



**Pennsylvania Manufacturers' Association**

July 23, 2020

Administrator Andrew Wheeler  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington D.C. 20460

**Attn: Doc. No. EPA-HQ-OAR-2020-00044**

Re: Comments in support of EPA's Notice of Proposed Rulemaking, "Increasing Consistency and Transparency in Considering Benefits and Costs in the Clean Air Act Rulemaking Process," 85 Fed. Reg. 35612 (June 11, 2020)

Dear Administrator Wheeler:

The Pennsylvania Manufacturers' Association supports the proposal to include cost-benefit analysis in the Department of Environmental Protection (EPA) rulemaking process. Founded in 1909 by Bucks County industrialist Joseph R. Grundy, the Pennsylvania Manufacturers' Association is the nonprofit, statewide trade organization representing the manufacturing sector, it's 570,000 employees on the plant floor, millions of additional jobs in supporting industries, and more than \$93 billion in gross state product in Pennsylvania's public policy process.

Pennsylvania's business community recognizes that without a healthy and sustainable natural environment it is difficult to maintain and attract high quality employees. However, it is equally important to ensure that environmental regulation is approached on sound scientific evidence to ensure that regulations are reasonable and within technological limits. It is likewise prudent that these regulations actually achieve real environmental benefits and do not advantage one sector of the economy to the detriment of another while acknowledging and quantifying all economic impacts.

We understand that the changes being proposed by the EPA are not intended to deregulate or diminish regulatory authority, but will instead instill uniformity in the assessment of the impact of proposed regulations on those the regulations will impact. Conservative estimates portray that EPA regulations account for nearly 70 percent of the costs of all significant federal regulations, with Clean Air Act (CAA) regulations being the largest component of the EPA's oversight authority. In addition to the high cost, Clean Air Act regulations affect almost every aspect of manufacturing in this country. They can dictate whether, when, and where plants get built and which products are produced.

For the American consumer, EPA regulations can also affect the price and availability of goods ranging from essential energy sources and transportation fuels, to consumer goods and essential products such as sterilizers, even the food we eat. Regulations in general accrue significant costs on households from the costs that regulations impose on businesses, which are then passed down to the consumer. The U.S.

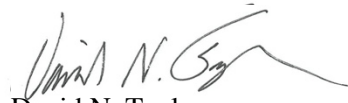
Chamber of Commerce estimates that federal regulations cost the American economy as much as \$1.9 trillion a year in direct costs, lost productivity, and higher prices.

Ensuring agencies like the EPA approach new rulemaking with prudence is paramount. Now more than ever we need a resurgence of American-made manufacturing to bolster our economy, but also to reduce the reliance of needed goods in the American marketplace by foreign adversaries. We ought to make it the smart business decision to locate, hire, and expand here in the United States than abroad. Approaching regulations in a uniform, transparent, and predictable way will surely enhance the public good that is compliance with future rulemaking.

We should want industrial activity to happen here in the United States than elsewhere in the world. We benefit from the jobs and the economic activity, but we also benefit from the fact that the United States has some of the strictest regulations when it comes to emissions standards, water quality, and mineral extraction. From an environmental standpoint, it's better that this activity happens here, where companies are good stewards of the environment and there is strict oversight, rather than in Russia where environmental regulations are skirted, or China where there are serious human rights violations, worker exploitation, and heavy pollution.

Manufacturers do not fear regulators that act as a partner in compliance and rulemaking that is uniform, transparent, and predictable. Thank you for proposing rules to increase consistency and transparency in considering benefits and costs in the Clean Air Act rulemaking process. We, the Pennsylvania Manufacturers' Association, support this proposal.

Respectfully submitted,



David N. Taylor  
President & CEO



Carl A. Marrara  
Vice President of Government Affairs

*SUBMITTED ELECTRONICALLY*