



May 9, 2022

The Honorable Martin J. Walsh
 Secretary
 United States Department of Labor
 200 Constitution Ave, N.W.
 Washington, DC 20210

Dear Secretary Walsh:

We are reaching out to you on behalf of the undersigned organizations to call upon the United States Department of Labor to immediately cease any actions that threaten Arizona’s state-plan status, which has been in place since 1985. Collectively, our organizations represent hundreds of thousands of hardworking Arizonans and business owners across multiple industry sectors. We are greatly concerned about the Occupational Safety and Health Administration’s (OSHA) recent proposal to reconsider and revoke the Arizona State Plan and revert to federal enforcement.

Arizona has operated a highly-effective occupational safety and health program for nearly 50 years – a program that we view as equally if not more effective than most federally-operated states. Any intrusion into Arizona by OSHA would jeopardize the system Arizona has worked diligently to cultivate and would be detrimental to Arizona’s employees, employers, and economy.

According to the [most-recent data](#) from the Federal Bureau of Labor Statistics, Arizona’s fatal injury rate is 3.1 - far less than the national average of 4.1 and significantly less than the 3.8 rate in OSHA-operated states. Arizona’s comparatively low worker fatality rate is even more striking given that Arizona is one of the fastest-growing states in the country.

The effectiveness of the Arizona State Plan, however, is reflected in more than metrics. Arizona has a unique and successful approach to addressing occupational safety and health that reflects the State’s collaborative environment and culture. Arizona emphasizes strong relationships with both workers and industry that is aimed at proactively preventing workplace injuries from occurring. For example, in Fiscal Year 2021, the Arizona Division of Occupational Safety and Health (ADOSH) completed over 1,000 consultations visits, impacting over

26,000 workers, provided training to nearly 16,000 workers, and worked with employers and workers to abate over 4,500 hazards.

The success of Arizona's approach is also evident in the sheer number of employers participating in partnership programs with ADOSH. Indeed, the number of Arizona employers participating in the Voluntary Protection Program per capita far surpasses the average number of employers participating in OSHA-operated states.

For all these reasons, we strongly urge the U.S. Department of Labor to cease this imprudent approach and instead take steps to collaborate with Arizona to strengthen its long-standing and successful occupational safety and health program.

Sincerely,

American Subcontractors Association of Arizona
Arizona Automotive Wholesalers Association
Arizona Bankers Association
Arizona Builders Alliance
Arizona Chamber of Commerce & Industry
Arizona Chapter National Safety Council
Arizona Chapter of the Associated General Contractors of America, Inc.
Arizona Farm Bureau Federation
Arizona Lodging and Tourism Association
Arizona Manufacturers Council
Arizona Multihousing Association
Arizona Restaurant Association
Arizona Small Business Association
Arizona Transportation Builders Association
Arizona Trucking Association
Chandler Chamber of Commerce
Greater Flagstaff Chamber of Commerce
Greater Phoenix Chamber of Commerce
Independent Insurance Agents and Brokers of Arizona, Inc.
Lake Havasu Area Chamber of Commerce
Mesa Chamber of Commerce
National Association of Industrial Office Properties (NAIOP) Arizona Chapter
North Phoenix Chamber of Commerce
Prescott Chamber of Commerce
Prescott Valley Chamber of Commerce
Sierra Vista Area Chamber of Commerce
Southern Arizona Home Builders Association
Southern Arizona Leadership Council
Tucson Metro Chamber
United Dairymen of Arizona