



JIM DOYLE
GOVERNOR
STATE OF WISCONSIN

December 17, 2003

TO THE HONORABLE MEMBERS OF THE ASSEMBLY:

I am vetoing Assembly Bill 267 in its entirety. I am committed to implementing by the end of the year the most aggressive regulatory reform effort in the Midwest - regulatory reform that makes the system work faster and more efficiently without compromising critical public safety or environmental protections.

Unfortunately, Assembly Bill 267 will accomplish neither goal. This legislation will slow down the administrative rule process and provides broad immunity for criminal and civil violations of public safety and environmental laws. AB 267 contains provisions that simply go too far and jeopardize the public health and safety, and our natural resources.

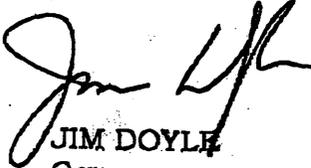
I support regulatory reform for all businesses in our state - small and large. We need to speed up the permit review processes, reduce duplication, and provide the public and the regulated community with more consistency and clear decisions. I support several of the concepts incorporated in this legislation, including efforts to encourage more active participation in the administrative rulemaking process by both small businesses and the public and to help small businesses voluntarily address and correct possible violations of public safety regulations.

However, this legislation creates a broad loophole to prevent prosecution for both civil and criminal violations. AB 267 provides immunity for criminal and civil violations if the violation is self-reported within 45 days of its discovery, and provides no concrete timeframe for correcting the violation. This loophole is substantially broader than that in legislation I vetoed earlier this month and would likely eliminate our ability to effectively enforce child labor, public safety, and environmental laws.

This proposal also creates a powerful new, non-elected Small Business Regulatory Review Board. The Board's wide-ranging mandate will result in longer administrative rulemaking processes, and gives the Board broad powers to delay administrative rulemaking proposals. And finally, at the same time we are committed to reducing the size of the state work force, this proposal imposes large and potentially costly additional workloads on agencies undergoing staff and budget cuts.

My administration is committed to working with the legislature to develop compromise legislation that will maintain critical public safety standards, encourage voluntary compliance for small businesses and speed up the regulatory process. I am encouraged that the legislature has worked with my administration to correct many of the AB 267 flaws in companion legislation, Senate Bill 100, which is still in the state Senate. I encourage the legislature to continue its efforts to pass that bill as appropriately amended.

Respectfully submitted,



JIM DOYLE
Governor