

February 28, 2017

Dear President Trump:

We, the undersigned consumer, small business, labor, good government, financial protection, community, health, environmental, civil rights and public interest groups, write in strong opposition to your Jan. 30, 2017 executive order that purports to establish a regulatory budget and to require two regulations to be eliminated for each new one adopted. This sweeping, unlawful and arbitrary directive cannot be justified on any rational grounds. If implemented, its flawed reasoning and vague drafting would leave Americans more vulnerable to financial, safety, health, and environmental hazards.

Americans rely on public safeguards to preserve human health, safety, financial stability, quality of life, and combat discrimination. The benefits of regulations are the reason that we have them. Despite this, your executive order strives to establish a regulatory budget that focuses entirely on the cost of compliance to the exclusion of benefits created or harm avoided.

We all know that pollution-induced disease, contaminated food, unsafe workplaces, and dangerous consumer products inflict real economic and human tolls, just as we know that the shoddy financial practices that caused the Great Recession had devastating economic impacts to consumers and small businesses everywhere. Yet your executive order completely ignores the economic and social benefits that come from preventing such harms. Furthermore, the directive does not even acknowledge that major rules that most benefit the public already undergo thorough cost-benefit analysis. Analyses from administrations of both political parties have consistently found that the net impact of federal regulations is vastly more financial and social benefits than compliance costs.

If implemented, the executive order's "pay-go" provision would set an arbitrary and blanket requirement that two regulations must be repealed for each new one adopted. It is premised on the erroneous notion that most existing protections serve no purpose or that underlying hazards vanish when a protection is revoked. It also fails to account for the enormous due diligence that agencies undertake when the law compels regulatory action. Nothing in the language of the order requires thoughtful evaluation of a rule's merit. In fact, the previous administration - building on prior efforts by administrations of both parties - already instituted a review process that has eliminated many obsolete rules and, if allowed to run its course, would be more than equal to the task of eliminating any obsolete rules that remain. There is no reason to believe there are enough obsolete regulations on the books to sustain the order's draconian requirement for offsetting even the steady flow of basic regulatory actions that American businesses need to keep the pharmaceutical market working or our transportation infrastructure functional.

Americans did not vote to be exposed to more health, safety, environmental and financial dangers, yet this is precisely the effect that your executive order would have, if implemented. Its biased design virtually ensures that critical protections would be abandoned. Its sole focus on compliance costs would also ensure that protections with enormous net benefits would be passed up.

As organizations that protect the public against a broad spectrum of dangers, we strongly oppose this order, and urge its immediate withdrawal.

Thank you,

350 Maine
9to5, National Association of Working Women
AFL-CIO

African American Health Alliance
Alaska Wilderness League
Alliance for Nurses for Healthy Environments
American Association for Justice
American Association of University Women (AAUW)
American Family Voices
American Federation of Teachers
American-Arab Anti-Discrimination Committee
Americans for Financial Reform
Amigos Bravos
And All Her Ways Are Peace
Association of Asian Pacific Community Health Organizations (AAPCHO)
Bend the Arc Jewish Action
Beyond Nuclear
BlueGreen Alliance
Bluestem Communications
Center for Accessible Technology
Center for Biological Diversity
Center for Digital Democracy
Center For Food Safety
Center for Medicare Advocacy, Inc.
Center for Progressive Reform
Center for Responsible Lending
Center for Science in the Public Interest
Citizens' Environmental Coalition
Clean Water Action
ClimateMama
Coalition For A Safe Environment
Coalition on Human Needs
Communications Workers of America
Connecticut Fair Housing Center
Consumer Action
Consumer Federation of America
Consumers for Auto Reliability and Safety
DC Consumer Rights Coalition
Defenders of Wildlife
Earthjustice
Earthworks
Ecology Center
Economic Policy Institute
Endangered Habitats League
Endangered Species Coalition
Environmental Defense Fund
Environmental Integrity Project
Environmental Working Group
Equal Justice Society
Family Equality Council
Food & Water Watch
Free Press
Friends of the Earth
Gasp

Global Witness
GreenLatinos
Health Professionals and Allied Employees, AFT/AFL-CIO
Human Rights Campaign
Institute for Agriculture and Trade Policy
Institute for Science and Human Values
International Center for Technology Assessment
International Fund for Animal Welfare (IFAW)
Iowa Environmental Council
Jean-Michel Cousteau's Ocean Futures Society
Labadie Environmental Organization (LEO)
Labor & Employment Committee of National Lawyers Guild
Lake Champlain Committee
League of Conservation Voters
League of Women Voters of the United States
Legal Aid at Work (formerly Legal Aid Society-Employment Law Center)
Louisiana Environmental Action Network
Lower Mississippi River Foundation
Lower Mississippi Riverkeeper
Main Street Alliance
MassCOSH (Massachusetts Coalition for Occupational Safety & Health)
Milwaukee Riverkeeper
Mississippi River Network
Mobile Law Center
NAACP
National Association for College Admission Counseling
National Association of Consumer Advocates
National Center for Law and Economic Justice
National Center for Lesbian Rights
National Center for Transgender Equality
National Consumer Law Center (on behalf of its low income clients)
National Consumers League
National Education Association
National Employment Law Project
National Employment Lawyers Association
National Health Law Program
National Law Center on Homelessness & Poverty
National LGBTQ Task Force
National Organization for Women
National Parks Conservation Association
National Partnership for Women & Families
National Women's Law Center
Natural Resources Defense Council
NETWORK Lobby for Catholic Social Justice
New York Lawyers for the Public Interest
Northwest Consumer Law Center
Occupational Health Clinical Centers
Occupational Safety & Health Law Project
Ocean Conservancy
Ohio Citizen Action
OVEC-Ohio Valley Environmental Coalition

Pesticide Action Network
Prairie Rivers Network
Progressive Congress Action Fund
Public Citizen
Public Justice Center
Public Knowledge
Puget Soundkeeper Alliance
Racial and Ethnic Health Disparities Coalition
Sargent Shriver National Center on Poverty Law
Sierra Club
SouthWings
Sugar Law Center for Economic & Social Justice
Tennessee Clean Water Network
The Leadership Conference on Civil and Human Rights
The Trevor Project
The Voter Participation Center
The Wilderness Society
Turtle Island Restoration Network
U.S. PIRG
Union of Concerned Scientists
Unitarian Universalist Congregation of Princeton NJ
United Church of Christ, OC Inc.
United Steelworkers
Utah Physicians for a Healthy Environment
Voices for Progress
Western Watersheds Project
Women's Voices for the Earth
Women's Voices Women Vote Action Fund
Woodstock Institute
Workers' Center of Central New York
Worksafe
Young Progressives Demanding Action