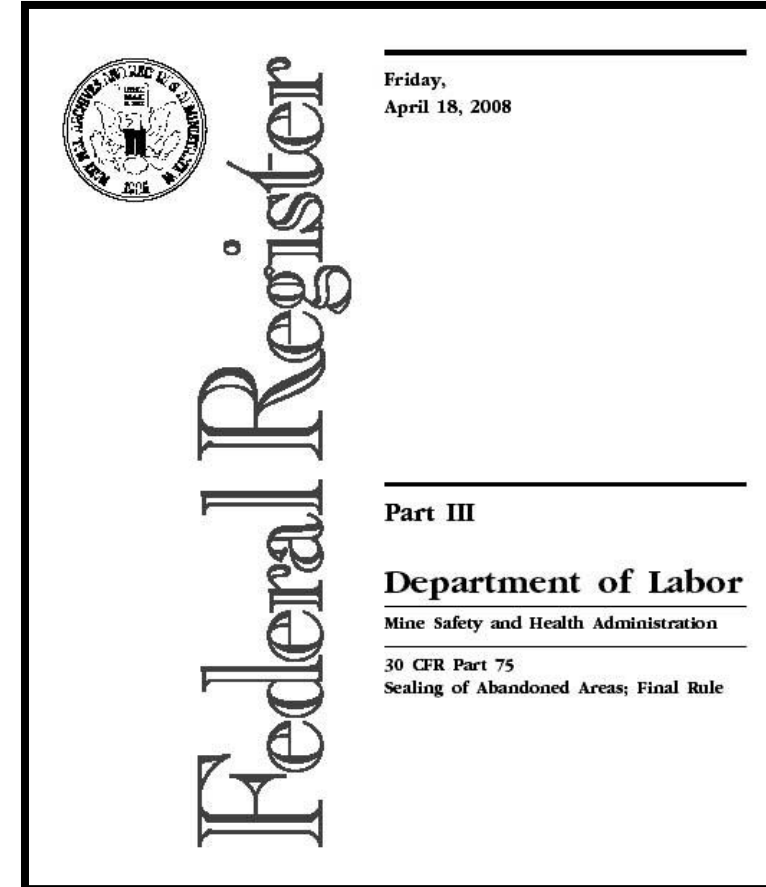
## **National Technology Transfer and Advancement Act of 1995 (NTTAA)**

“...all Federal agencies and departments shall use technical standards that are developed or adopted by voluntary consensus standards bodies, ....and shall, ...participate with such bodies in the development of technical standards.”

# Federal Agencies & ASTM Standards



- **U.S. Code of Federal Regulations (CFR)**
  - 6,500 voluntary consensus standards incorporated by reference in federal law
  - About 3,000 ASTM standards listed in CFR for regulations and procurement
- **U.S. Federal Register**
  - Public notification of standards adoptions
  - Instructions for public comments



# Incorporation By Reference (IBR)

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- Regulation that incorporates standard by reference
  - An agency may adopt a voluntary standard (without changes) by incorporating the standard in a regulation by listing (or referencing) the standard by title.
  - This approach eliminates the cost to the agency of creating a new standard
- Regulation based on existing standard
  - An agency reviews an existing standard and makes changes to match its goal or need.
- Agency conducts rulemaking process to solicit public opinion and stakeholder input
  - Public Notification and Comments
    - An agency must publish a notice in the Federal Register when making a new rule or incorporating a standard by reference
- When creating a new rule based on an existing standard, an agency may change the proposed rule in response to public comments


# Top 10 Regulatory SDOs in US



Standards Developing Organization	Acronym	Number
<a href="#">American Society for Testing and Materials</a>	ASTM	2566
<a href="#">U.S. Environmental Protection Agency</a>	EPA	1471
<a href="#">American Public Health Association</a>	APHA	816
<a href="#">American Society of Mechanical Engineers</a>	ASME	768
<a href="#">American National Standards Institute</a>	ANSI	677
<a href="#">National Fire Protection Association</a>	NFPA	589
<a href="#">International Maritime Organization</a>	IMO	579
<a href="#">Society of Automotive Engineers</a>	SAE	437
<a href="#">Reprographic Technologies</a>		351
<a href="#">National Highway Traffic Safety Administration, U.S. Department of Transportation</a>	DOT/NHTSA	344

# ASTM Assists with Transparency in Rulemaking



← → ↻ www.astm.org/READINGLIBRARY/

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- Lab Directory
- Cement & Concrete Reference Lab

## Reading Room

This is a service where you can view and read ASTM safety standards incorporated in United States regulations.


The standards are presented for online reading. There are no print or download options. To acquire the current version of the standards with print and download options, follow the hyperlink to the current version.

**CAUTION:** The ASTM standards available on this site are the versions and year-dates actually referenced in the respective federal regulation or law. The ASTM standard referenced MAY NOT BE THE MOST RECENT OR UP-TO-DATE version available. It is possible that the standard and/or technology at issue has changed or been updated during the period of time since the regulation/law was enacted. As a non-governmental organization, ASTM does not control which ASTM standards (and versions thereto) are referenced in federal regulations or laws.

Send comments or questions to [service@astm.org](mailto:service@astm.org)

[OPEN READING ROOM](#)

**Recommended**



**Test Methods and Testing Programs**

Standardized test methods play a vital role in the development, manufacturing and global trade of the products we rely on every day. View a brochure that explains how ASTM's test methods and supporting programs make global testing easier.

ASTM standards IBR are provided in a read-only format to the general public in the Reading Room.

# When a Staff Manager Sends You a *Federal Register* Document



- Rules
  - Final Rule
  - Interim Final Rule
- Proposed Rules
  - Notice of Proposed Rulemaking (NPRM)
  - Supplemental notice of proposed rulemaking
  - Request for Information (RFI)
- Notices
  - Presidential Document (Executive Order)

## National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing Facilities Residual Risk and Technology Review

A Rule by the [Environmental Protection Agency](#) on 07/13/2020



**PUBLISHED DOCUMENT**

Start Printed Page 42074

**AGENCY:**  
Environmental Protection Agency (EPA).

**ACTION:**  
Final rule.

**SUMMARY:**  
This action finalizes the residual risk and technology review (RTR) conducted for the Integrated Iron and Steel Manufacturing Facilities source category regulated under national emission standards for hazardous air pollutants (NESHAP). The Agency found that risks due to emissions of air toxics from this source category are acceptable and that the current NESHAP provides an ample margin of safety

**DOCUMENT DETAILS**

**Printed version:**  
[PDF](#)

**Publication Date:**  
07/13/2020

**Agency:**  
[Environmental Protection Agency](#)

**Dates:**  
This final rule is effective on July 13, 2020. The incorporation by reference (IBR) of certain publications listed in the rule is approved by the Director of the Federal Register as of July 13, 2020.

**Effective Date:**  
07/13/2020



# U.S. Federal Register - Do's and Don'ts



- Formal comments are allowed on:
  - Rules, Proposed Rules, and Notices
- ASTM Commenting Guidelines
  - **DO**
    - Coordinate with the Staff Manager, Public Policy Team, and ASTM President's Office
    - Ask for approval before using ASTM branding
  - **DO NOT**
    - Misrepresent a relationship with ASTM
    - Send unapproved comments



# Federal Register – Recent Comments

- Securities & Exchange Commission (SEC)
  - Enhancement & Standardization of Climate-Risk Disclosures for Investors
    - Proposed Rule
- Food & Drug Administration (FDA)
  - 3D Printing Medical Devices at the Point of Care
    - Discussion Paper – request for comments
- Department of Energy (DOE)
  - Advanced Manufacturing Office for Information on Industry Priorities for Decarbonization
    - Request for Information (RFI)
- Occupational Safety & Health Admin. (OSHA)
  - COVID-19 Vaccination and Testing; Emergency Temporary Standard
    - Interim final rule and request for comments



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January 14, 2022

Edmund C. Baird  
Associate Solicitor for Occupational Safety and Health  
Office of the Solicitor  
U.S. Department of Labor  
200 Constitution Ave. NW  
Washington, DC 20210

*Submitted electronically via [www.regulations.gov](http://www.regulations.gov)*

Re: ASTM International Comment on OSHA Docket No. OSHA-2021-0007, COVID-19 Vaccination and Testing; Emergency Temporary Standard

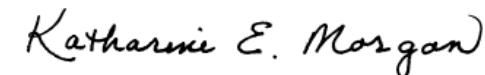
Dear Mr. Baird:

On behalf of ASTM International's Committee F23 on Personal Protective Clothing and Equipment, the Executive Committee has approved the attached letter in response to the Occupational Safety and Health Administration's COVID-19 Vaccination and Testing; Emergency Temporary Standard.

Committee F23 is one of 147 ASTM technical committees composed of experts who represent producer, user, government, and academic stakeholder interests in the development of voluntary consensus standards for materials, products, systems, and services. Committee F23 adheres to well-regarded, industry-recognized, and time-tested principles for the development of consensus standards that reflect current technology and industry practice.

Thank you for the opportunity to submit these comments. Please feel free to contact Matthew Pezzella in the ASTM Washington Office at 202-223-8399 or [mpezzella@astm.org](mailto:mpezzella@astm.org) to discuss these comments or any issues related to this letter.

Sincerely,



Katharine E. Morgan  
President

# U.S. Government Membership in ASTM

Agency Name	Members
Department of Agriculture	42
Department of Commerce (incl. NIST)	185
Consumer Product Safety Commission	70
Department of Defense	236
Department of Energy	139
Environmental Protection Agency	74
Federal Aviation Administration	75
Department of Health and Human Services (incl. FDA)	104
Housing and Urban Development	6

Agency Name	Members
Department of Interior	17
Department of Justice	20
NASA	51
Nuclear Regulatory Commission	14
Occupational Safety & Health Administration	10
Department of Transportation	133
Total Federal Government Membership	1,176

\*As of June 2021

# Proven Partnership - CPSC



Chair Alexander Hoehn-Saric



Commissioner Mary Boyle



Commissioner Peter Feldman

- Consumer Product Safety Improvement Act (CPSIA)
  - Section 106 - Congress mandated that ASTM F963, Consumer Safety Specification for Toy Safety, become a mandatory standard for improving toy safety
  - Section 104 - Congress identified categories for durable products intended for children under five for which CPSC was to develop standards - including highchairs, baby gates, booster seats and bassinets - based on ASTM's process and, where applicable, on existing standards

# Stakeholder Outreach



# ASTM Engages Decision-Makers

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- **Raise awareness of standards and ASTM**
  - Standards facilitate trade and boost GDP
  - No WTO list of international bodies
- **Identify opportunities for collaboration on issues of mutual interest**
  - Reduce internal company specifications
- **Seek industry feedback on activities and challenges**
  - ASTM supports industry needs to choose the best standard, regardless of the source
- **Ensure ASTM is meeting stakeholder needs**
  - Satisfy regulations and laws
  - Facilitate global trade





# Stakeholder Outreach – Examples

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- Plant Based Products Council (PBPC)
  - Discussed the Farm Bill and the Biopreferred Program which reference D6866
  - Other topics: hemp-based products, compostable products, and terminology
- Cannabis Regulators Association (CANNRA)
  - Strategized on state regulator membership and references to D37 standards
  - Attend CANNRA's yearly External Stakeholder Meeting & participate in a standards panel
- American Council of Independent Laboratories (ACIL)
  - Testing sectors include conformity assessment, science, and construction materials
  - Organized future meetings with senior staff and Board of Directors
- Carbon Business Council
  - A coalition of carbon management companies working to address climate change
  - Emerging sector in need of terminology standards for industry and regulators

# ASTM Standards Impact the Global Economy



- **ASTM standards meet World Trade Organization (WTO) criteria for “international standards”**
  - No WTO list of international bodies
  - WTO recognizes multiple approaches to international standardization
- **ASTM makes it easy to participate in international standards development**
  - Technology drives efficiency



# ASTM in Europe

Over 1,100 technical experts from European Member States work collaboratively with their peers from more than 100 other countries to develop global standards and solutions that improve performance and operability in manufacturing, materials, products, processes and more.

Opened an ASTM Office of European Affairs in 2013 in Brussels, to interface with European institutions, ESO's and NSBs, trade federations, consumer groups, companies and research institutes.

**+400 ASTM references in European Laws**

**ASTM Standards & Engineering Digital Library**  
used by universities in UK, Denmark, France, Germany, Poland, Spain

# ASTM Brussels Office

- **At your service**

- liaison with institutions and stakeholders in Europe and globally
- European and Natl. SOs (CEN, CENELEC, DIN, BSI, etc.) and industry groups
- facilitate technical and political connections
- build relationships with ASTM members worldwide
- identify and address relevant EU policies
- educate Europeans on ASTM and address misperceptions of U.S. standards system

- **European membership benefits**

- develop new and revise existing standards
- equal say, voting rights in ASTM process
- network with peers from around the world, gain professional development opportunities
- receive info on standards relevant to your business or organization

50%  
of ASTM standards  
are distributed  
outside the United  
States

# ASTM Global Membership



ASTM/MOU

ASTM International's Memorandum of Understanding (MOU) program supports the principles of the World Trade Organizations' Technical Barriers to Trade Agreement.

ASTM has memoranda of understanding with 98 National standards bodies around the globe

- Both ASTM Members and MOU Partners
- ASTM MOU Partners Only
- ASTM Members Only

## Offices In:

W. Conshohocken, PA  
(USA – HQ)  
Beijing, China  
Brussels, Belgium  
Lima, Peru  
Ottawa, Canada  
Washington, DC

# Moving Forward

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- **ASTM seeks to enhance our level of cooperation and work with government and standards officials and stakeholders to:**
- **Promote** a global marketplace that is open, efficient, free of costly duplication, free of technical barriers, and free of national or regional limitations.
- **Produce** high-quality and market relevant standards that advance R&D, product manufacturing, testing, quality assurance, marketing, and trade for both companies and SMEs.
- **Advance** the ability of industries to choose the standards which best meet their needs.
- Our global approach to standards development and use can **help the world to work better** through improved products, increased trade, and greater prosperity for the future.



# Current Events in Washington, DC

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# Questions and Discussion

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# Contact Information

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