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Suppliers Partnership for the Environment (SP) Washington, DC, United States

Dear JPAC Members,

On behalf of the members of the Suppliers Partnership for the Environment (SP) (www.supplierspartnership.org), an innovative collaboration of leading automobile OEM's, and large and small auto suppliers from the complete spectrum of the automobile supply chain, I would like to thank the Joint Public Advisory Committee (JPAC) for the opportunity to provide comments on the CEC's strategic plan.

SP has been a long time supporter and participant in CEC's activities relating to environmental issues and opportunities in the automobile supply chain. Two of the specific trilateral environmental priorities included in the CEC final draft strategic plan have particular relevance, interest and opportunity for CEC and SP to work collaboratively to improve environmental protection that integrates ecological, economic and social factors affecting the North American environment.

The first relates to the Healthy Communities and Ecosystems priority that relates to an "enhanced regional approach to sound management of chemicals." This objective highlights the need for CEC to establish compatible approaches for identifying and tracking chemicals in commerce in North America and implementing risk reduction strategies to reduce the exposure of North Americans and their environments to chemicals of mutual concern.

On June 24, 2009, SP members made a presentation during the CEC's Sixteenth Regular Council Meeting addressing ways that the three countries within CEC could work collaboratively to support a Materials Assessment Strategy (MAS) Program that would enable innovations in automotive products through a common chemical assessment and management strategy in North America1. In those comments, SP respectfully recommended that CEC support and coordinate with SP an effort to provide a web-based, automated chemical assessment solution to all automotive original equipment manufacturers and their suppliers in North America for two years. Such a solution, if accepted by the CEC, could serve as a pilot project on which other sector based initiatives could be initiated to address chemicals in a wide array of manufactured products. (1 See Attachments A and B)

The second relates to Greening the Economy of North America. The strategic plan has direct and immediate opportunities for the members of SP to work collaboratively with CEC because of the importance of the North American Automobile Industry, and SP's broad based membership and the focus that SP has on the sharing of best practices and

technological innovations. SP's membership also includes a wide range of small and medium size enterprises that are directly engaged in the supply chain of major automotive manufacturers. SP has also recently created a new Energy and Water Utility Managers Forum that is designed to provide individuals having responsibility for energy and water issues across the automotive supply chain an opportunity to benchmark, work together and learn from each other about energy efficiency and carbon reduction and water sustainability activities and good practices. SP strongly supports and urges action to implement work that will, as included in the CEC strategic plan, "build on our successes in the automotive manufacturing sector through continued efforts to green critical components of supply chains across the continent and support ongoing recovery of this important sector."

In 2009, members of the Suppliers Partnership for the Environment (SP), including GM, Ford and Chrysler, were key participants in a project of CEC and contributed to the initial draft of a North American Automotive Industry Sustainability Roadmap. The draft Roadmap, "Creating Economic Opportunities through Environmental Technologies and Innovations for the North American Automotive Industry: A Roadmap", outlined five key opportunities for the North American Automotive Industry:

- 1. Accelerating the greening of automotive products in North America through automotive chemical innovation.
- 2. Creating systems to identify and utilize automotive manufacturing environmental technology opportunities to improve the environment and the financial viability of the automobile supply chain.
- 3. Enhancing the automotive industry and its supply chain by reducing energy consumption and the impact of the automobile supply chain on the global environment.
- 4. Addressing water sustainability dilemmas, challenges and opportunities facing the automotive industry and its supply chain.
- 5. Creating processes and systems that will support North American Resource Management programs within the automobile supply chain.

In addition to the completion of the draft Roadmap, several key objectives were reached including engaging core auto manufacturers and suppliers in the US, Mexico and Canada, opening a trilateral dialogue and increasing the exchange of tools and resources for greening the North American automotive supply chain. Yet, significant opportunities remain to continue to encourage buy-in from manufacturers, build connections, perform training and help implement a partnership to support the greening of the auto supply chain in North America and begin to address the opportunities identified in the Roadmap.

As noted in Eastern Research Group's (ERG) Report on the Accomplishments of the CEC Under the 2005–2010 Strategic Plan, "The North American auto industry is undergoing one of the most profound restructurings of its history. There are significant opportunities to encourage the future industry to take advantage of the greenest alternatives and innovations along the entire supply chain." As proposed in CEC's draft Strategic Plan, we would encourage the JPAC to build on CEC's successes in the automotive manufacturing sector, through continued efforts to green critical components of supply chains across the continent and support the ongoing recovery of this important sector.

We believe that the five key opportunities identified through the automotive sector roadmap initiative are aligned with CEC's environmental priority of "Greening the Economy in North America" and strategicobjective of "improving private sector environmental performance in North America." We encourage the JPAC to urge the CEC to build on the good work CEC has begun and continue to support the effort to Green the North American Automotive Supply Chain within the next five years.

In conclusion, SP would respectfully recommend that JPAC include in their recommendation to the CEC, that CEC support and coordinate with SP to create a pilot project to provide a web-based, automated chemical assessment solution to all automotive original equipment manufacturers and their suppliers in North America for two years.

We also respectfully encourage JPAC to recommend that CEC continue to build on the good work it has already initiated in the North American auto industry and its supply chain to identify specific projects and activities in the five key opportunities identified in the draft document that SP helped develop, "Creating Economic Opportunities through Environmental Technologies and Innovations for the North American Automotive Industry: A Roadmap" that can help Green the Economy in North America.

SP appreciates the opportunity that JPAC has provided to comment on CEC's Strategic Plan and looks forward to working with JPAC and CEC in the future to, as CEC has described it, "enhance the North American environment for the benefit of present and future generations."