

Committee on Energy and Commerce
U.S. House of Representatives
Witness Disclosure Requirement - "Truth in Testimony"
Required by House Rule XI, Clause 2(g)(5)

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| 1. Your Name: Paul Noe | | |
| 2. Your Title: Vice President Public Policy | | |
| 3. The Entity(ies) You are Representing: American Forest & Paper Association and American Wood Council | | |
| 4. Are you testifying on behalf of the Federal, or a State or local government entity? | Yes | No X |
| 5. Please list any Federal grants or contracts, or contracts or payments originating with a foreign government, that you or the entity(ies) you represent have received on or after January 1, 2015. Only grants, contracts, or payments related to the subject matter of the hearing must be listed. | | |
| 6. Please attach your curriculum vitae to your completed disclosure form. | | |

Signature: _____



Date: February 12, 2018

PAUL R. NOE
Curriculum Vitae

EXPERIENCE

American Forest & Paper Association
Vice President of Public Policy

2008-Present

- Guide development of policy, strategies, research, and legal, policy and technical advocacy positions through CEO task forces.
- Manage and help lead association advocacy on wide range of issues, including environmental regulation, chemicals and product stewardship, TSCA reform, regulatory reform, clean air, climate change, energy, clean water, solid waste, risk assessment, sustainability, workplace health and safety, European biomass subsidies, international trade, and environmentally preferable procurement.
- Draft regulatory proposals, bills, regulatory comments, testimony, and articles.
- Develop legal positions to support advocacy, such as necessity of legislative rules versus guidance, legal discretion to reinterpret statutes to implement a cost-benefit decisional rule, and legal authority for EPA to recognize the biogenic carbon cycle.
- Provide leadership on need for and design of key research, including on health effects of particulate matter and ozone, economic and job impacts of regulations, carbon neutrality of forest products manufacturing residuals, market-distorting impacts of European biomass subsidies, and potential economic and jobs tradeoffs from renewable energy legislation.
- Serve as industry spokesman before regulators, legislators, environmental and labor groups, media, academia, allied trade associations, and other stakeholders.

Grocery Manufacturers Association
Vice President of Regulatory Affairs

2007-08

- Provided strategic vision, leadership and advocacy for the consumer packaged goods industry, particularly consumer products, on emerging regulatory, legislative, legal and technical issues, including green chemistry, environmentally preferable procurement, dormant commerce clause legal challenge, and a wide range of environmental issues at the federal and state level.
- Coordinated and helped lead advocacy efforts of allied trade associations on green chemistry, environmentally preferable procurement, and other environmental issues through Consumer Products Forum, including drafting bills and comments.
- Managed and led environmental sustainability initiative for the consumer packaged goods industry, focusing on energy efficiency, climate change, water conservation, and packaging, including outreach to environmental organizations, government, academia, customers, and other stakeholders.
- Coordinated and managed association staff on environmental and emerging contaminants issues.

C&M Capitolink and Crowell & Moring

2006-07

Partner and Counsel

- Provided policy and legal advocacy and counseling on the environment, chemicals and pesticides regulation, risk assessment, agriculture, biotechnology, clean air, antitrust, administrative law, and climate change.

Office of Management & Budget, Office of Information & Regulatory Affairs 2001-06

Counselor to the Administrator

- Oversaw Administration regulatory policy on environment, agriculture, energy, natural resources, food and drugs, biotechnology, and nanotechnology.
- Led interagency reviews of draft regulations and regulatory impact analyses from EPA, USDA, DOI, DOC, FDA, and DOE.
- Advised OIRA Administrator on sensitive legal, political and policy matters.
- Served as liaison on regulatory and legislative issues with White House offices and agencies.
- Drafted and managed implementation of government-wide guidelines on good guidance practices, information quality, peer review, and risk assessment. Assisted drafting of Executive orders on regulatory policy.
- Managed drafting of regulatory comments, Congressional testimony, correspondence and press releases.
- Numerous speeches on Administration initiatives.

Senate Committee on Governmental Affairs

1995-2001

Senior Counsel

- Served under Chairmen Fred Thompson, Ted Stevens and Bill Roth.
- Major responsibilities included: regulatory reform, risk assessment, environmental law, climate change, energy policy, administrative law, agency oversight, privacy, federalism, property rights, paperwork reduction, and Judiciary Committee issues.
- Lead counsel on numerous legislative and oversight initiatives: drafted and negotiated bills, planned and supported hearings and markups, and wrote committee reports.
- Created and managed oversight and research agenda for committee through Government Accountability Office and Library of Congress.
- Key legislation included: "Regulatory Improvement Act of 1999" (S. 746); "Regulatory Right-to-Know Act" (enacted 2000); "Truth in Regulating Act" (enacted 2000); "Privacy Commission Act of 2000" (S. 1214), "Congressional Review Act" (enacted 1996); "Small Business Regulatory Enforcement Fairness Act" (enacted 1996); "Administrative Dispute Resolution Act" (enacted 1996); "Negotiated Rulemaking Act" (enacted 1996); "Regulatory Reform Act of 1995" (S. 291); "Comprehensive Regulatory Reform Act of 1995" (S. 343); "Regulatory Transition Act of 1995" (S. 219).
- Numerous speeches and conferences on committee issues.

Ropes & Gray, Washington, DC 1992-94

Associate

- Staffed CEO regulatory reform task force and drafted white paper, “Toward Smarter Regulation,” for The Business Roundtable.
- Supported lobbying activities before the White House and Congress.
- Counseled clients on environmental regulations, corporate compliance programs, and emerging legal developments.
- Prepared legal memoranda, briefs and public comments, and participated in rulemakings.

Skadden, Arps, Slate, Meagher & Flom, Washington, DC 1989-90; 1991-92

Associate; Law Clerk; Summer Associate

- Prepared memoranda of law and briefs and advised clients on numerous issues in litigation and environmental compliance counseling.
- Assisted partner on Advisory Group to U.S. Sentencing Commission to draft sentencing guidelines for environmental crimes.

Wickens, Koches, & Cale, Washington, DC 1988-89

Law Clerk; Summer Associate

Department of Justice, Environmental Enforcement Section, Washington, DC 1987-88
Paralegal Specialist

Department of Energy, Office of Hearings and Appeals, Washington, DC 1985-87
Exceptions and Appeals Analyst

FEDERAL CLERKSHIP

The Honorable Charles R. Richey, United States District Court, Washington, DC 1990-91
Law Clerk

EDUCATION

Georgetown University Law Center 1990

Juris Doctor, *cum laude*

Honors: John M. Olin Fellow in Law & Economics.

Law Review: *The Georgetown Law Journal*, Associate Editor.

Publications: Contributing Author, The Criminal Procedure Project, 77 Geo. L.J. 1 (1989).

Williams College 1985

Bachelor of Arts, *magna cum laude*

Honors: Arthur C. Kaufmann English prize; Phi Beta Kappa; English honors.

Major: English, concentration in Economics.
Activities: Williams Rugby Football Club.

U.S. Chamber of Commerce, Institute for Organization Management 2014
Certificate in Non-Profit Organization Management

Harvard School of Public Health, Harvard Center for Risk Analysis 2000
Analyzing Risk: Principles, Concepts, Applications

PROFESSIONAL ACTIVITIES

Policy Fellow, University of Pennsylvania Law School (Spring 2016) (provided lectures in environmental law, advanced regulatory policy, administrative law, and legislation).
Co-Chair, Committee on Legislation, American Bar Association, Section of Administrative Law and Regulatory Practice (2012-Present).
Council Member, American Bar Association, Section of Administrative Law and Regulatory Practice (2007-2010).
Co-Chair, Committee on Rulemaking, American Bar Association, Section of Administrative Law and Regulatory Practice (2007-2011).
District of Columbia Bar.

RECENT SELECT PUBLICATIONS AND PRESENTATIONS

* Co-author, “Beyond Process Excellence: Enhancing Societal Well-Being,” in Achieving Regulatory Excellence, Brookings Institution Press, Washington, DC (2017) (recommending a statutory cost-benefit decisional rule for regulation in the U.S. and around the world).
* Co-chair, “Improving the Administrative Process: A Report to the President-Elect,” American Bar Association, Section of Administrative Law and Regulatory Practice (Oct. 2016) (submitted to the Trump and Clinton transition teams; lead author of recommendations on stronger cost-benefit analysis, scientifically sound risk assessment, presidential oversight of independent regulatory commissions, regulatory budget, strengthening OMB’s regulatory review office, and OMB review of guidance documents).
* Author, “Smarter Regulation for the American Manufacturing Economy,” presented at Indiana University conference, “What the Next President Should Do About U.S. Manufacturing: An Agenda for the First 100 Days,” National Press Club, Washington, DC (Sept. 14, 2016) (submitted to Trump and Clinton transition teams; provides key regulatory reform recommendations to revive U.S. manufacturing sector).
* Lead author, “A Paradigm Shift in the Cost-Benefit State,” University of Pennsylvania Law School RegBlog (April 24, 2016) (proposing a presidential executive order to direct agencies to revise their statutory interpretations to fully implement a cost-benefit decisional rule).

- * Organizer and panel moderator, “The Future of the Cost-Benefit State,” American Bar Association, Section of Administrative Law and Regulatory Practice, Annual Meeting, Washington Convention Center (Dec. 8, 2016).
- * Speaker, Regulatory Reform Roundtable, sponsored by the American Council for Capital Formation, Dirksen Senate Office Building (Nov. 16, 2016).
- * Speaker, panel discussion, “Cost-Benefit Analysis and the Courts,” a conference sponsored by the George Washington University, the Society for Benefit-Cost Analysis, and the American Bar Association Section of Administrative Law and Regulatory Practice (Oct. 11, 2016).
- * Witness, Hearing on “Examining the Use of Agency Guidance, Part II,” U.S. Senate Subcommittee on Regulatory Affairs and Federal Management (June 30, 2016).
- * Speaker, panel on “The Next Five Years in Administrative Law,” University of Pennsylvania Law School (April 2016).
- * Speaker, Webinar on “The State of the Information Quality Act,” American Bar Association Section of Administrative Law and Regulatory Practice (Feb. 26, 2016).
- * Speaker, “Science and Federal Regulation: Is the Office of Management and Budget an Effective Gatekeeper?” Washington Legal Foundation (May 19, 2015).
- * Author, “Considering the Impacts of Regulations on Jobs: Toward Sustainable Regulation,” 38 Admin. Law & Reg. News (Fall 2012).
- * Lead author, “Due Process and Management for Guidance Documents: Good Governance Long Overdue,” 25 Yale J. on Reg. 103 (Winter 2008).