

Public Comments

on Behalf of the Aluminum Association's Aluminum Transportation Group (ATG)

Submitted by Craig Lewis, sales and marketing director for automotive rolled products, North America, Constellium and technical committee member, ATG to the Environmental Protection Agency Science Advisory Board (SAB)

Regarding the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule

Agency/Docket Number: FRL-FRL-10003-68-OA

1/17/2020

Good afternoon. My name is Craig Lewis, automotive sales and marketing director for Constellium, a leading aluminum supplier to the automobile industry in North America and I'm speaking on behalf of the Aluminum Association's Transportation Group. The Association's member companies support more than 713,000 good U.S. manufacturing jobs and deliver high quality aluminum products to improve the sustainability, safety and performance of new cars and trucks.

The aluminum industry supports a data-driven evaluation of the augural CAFE/GHG emissions standards. However, the aluminum industry believes numerous flawed assumptions in the draft SAFE rule clearly overstate potential unfavorable impacts on safety and cost of the regulation and new vehicle sales. This is in direct contrast to the agencies' recognition of the existing body of peer-reviewed research and on-the-road examples that confirm mass reduction using stronger, less dense materials helps design safe, fuel efficient and cost-effective vehicles.

Our written comments on the draft rule document these flawed assumptions, but I will highlight one example today. The draft rule assumes automakers will reduce weight evenly across vehicle segments, including the smallest passenger cars—that's not an accurate representation of real-world experience. Thanks, in part, to NHTSA's footprint-based CAFE formula—which we continue to fully support— automakers direct their mass reduction strategies primarily where they get the biggest results to boost fuel economy: their larger, heavier cars, trucks and SUV's. The reality is... F-150s...not Chevy Sparks...are getting lighter. As those larger trucks and cars get lighter, they also get more fuel efficient and even safer. And by removing mass from larger vehicles, automakers are able to reduce the weight delta between the heaviest and lightest vehicles on the road, actually improving fleetwide safety.

The top-selling, latest generation F-150 upgraded from steel to aluminum and dropped nearly 750 pounds, delivering segment leading fuel economy along with a 5-star NHTSA crash rating— up from 4-stars for its heavier predecessor. And the Automotive Science Group reports the

aluminum-bodied F-150 holds the smallest life-cycle carbon footprint of any full-size truck in the North American market today. That's how smart lightweighting is working in the real-world and suggestions to the contrary – especially in a regulatory context – are misguided.

In closing, aluminum is proven to help make cars, trucks and SUVs, lighter, safer, greener and better. The final SAFE rule should be fact-driven to reflect the NHTSA's own safety data, historical trends and widely accepted projections to accurately consider how and where automakers are reducing weight.

On behalf of the Aluminum Transportation Group, we thank you for your time and your important work.

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