

March 10, 2026

Steve Mandernach, Executive Director
Association of Food and Drug Officials
155 Market Street, 3rd floor
York, PA 17401

Dear Steve,

On behalf of the Alliance of Professional Tattooists (APT), we write to you to express serious ethical and procedural concerns regarding the composition and conduct of the AFDO MoCRA Implementation Working Group (MIWG).

The Alliance of Professional Tattooists was founded with a clear mission that includes and prioritizes promoting advances in tattooing health and safety, and dissemination of that information to professional tattooists. For decades, our organization has worked collaboratively with public health agencies, regulators, manufacturers, physicians, researchers, and practitioners to promote evidence-based standards regarding the public health, education, and professional conduct within our trade.

It is therefore deeply concerning that in a working group tasked with addressing issues directly affecting tattoo practice, the voices of professional tattoo practitioners have not been meaningfully centered.

Tattooing is a skilled profession practiced by individuals with firsthand knowledge of the procedures, materials, client populations, and operational realities that shape safety outcomes. When regulatory discussions occur without substantive representation from those who perform the services in question, the resulting policy risks becoming disconnected from practice realities and therefore less effective.

Public health and safety scholarship consistently demonstrates that regulatory systems achieve better safety outcomes when stakeholders directly involved in implementation are included in policy and operational framework development. Participatory governance is a widely recognized core component of good public health policy because those closest to a practice possess critical operational knowledge necessary to design feasible and enforceable standards.

This principle is well established in literature. We can see this in classic frameworks like Arnstein's work on citizen participation. If you aren't familiar, this framework emphasizes that meaningful stakeholder inclusion is necessary for legitimate governance and sustainable policy outcomes. Similarly modern public health ethics frameworks emphasize policies affecting communities or professional groups should involve those groups in the decision-making process to maintain both legitimacy and effectiveness.



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The current structure of the working group appears to be inconsistent with any reasonably accepted best-practice ethical frameworks.

At present, tattoo practitioner representation appears limited to a single individual who does not represent the professional tattoo community at large. There is real fear that has been expressed that this selection was possibly made due to the agreeability of said individual and them acting in their own interest of professional advancement, not the interest of true trade representation. Meanwhile, longstanding organizations such as the APT have repeatedly expressed willingness to participate and contribute expertise but have not been included in a meaningful capacity.

This raises concerns about transparency and fairness in the selection process used to determine representation within the working group.

The Alliance of Professional Tattooists respectfully requests clarification regarding the following:

1. The criteria used to select members of MIWG
2. The process through which stakeholders were identified and invited to participate
3. The rationale for excluding established professional tattoo organizations that have historically contributed to safety standards and public health initiatives within the trade

Transparency in these processes is critical to maintaining trust between regulatory bodies and the communities affected by their decisions.

Again, good public health emphasizes that regulatory legitimacy depends not only on legal authority, but also on procedural fairness and stakeholder engagement. When regulatory decisions are perceived as being made without meaningful input from those directly affected, the likelihood of compliance and cooperative implementation decreases. We want to see compliance with regulations that legitimately improve the landscape of tattooing. We want to see professional buy-ins, and better safety outcomes. We do not believe that this will happen effectively without adequate trade representation.

It is important to recognize that the APT does not approach the existence of this working group from a position of opposition. Our organization has consistently supported AFDO and the advancement of safe tattooing. We just want the stakeholders of the outcomes of working groups like the MoCRA Implementation Working Group to be represented ethically and fairly. The phrase, "Nothing about us, without us" is commonly used when discussing policy development, and it feels very appropriate here. We remain willing and eager to participate in these discussions and contribute expertise that help strengthen outcomes.

Tattoo regulation should be grounded in science, public health, safety, and practical expertise. Achieving these goals requires positive collaboration. We hope that future stages of this process will reflect a more ethical, transparent, and industry inclusive approach that recognizes the value of stakeholder engagement. We hope you choose to reconsider the current structure of participation **and** would welcome the opportunity to meet with you directly to discuss how APT can meaningfully contribute to this process. We truly look forward to your response.

Sincerely,

The Alliance of Professional Tattooists Board of Directors