



April 13, 2015

The Honorable Bob Goodlatte
Chairman
House of Representatives
Judiciary Committee
Washington, DC 20515

The Honorable John Conyers, Jr.
Ranking member
House of Representatives
Judiciary Committee
Washington, DC 20515

RE: Markup of H.R. 427, the Regulations from the Executive in Need of Scrutiny Act of 2015

Dear Representative:

The Coalition for Sensible Safeguards (CSS), an alliance of over 150 labor, scientific, research, good government, faith, community, health, environmental, and public interest groups, strongly opposes H.R. 427, the Regulations from the Executive in Need of Scrutiny Act of 2015 (REINS Act), which will be considered by this Committee this week.

This bill represents the most radical threat in generations to our government's ability to protect the public from harm. The bill will delay or shut down the implementation of critical new public health and safety safeguards, financial reforms and worker protections, thereby making industry even less accountable to the public. It will only benefit those corporations that wish to game the system and evade safety standards and do nothing to improve protections for the American public.

REINS would require both houses of Congress to approve a major rule, with no alterations, within a 70-day window. If both chambers are unable to approve a major rule, it would not take effect and would be tabled until the next congressional session. In other words, *by doing nothing*, Congress would prevent existing laws from being effectively implemented. It would stop all major rules, including the large number of non-controversial rules agencies produce every year, from going through.

Currently, it takes years for a federal agency to produce the rules necessary to implement and enforce public safeguards and protections. For example, the recently implemented EPA standards on greenhouse gas emissions and fuel economy for light vehicles took years of development – despite being supported by both environmental groups and the auto industry – before federal regulators finally got a rule on the books. REINS would allow congressional inaction to block such common-sense, non-controversial rules.

Congress already has the first and last word when it comes to agency rulemaking, making the REINS Act needless and redundant. Agencies can only exercise authority that has been delegated by Congress in authorizing legislation. Any agency attempt to overstep these bounds is likely to result in judicial scrutiny and reversal of the agency action. And under the Congressional Review

Act, Congress already has the authority to review and nullify a rule by passing a resolution of disapproval. The REINS Act would force Congress to refight its previous debates, wasting time and money and paralyzing agencies and Congress itself.

The REINS Act would inappropriately – but deliberately - inject political considerations into a regulatory process that is supposed to be based on objective agency science and expertise. Federal agencies employ personnel with policy, scientific, and technical expertise to produce smart and sensible regulations. Allowing Congress to have the final say on regulations would give lobbyists, special interest groups, and those who provide legislators with campaign contributions even more influence in shaping a rule.

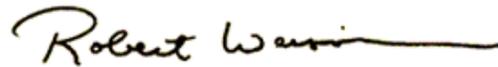
Simply put, the REINS Act would make the dysfunction and obstructionism that plague our political process even worse by giving one chamber of Congress veto power over any new significant public health and safety protection, no matter how non-controversial or sensible it may be.

Congress should be searching for ways to ensure that federal agencies enforce laws designed to protect our food supply, water, air quality, financial security and much more, not throwing up roadblocks to sensible safeguards that protect the American people. This bill should not even merit consideration by this Committee. It should not be reported out.

Sincerely,



Katherine McFate, President and CEO
Center for Effective Government
Co-chair, Coalition for Sensible Safeguards



Robert Weissman, President
Public Citizen
Co-chair, Coalition for Sensible Safeguards

The Coalition for Sensible Safeguards is an alliance of consumer, labor, scientific, research, good government, faith, community, health, environmental, and public interest groups, as well as concerned individuals, joined in the belief that our country's system of regulatory safeguards provides a stable framework that secures our quality of life and paves the way for a sound economy that benefits us all.