

RESOLUTION CONCERNING USDOL Proposed Rulemaking Regarding Apprentice Programs

WHEREAS, companies in the biopharmaceutical industry and members of America's building trades unions have a 15-year history of partnership, formally united through the Pharmaceutical Industry Labor-Management Association (PILMA); and,

WHEREAS, the biopharmaceutical industry is a world-leader in innovation, which leads to new discoveries that cure disease, save lives and contributes to U.S. economic growth; and,

WHEREAS, through this investment in future medical innovation, the biopharmaceutical sector is responsible for the largest share of business R&D in the U.S. economy and supports more than 4.7 million American jobs; and,

WHEREAS, North America's Building Trades Unions' (NABTU) registered apprenticeship program trains members to become the safest, most productive and highest-skilled workers in the world, spending more than \$1.5 billion annually at over 1,600 training centers nationwide, all privately funded; and,

WHEREAS, members of NABTU's registered apprenticeship program earn while they learn, graduate from the program debt-free and receive high-quality healthcare and retirement benefits using no taxpayer dollars; and,

WHEREAS, the skills required to build biopharmaceutical facilities require exacting precision and state-of-the-art technique to ensure the safety and efficacy of life-saving treatments and cures; and,

WHEREAS, the biopharmaceutical member companies of PILMA rely on the immediate ability to employ members of the building trades unions to build facilities as the need arises; and,

WHEREAS, the U.S. Department of Labor (DOL) has issued a Notice of Proposed Rule Making (NPRM) that considers the implementation and expansion of Industry-Recognized Apprenticeship Programs (IRAPs), and currently, the USDOL has maintained an exemption for the construction sector; and,

WHEREAS, IRAP designation for the construction industry could drive down the training standards for registered apprenticeship programs and significantly lower the threshold of programs eligible for the designation; therefore,

BE IT RESOLVED, the members of PILMA consider the expansion of IRAPs in the construction sector to be detrimental. This designation would severely impair the ability of biopharmaceutical companies to determine the training and skillset of workers constructing their facilities, endangering the safety, quality and efficacy of these buildings and hamper the drive for the discovery of new medications researched and manufactured there; and,

BE IT RESOLVED, that the trade union and company trustees of PILMA oppose any changes to the current IRAP regulations and advocate that the exemption for construction be maintained; and,

BE IT RESOLVED, PILMA commends the Administration for recognizing in the proposed rule on Industry-Recognized Apprenticeship Programs that these new programs have no place in the construction industry. We firmly believe this exemption should be a permanent part of the final rule.