



May 13, 2026

Representative Mackenzie
Chair, Subcommittee on Workforce
Protections
House Education and Workforce
Committee
2176 Rayburn House Office Building
Washington, DC 20515

Representative Omar
Ranking Member, Subcommittee on
Workforce Protections
House Education and Workforce
Committee
2176 Rayburn House Office Building
Washington, DC 20515

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David White, CAE
Tree Care Industry Association
Manchester, New Hampshire

Dear Chair Mackenzie and Ranking Member Omar:

On behalf of the Tree Care Industry Association (TCIA), I write to thank you for holding your hearing “Building a Safer Future: Private-Sector Strategies for Emerging Safety Issues.” One workplace safety issue that urgently needs to be addressed is the lack of an industry-specific safety standard for the tree care industry. The Occupational Safety and Health Administration (OSHA) is currently working on a proposed rulemaking,¹ and we urge the committee to maintain robust oversight to ensure the agency advances and finalizes the rulemaking without delay to better protect the nation’s tree care workforce.

TCIA represents 1,400 businesses nationwide that engage in commercial tree care, providing services to residential communities, state and local governments, commercial businesses, and utilities. Collectively, TCIA members employ more than 150,000 people, representing an estimated 75% of all tree care workers in the country. Their work safeguards homeowners, businesses, and communities from hazards that threaten critical infrastructure, such as powerlines and roadways. Our members conduct wildfire prevention work and provide essential services in the wake of hurricanes, winter storms, and tornados. They also help preserve the beauty and health of our natural spaces.

Tree care work is critical to our communities, but arboriculture remains a dangerous profession. Tree care workers suffer serious and even fatal accidents at rates well above all-industry norms.² These hazards are longstanding and well documented—falls, struck-by incidents, and electrocution account for the vast majority of tree care fatalities. Despite this reality, OSHA currently regulates our industry through a patchwork of standards designed for industries and workplaces whose operations differ significantly from tree care. This has left both employers and compliance officers without clear, applicable guidance, resulting in inconsistent and reactive enforcement. In response, TCIA formally petitioned OSHA for an industry-specific safety standard in 2006 and has continued to advocate for one since.

¹ Tree Care Standard, Spring 2025 Unified Agenda of Regulatory and Deregulatory Actions, <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202504&RIN=1218-AD04>.

² Safeguarding Workers and Employers from OSHA Overreach and Skewed Priorities, 118th Cong. Page 2. (2024) (testimony of Peter Gerstenberger), https://edworkforce.house.gov/uploadedfiles/gerstenberger_testimony.pdf.

Without a dedicated tree care-specific standard, TCIA and its members have prioritized safety through the development of the ANSI Z133 standard—the industry’s consensus safety standard for tree care operations—as well as credentialing programs, worker training initiatives, and direct engagement with OSHA and State Plan OSHAs to improve safety regulations. While these efforts have helped establish widely accepted safety practices across much of the tree care industry, a formal OSHA standard would build upon that foundation and help extend those protections more consistently across the profession.

OSHA’s Tree Care Standard rulemaking would replace the agency’s current method of regulating our industry through multiple ill-fitting rules and guidance from other industries with a clear, consistent standard tailored to our industry’s unique hazards. If crafted properly, such a standard would provide practical and enforceable safety requirements that directly address the leading causes of injury and death in our high-hazard profession.

OSHA itself acknowledged the hazards facing the tree care industry as early as its 2008 Advanced Notice of Proposed Rulemaking. The last major procedural step, however, occurred in 2020 when OSHA convened a Small Business Regulatory Enforcement Fairness Act (SBREFA) panel. Since then, OSHA has repeatedly postponed publication of a proposed rule. The most recent Regulatory Agenda identified April 2026 for issuing a proposal, though that deadline has now passed.

In May 2025, TCIA testified before the subcommittee to underscore the urgent need for a dedicated standard.³ Congress continues to demonstrate bipartisan support for completing this rulemaking, recognizing that a focused, industry-specific standard would improve safety and provide clearer, more consistent compliance expectations.

TCIA thanks you for holding this important hearing. Please support the tree care industry and our workers in our efforts to complete this long-overdue initiative—one that will enhance worker protection in a demonstrably high-hazard industry, apply controls already recognized as feasible and effective, improve regulatory clarity, and serve as a model of thoughtful, streamlined regulation. We look forward to working with the committee on this critical issue and stand ready to assist the committee in any way we can.

Sincerely,

A handwritten signature in black ink, appearing to read "David White". The signature is fluid and cursive, with a large initial "D" and "W".

David White, CAE
President & CEO, TCIA

cc: Member of the House Education and Workforce Committee

³ House Subcommittee on Workforce Protections Hearing, “Reclaiming OSHA’s Mission: Ensuring Safety without Overreach,” May 15, 2025.