

## **BICEP Members:**

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|--|-------------------------------|
| Adobe                                  | LinkedIn                      |
| Akamai Technologies                    | Lyft                          |
| Annie's Inc                            | Mars Incorporated             |
| Autodesk, Inc.                         | Mass Brigham General          |
| Aveda                                  | McDonald's                    |
| Avocado Green brands                   | Microsoft                     |
| Autodesk                               | Nature's Path Foods           |
| Ball Corporation                       | Nestle                        |
| Ben & Jerry's                          | New Belgium Brewing           |
| Biogen                                 | Nike                          |
| BlueCross Blue Shield of Massachusetts | NortonLifeLock                |
| Burns & McDonnell                      | Novartis                      |
| Burton Snowboards                      | Outdoor Industry Association  |
| Burt's Bees                            | Owens Corning                 |
| Clif Bar                               | Palisades Tahoe               |
| CommonSpirit                           | Patagonia                     |
| Danone N.A.                            | PayPal                        |
| DSM                                    | PepsiCo, Inc                  |
| eBay Inc.                              | Portland Trail Blazers        |
| Eileen Fisher                          | REI                           |
| Etsy                                   | Salesforce                    |
| Fetzer Vineyards                       | SFO                           |
| Gap Inc.                               | Seventh Generation            |
| General Mills                          | Sierra Nevada                 |
| Hackensack Meridian Health             | Snowsports Industries America |
| Hannon Armstrong                       | Starbucks                     |
| Happy Organics                         | Stonyfield Farm               |
| IKEA                                   | The North Face                |
| Impossible Foods                       | Tiffany & Co.                 |
| Indigo Agriculture                     | Timberland                    |
| JLL                                    | Unilever                      |
| Kaiser Permanente                      | VF Corporation                |
| The Kellogg Company                    | Vail Resorts                  |
| L Brands                               | Workday                       |
| L'Oreal                                | Worthen Industries            |
| Levi Strauss & Co.                     |                               |

September 27th, 2021|

Administrator Michael Regan  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20450

Re: Revised 2023 and Later Model Year Light Duty Vehicle Greenhouse Gas Emissions Standards; Docket ID No. EPA-HQ-OAR-2021-0208

Dear Administrator Regan,

I write on behalf of the Ceres BICEP (Business for Innovative Climate and Energy Policy) Network - a coalition of 75 major employers across the United States. BICEP Network members are committed to ambitious climate action, advocating for stronger climate and clean energy policies at the state and federal levels in the U.S. On behalf of these companies, I write to urge you to adopt the most stringent proposal - Alternative 2 - to replace the SAFE Part II regulations adopted by the Trump Administration.

The recent IPCC report, which was characterized as a “[code red](#) for humanity” by UN Secretary-General Guterres, underscores the urgency of drastically reducing greenhouse gas (GHG) emissions in the next decade. Given that the transportation sector is the largest source of U.S. GHG emissions, strong standards are critical to meeting U.S. climate goals. In order for our member companies to meet their own climate goals and commitments, strong policy is needed to ensure sectoral change, and ensure the availability of clean vehicles across the U.S., as well as drive the necessary shift to electrification. Adopting standards at least as stringent as Alternative 2 will be necessary to ensure this critical transition.

Our members see climate change as a significant business risk, and reducing GHGs as a major economic opportunity. They recognize that strong standards will serve to mitigate the economic risks associated with our continuing dependence on oil. In light of the volatility of fuel prices, strong standards are needed in order to reduce transportation costs for businesses and consumers; and electric vehicles will reduce operating and maintenance costs in addition to providing important air quality benefits, especially in disadvantaged communities. In addition, given the important role of strong standards in driving innovation, strong standards will also help ensure the global competitiveness of the U.S. industry.

A recent [analysis](#) commissioned by Ceres and produced by independent automotive industry analysts finds that strong standards would benefit the U.S. auto industry. Specifically, strong standards would make automakers more globally competitive, and reduce risk in the event of future fuel price spikes. Strong standards would especially benefit auto suppliers, which account for about 78% of auto industry jobs.

Finally, standards driving EV production will not only benefit U.S. suppliers in particular, but also provide incentives to build a robust domestic EV supply chain, which is critical to job growth.

Thus, on behalf of the companies in the BICEP network, I urge EPA to adopt regulations at least as stringent as the Alternative 2 proposal. We also urge EPA to ensure that the next round of standards ensure at least 60% reduction in emissions, and at least 50% EV sales by 2030, in order to put the industry on a glide path to 100% EV sales by 2035 at the latest. Thank you for your consideration of these comments.

Sincerely,



**Anne L. Kelly**

Vice President Government Relations,

On behalf of Business for Innovative Climate and Energy Policy (BICEP)

The [Ceres BICEP Network](http://www.ceres.org/BICEP) comprises influential companies advocating for stronger climate and clean energy policies at the state and federal level in the U.S. As powerful champions of the accelerated transition to a low-carbon economy, Ceres BICEP Network members have weighed in when it has mattered most. For more information on the Ceres BICEP Network, visit [www.ceres.org/BICEP](http://www.ceres.org/BICEP).

*For additional information, please contact Carol Lee Rawn, Senior Director, Transportation at Ceres ([rawn@ceres.org](mailto:rawn@ceres.org)).*

cc:

Acting Administrator Steve Cliff

National Highway Traffic Safety Administration

Gina McCarthy

National Climate Advisor

Ali Zaidi

Deputy National Climate Advisor