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Submitted electronically to osd.pentagon.ousd-atl.mbx.cmrmp@mail.mil

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RE: Chemical and Material Risk Management Program (CMRMP) Toxic Substances Control Act (TSCA) Market Analysis, Notice ID DODCMRMP05272025

To Whom It May Concern:

The Alliance for Automotive Innovation (Auto Innovators)¹ appreciates the opportunity to provide comments on the Department of Defense (DoD) Request for Information (RFI) regarding the Chemical and Material Risk Management Program (CMRMP) Toxic Substances Control Act (TSCA) Market Analysis.² Auto Innovators represents the auto manufacturing sector, including automakers that produce and sell more than 90% of the new light-duty vehicles in the United States. Our mission is to work with policymakers to realize a future of cleaner, safer, and smarter personal transportation and to work together on policies that further these goals, increase U.S. competitiveness, and ensure sustainable, well-paying jobs for citizens throughout the country.

We understand that this RFI is issued with the intent to gather information to identify and assess critical applications for the DoD and the defense industrial base (DIB) that necessitate the use of existing chemicals undergoing the U.S. Environmental Protection Agency's (EPA) TSCA section 6 risk evaluation process. Many automotive technologies have dual-use applications; for example, advanced electronics (e.g., sensors, control systems) used in autonomous vehicles are also applicable in drones and military robotics. Battery and electric vehicle technologies are also relevant for military electrification efforts.

Many of the chemicals identified in the initial list of 11 identified in the RFI are also used in the automotive sector and have uses that are critical to designing, manufacturing and servicing the vehicles that Auto Innovators' members provide to consumers worldwide. These chemicals are critical to the integrity and safety of our vehicles; for most, replacement chemicals are either not available or are also under review by the TSCA program.

¹ Auto Innovators represents the full auto industry, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive auto industry that supports U.S. economic and national security. Representing approximately 5 percent of the country's GDP, responsible for supporting nearly 10 million jobs, and driving \$1 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector. www.autosinnovate.org. The NAICS code for automobile manufacturing is 336111.

² <https://sam.gov/opp/91944bedd2bf4222b340dcca7f81337/view>.

The information that we can provide does not fit easily in the Table 2 information template provided in the RFI, but we provide here a few examples that may be of use to DoD. If this type of information is valuable, we would be happy to delve further into our database(s) to gather additional data.

For example:

1,3-Butadiene

1,3-butadiene is considered a "building block chemical" and as such is a basic starting chemistry in a multitude of other chemicals and products. It is used as an intermediate in the production of various synthetic rubbers, plastics, and other polymers, and acts as a base that can be combined with other chemistries to create larger molecules with desired properties for products such as car parts, rubber products, neoprene, and more. Substitutes are not readily available for many of these applications. 1,3-butadiene is a chemical critical for the automotive sector and as such has applications highly relevant to the DoD.

Butyl benzyl phthalate - 1,2-Benzene- dicarboxylic acid, 1- butyl 2(phenylmethyl) ester (BBP)

In the automotive sector, BBP is primarily used as a plasticizer in various products, including adhesives, sealants, paints, and coatings, particularly in flexible polyvinyl chloride applications. It enhances the flexibility and durability of these materials, making them suitable for automotive parts. Additionally, BBP is found in some automotive paints and brake-related products for safety purposes. BBP is a chemical critical for the automotive sector and as such has applications highly relevant to the DoD.

Octamethylcyclotetra- siloxane (D4)

D4 is used extensively throughout automotive products with a wide scope of applications related to durability and safety.

We would welcome the opportunity to work with the DoD on this effort and gather additional information that may better inform your analysis of critical applications for DoD and the DIB. Please feel free to contact me at CPalin@autosinnovate.org.

Sincerely,



Catherine Palin
Alliance for Automotive Innovation