



AMERICAN PUBLIC HEALTH ASSOCIATION

*For science. For action. For health.*

January 3, 2017

U.S. House of Representatives  
Washington, DC 20515

Dear Representative:

On behalf of the American Public Health Association, a diverse community of public health professionals who champion the health of all people and communities, I write in strong opposition to the Regulations from the Executive in Need of Scrutiny (REINS) Act and the Midnight Rules Relief Act. These ill-conceived bills would allow Congress to ignore scientific evidence and permanently block or delay important health and safety regulations intended to improve the health of the American public.

The REINS Act would require congressional approval of all new major rules, without any changes, within 70 days. Failure to approve the rule within the time limit would prevent the rule from taking effect. Most rulemaking is directly tied to legislation already enacted by Congress, so this legislation would essentially give Congress veto power over laws enacted in the past without members of Congress having to cast a single vote to repeal those laws. For example, this bill would allow Congress to block important rules under the Clean Air Act that protect the public's health from dangerous air pollution. A rigorous, peer reviewed analysis, *The Benefits and Costs of the Clean Air Act from 1990 to 2020*, conducted by the U.S. Environmental Protection Agency, found that the air quality improvements under the Clean Air Act will save \$2 trillion by 2020 and prevent at least 230,000 deaths annually. The REINS Act would also allow Congress to block other future major public health rules including those intended to protect the nation's food supply, ensure worker safety and protect the public from toxic substances.

The Midnight Rules Relief Act would also threaten public health by allowing Congress to use the Congressional Review Act to disapprove multiple rules finalized near the end of a presidential term at once. The bill falsely assumes that regulations finalized toward the end of an administration have been rushed through the regulatory process, when in fact, regardless of when a rule is finalized, it has likely been in the regulatory process for a number of years, with multiple opportunities for public input along the way. Important rules intended to protect the public's health and safety could all be at risk. Congress recently used the CRA to try to overturn the Clean Power Plan which will reduce deadly air pollution from power plants and greenhouse gas emissions that contribute to climate change. Expanding the use of the CRA to disapprove multiple rules at once would significantly undermine efforts to protect the public from serious health threats.

Protecting the health of American families is one of the most basic responsibilities of government, including members of Congress. The REINS Act and the Midnight Rules Relief Act would not only create roadblocks to our ability to move forward in protecting public health, but would also unravel years of progress. We urge you to stand up for the health of American families and oppose these bills.

Sincerely,

A handwritten signature in black ink, reading "Georges C. Benjamin". The signature is written in a cursive style with a large, prominent "G" at the beginning.

Georges C. Benjamin, MD  
Executive Director