

May 20, 2022

The Honorable Gina M. Raimondo
Secretary
Department of Commerce
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

RE: Environmental Technology, Goods and Services Industry Supply Chain Discussions
ETTAC Recommendation 2021-12

Dear Secretary Raimondo:

The Environmental Technologies Trade Advisory Committee (ETTAC) is a federally-established committee whose purpose is to advise on the policies and procedures of the U.S. government that affect exports of environmental technology, goods and services in the air, water, solid waste and recycling sectors. This includes small to large businesses and, trade associations. In this capacity, the ETTAC appreciates the opportunity to provide these comments and recommendations to help achieve policy goals of a more resilient, diverse and secure supply chain essential to U.S. environmental technology, goods and services providers.

U.S. manufacturers already understand too well the challenging global nature of current supply chains and they need support, including labor and infrastructure development, to overcome these challenges in order to expand domestic capabilities. Executive Order 14017 on America's Supply Chains, the subsequent 100-Day Reviews, a Capstone report including One-year Sectoral Assessments, reflect the initial efforts in identifying some supply chain vulnerabilities for key U.S. manufacturers. We strongly support the initiative, but this is only a start. Effective long-term solutions for improving the supply chain should be expanded.

Reflecting the fact that air, water, natural resources, solid waste and recycling sectors provide the foundation for all industry production, services, and commerce, as well as the fundamental basis for a circular economy essential to long-term human existence, these sectors must be included in the dialog around supply chain issues and solutions. Inclusion of these sectors is critical to meeting global climate goals.

The ETTAC recommends:

- Include representatives of the environmental technology, goods and services from the air, water, natural resources, waste, and recycling sectors in the future multi-stakeholder global summit identified in the 100-Day Supply Chain Report, to be organized by Department of Commerce and Department of State, and held in late 2022.
- The Department of Commerce, along with the Department of Energy, should hold one or more roundtable discussions on the effects of the supply chain on the environmental

technology, goods and services in the air, water, natural resources, solid waste and recycling sectors. We recommend interagency dialog with key industry representatives to understand the impact of the supply chain on achieving climate goals and the energy sector transition, as well as to collaboratively identify solutions to the challenges highlighted by the dialog.

- The Capstone report recommends a quadrennial report due in 2025 to look at the industrial bases outlined in the initial report as directed by Executive Order 14017. We recommend that the quadrennial report be more inclusive and representative of environmental technology, goods and services for air, water, natural resources, solid waste and recycling sectors in future assessments.
- Timely development of new processing and manufacturing facilities are needed to support the global energy transition and US competitiveness in environmental technology goods and services, reducing supply chain bottlenecks. To support these new facilities, we recommend applicable U.S. Government agencies (e.g. GSA, EPA, Army Corp of Engineers, CEQ) work with local and state governments to help them improve and streamline permitting and regulatory processes for construction sites, as well as develop incentives or dedicated program funds for infrastructure development (e.g. port access, roads, water supply, wastewater treatment, power, etc.) needed for such facilities.

We appreciate the Administration's consideration of these comments and suggestions.

Sincerely,



William Decker
ETTAC Chair

CC: Secretary of State Antony Blinken
Secretary of U.S. Department of Energy Jennifer Granholm
Army Corps of Engineers
Environmental Protection Agency
GSA
CEQ