The Honorable Andrew Wheeler  
Acting Administrator  
Environmental Protection Agency  
EPA Docket Center  
Air and Radiation Docket  
Mailcode 28221T  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

The Honorable Heidi King  
Administrator  
National Highway Traffic Safety Administration  
Docket Management Facility, M-30  
U.S. Department of Transportation  
West Building, Ground Floor, Rm. W12-140  
1200 New Jersey Ave, SE  
Washington, DC 20590

**EPA and NHTSA Public Hearing in Dearborn, Michigan**


My name is Gina Oliver. I am the Senior Director of the Automotive Team for the American Chemistry Council’s Plastics Division, which represents U.S. companies that manufacture the plastics used in lightweight plastic and polymer composite auto parts. The automotive industry is a growing end-use customer market for chemistry. In 2017, automobiles manufactured in North America included approximately $7.0 billion worth of lightweight plastic and composite parts, or $416 per vehicle manufactured. This growth is due to the unique characteristics of plastic and polymer composites to improve safety, reduce mass, enhance aerodynamics, optimize design flexibility, and enable electric and autonomous vehicles.
ACC applauds the Agencies for their efforts to create a harmonized, sustainable, and safe passenger vehicle platform in the United States. However, conclusory statements in the NPRM that “the relatively cost-effective technology option of vehicle lightweighting…will increase on-road fatalities”\(^1\) contradict NHTSA’s own research. In two NHTSA studies from 2012\(^2\) and 2017\(^3\), researchers concluded that plastics and composites offer considerable weight savings in the vehicle and satisfy safety performance requirements. At the 2013 NHTSA Workshop on Mass-Size-Safety, the Insurance Institute for Highway Safety, or IIHS, concluded that advanced structural engineering and technology innovations have improved occupant protection across all vehicles.\(^4\)

Further, the NPRM claims that heavier and larger vehicles are safer while lighter and smaller vehicles are less safe according to historical data. However, more recent studies have shown that improved vehicle design has allowed lightweighting to both enhance safety and reduce vehicle mass because readily available safety equipment acts in synergy with vehicle mass reduction to maintain and improve safety.

If the final rule maintains conclusions that vehicle lightweighting will increase on-road fatalities, that would run counter to the Department of Transportation’s efforts to encourage the development of driver assistance and fully autonomous vehicles. The innovative capabilities of lightweight plastic and polymer composites enable autonomy through their high strength-to-weight ratio, design flexibility, and optimized component integration.

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ACC supports the Agencies’ recognition of lightweight plastic and polymer composite technologies, as a compliance tool for auto manufacturers to make vehicles more fuel efficient. We respectfully request that the Final Rule reflect the latest science by NHTSA and the private sector on the safety of vehicle lightweighting. Please contact ACC with any questions.

Thank you.

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