



GRPE Lifecycle Analysis USEPA Position

86th Session of the GRPE
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Lifecycle Analysis (LCA)

- Thank you to the GRPE for exploring the topic of LCA
- LCA is important topic and EPA expects to receive comments regarding the application of LCA's in the context of our future rulemakings
- EPA believes that LCA could be an important tool for guiding technical research and informing policy decisions



EPA Position

- EPA supports the creation of an IWG for information sharing only
 - Initial goals should be to share information regarding the inputs and the methodology for conducting a robust LCA
 - Mandate like the original mandate for the EVE
- We do not currently support the creation of a GTR
- There is a need to determine if and how an LCA would fit into a regulatory structure
- Interim determinations should not be published
 - For example, publishing results for just the manufacturing phase should be avoided
- Recognize that some of the technical experts to conduct an LCA may not reside within the GRPE