BANNOCKBURN, IL — IPC president John Mitchell took the industry's case against Dodd-Frank to the US House of Representatives, outlining in a letter how existing and proposed regulations could hurt the electronics manufacturing industry.

In a June 1 letter to US House Oversight Committee Chairman Darrell Issa (R-CA), Mitchell identified four issues that pose a "significant burden" to the industry and could contribute to the continued decline of employment in the US electronics manufacturing sector.

The letter takes issue with the regulations on conflict minerals being developed by the Security and Exchange Commission under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. According to IPC, the proposed regulations "could impose extremely burdensome reporting requirements on manufacturers that use tin, gold, tantalum and tungsten in their products."

"While IPC supports the underlying goal of Section 1502 which is to address the grave human rights situation in the Democratic Republic of the Congo, it is concerned that the SEC's draft regulations place a great burden on the private sector with little regard for the impact they will have on small businesses and the relief they will offer the people" of the region, IPC said.

The IPC further criticized the **Environmental Protection Agency** Chemical Data Reporting (CDR) rule, which replaced the Toxic Substances Control Act Inventory Update Reporting rule, as a burdensome regulation with little benefit. "It penalizes manufacturers for doing what the EPA and other environmentally conscious non-governmental organizations would normally consider laudable — recycling," IPC said. "By requiring all manufacturers that recycle byproducts to report those byproducts as 'new chemicals,' the EPA creates burdensome, costly and unnecessary regulatory requirements that discourage recycling. In addition, the Chemical Data Reporting (CDR)/IUR rule results in duplicate, and in some cases triplicate, annual reporting of many of these byproducts which are already reported under the EPA's Toxics Release Inventory (TRI) program and under Resource Conservation and Recovery Act (RCRA) biennial reporting."

"The EPA's 2011 proposed changes to the 2008 DSW rule would impose significant regulatory burdens and undermine the goals of the 2008 rule which was to encourage recycling. The recycling of a number of secondary materials streams in PCB and

other manufacturing industries would be more fully realized if the 2008 regulatory reforms were not undermined by the regressive 2011 proposal," IPC continued.

IPC also cited its members' increasing concerns that **OSHA** is stretching the boundaries of its authority to support expansive interpretation and enforcement of
OSHA regulations. IPC cited a pair of recent court decisions in which citations and penalties were overturn as proof of the overreach.