

Alliance of Automobile Manufacturers

Please find our thoughts below on the draft scope for AA guidance.

Alternative Assessment Stakeholder Scoping Questions:

1. What are your three main observations with the continuum process proposed by Ecology?
 - a) Engaging stakeholders throughout the process of developing the guidance document
 - b) Consideration of risk factors associated with potential alternatives, such as cost, performance, commercial availability, etc.
 - c) Consideration of life-cycle analysis
2. Has Ecology omitted any technical concerns as important components of the guidance continuum? **There is no mention of the quality of data utilized.**
3. What are some of the positives this process might bring? **A reduction of COCs that pose hazards to human health or the environment in various industries.**
4. Do you have any other concerns with the proposed process?
 - a) Stakeholders need to be specifically defined. The term is used too broadly in the scope.
 - b) The first objective only states to "Assist in the removal of toxic chemicals of concern from products." with no mention that the removal of the COCs should be in concentrations that present exposure hazards.
 - c) I also did not see language stating whether of concentrations considered are based on entire product or component.
5. Do you agree that the continuum approach is the best way to approach the various needs of an alternative assessment? **Not until more details are provided, such as who are considered the stakeholders, concentrations and exposure hazards considered, concentrations in product vs. components, etc.**
6. Given aggressive timeline, which of the components listed above are most important to be tackled first? **Ensuring that the assessment is based on sound data for COCs that are not only present in certain concentrations, but in those concentrations that actually pose a hazard.**
7. The stakeholder group will have the opportunity to provide additional input once the draft guidance framework has been formed, midpoint and before the guidance is finalized. Do you have any additional input before the states begin discussing the guidance document? **No**

Alliance of Automobile Manufacturers Cont.

Attached please find additional comments:

Alternative Assessment Stakeholder Scoping Questions:

1. What are your three main observations with the continuum process proposed by Ecology?
 - a) Engaging stakeholders throughout the process of developing the guidance document
 - b) Consideration of risk factors associated with potential alternatives, such as cost, performance, commercial availability, etc.
 - c) Consideration of life-cycle analysis
 - d) Is WA State endorsing certain tools such as QCAT and GreenScreen?
2. Has Ecology omitted any technical concerns as important components of the guidance continuum? There is no mention of the quality of data utilized. How will the different components (cost effectiveness, commercial availability, hazard data, etc.) be prioritized along the process?
3. What are some of the positives this process might bring? A reduction of COCs that pose hazards to human health or the environment in various industries. Better informed decision in product design.
4. Do you have any other concerns with the proposed process?
 - a) Stakeholders need to be specifically defined. The term is used too broadly in the scope.
 - b) The first objective only states to "Assist in the removal of toxic chemicals of concern from products." with no mention that the removal of the COCs should be in concentrations that present exposure hazards.
 - c) No language stating whether concentrations considered are based on entire product or component.
5. Do you agree that the continuum approach is the best way to approach the various needs of an alternative assessment? Not until more details are provided, such as who are considered the stakeholders, concentrations and exposure hazards considered concentrations in product vs. components, etc. Conceptually – the flexibility a continuum approach provides is ideal, however, more specific information on the approach is needed before we can claim it to be the “best” approach.

6. Given aggressive timeline, which of the components listed above are most important to be tackled first? Ensuring that the assessment is based on sound data for COCs that are not only present in certain concentrations, but in those concentrations that actually pose a hazard.

Exposure concerns including a full risk assessment, performance considerations, commercial availability and cost, and hazard data.

7. The stakeholder group will have the opportunity to provide additional input once the draft guidance framework has been formed, midpoint and before the guidance is finalized. Do you have any additional input before the states begin discussing the guidance document? No.

Filipa Rio,
Senior Manager, Environmental Affairs
Alliance of Automobile Manufacturers