

Transportation Labor Calls on the Trump Administration to Maintain a Robust Regulatory Framework and Finalize Work Safety Rules

TTD and its Executive Committee have long championed the value of a robust regulatory regime as many of the most critical policies that affect transportation workers are codified in the regulations, guidance documents, and agency orders within the Department of Transportation (DOT) and its modal agencies, as well as the Department of Labor (DOL). Regulations form the backbone of worker protections in this country, whether they directly address workplace safety issues or set broad industry standards. A strong regulatory framework is an essential component of a safe and efficient transportation system, and any efforts to subvert, weaken, or eliminate critical safety regulations will be strongly opposed by transportation labor.

Too often, the political discourse treats the regulatory functions of the federal government as inherently good or inherently bad. This type of discourse overlooks the subject matter or goals of individual regulations, as well as the incident(s) that made regulations necessary in the first place. Any talk of removing two (or ten) regulations for every new regulation implemented ignores the monumental leaps in safety and competitiveness that our regulatory regime has ushered in as a result of being responsive to a rapidly changing national transportation system. Far too often, regulations are put in place in response to terrible tragedies that policy makers, unions, and industries have vowed should never happen again. It is simply irresponsible to treat regulations as poker chips without critically evaluating their role in safety.

To protect the interests of transportation workers, first responders, and the travelling public, we call on the DOT and the DOL to finalize crucial worker safety rules, including the Emergency Response Standard and the Heat Injury and Illness Prevention Standard; deny industry requests for broad, repetitive, and excessive regulatory waivers; and reject efforts to deregulate the transportation sector.

Emergency Response Standard

Last year, the Occupational Safety and Health Administration (OSHA) proposed a new safety and health standard, the Emergency Response Standard, to replace the existing Fire Brigades Standard. From responding to the derailment of freight trains carrying hazardous materials in residential communities to suppressing fires at airports, our transportation system could not safely function without firefighters. Sadly, too often, the fire service is left ill-equipped, insufficiently trained, understaffed, and underfunded to respond to emergencies safely. We appreciate OSHA's efforts to remedy these unacceptable realities and urge DOL to move swiftly to finalize this regulation.

Heat Injury and Illness Prevention Standard

Early this year, TTD filed public [comments](#) in response to OSHA's proposed safety and health standard, titled Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings. The undeniable reality is that too many workers, including transportation workers, are dying on the job as a result of extreme heat. We have previously called upon OSHA to codify a federal heat protection standard that would ensure adequate rest breaks, access to hydration and appropriate personal protective equipment (PPE), and comprehensive training on recognizing and addressing signs of dehydration, heatstroke, and other heat-related conditions. We are encouraged to see that OSHA's proposed rule incorporates many of these important provisions and call on the DOL to quickly codify them in a final rule.

Excessive Waiver Requests

In addition to finalizing these proposed rules, we urge the DOT and its operating administrations, like the FRA, to scrutinize previously granted safety waivers to ensure that those waivers actually effectively increase, and not decrease, safety. During his nomination process, [Secretary Sean Duffy assured Congress](#) that safety will drive all decision-making on requests for waivers to safety regulations at DOT and that waivers must ensure safety will not be compromised. Transportation labor has long held concerns about the frequency with which broad safety waivers are requested and granted. If these waivers are found to decrease safety, they are not in the public interest and should be terminated immediately. A patchwork system of waivers that enable inconsistent procedures and operations is not as safe and effective as a comprehensive approach to transportation regulations.

Industry Deregulation Schemes

Similarly, we encourage the administration to reject industry requests for extensive deregulation across the transportation space. For example, the Association of American Railroads (AAR) filed [public comments](#) detailing more than 80 rail safety regulations the industry group would like repealed or modified in the name of efficiency. This request, however, ignores the dangerous reality of a rail industry that often puts rail workers at risk and routinely experiences significant accidents and incidents. The solution is clear: the administration must maintain existing safety regulations and thoughtfully consider additional regulations to improve safety and working conditions across the transportation sector.

TTD and its Executive Committee reaffirm our strong commitment to a robust regulatory framework as a cornerstone of worker safety and public well-being across the transportation sector. Finalizing vital rules such as OSHA's Emergency Response Standard and the Heat Injury and Illness Prevention Standard is urgent. These standards address long-standing gaps in worker protection, particularly for those on the frontlines of emergency response and those increasingly exposed to extreme environmental conditions. Additionally, the unchecked use of broad regulatory waivers undermines the consistency and effectiveness of safety measures, posing

unacceptable risks to workers and the traveling public alike. We therefore call on the Department of Labor and the Department of Transportation to act decisively: finalize these life-saving rules and reject efforts that would erode the regulatory safety net transportation workers depend on every day.

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