



Delaware State Farm Bureau
3457 S. DuPont Highway
Camden, DE 19934

Office: (302) 697-3183 / Fax: (302) 697-1428
defb.org

Comments on

1140 Delaware Low Emission Vehicle Program - Docket # 2022-R-A-0011

The Delaware Farm Bureau (DEFB) has reviewed the substance of the proposed regulation and considered the potential impact of its full implementation. There are many likely economic and societal impacts which appear not to have been fully considered and planned for by DNREC. If such impacts have been considered, this has not yet been sufficiently communicated by DNREC to the Delaware public for DEFB to support public policy steps of this magnitude. **DEFB opposes this proposed regulation as currently written and encourages revisions to address these shortcomings.**

DEFB concerns regarding the ramifications of implementing this proposed regulation include:

- Government interference in economic fundamentals is steering decision making that is better left to citizens and market forces.
- Travel times to and from many destinations will be extended due to the time it takes to recharge an EV battery. Some trips will take twice as long, if not longer.
 - This will inevitably adversely impact American productivity and disrupt business planning.
 - This impact will increase the cost of goods and services.
 - Supply chain disruptions are also likely.
- Public awareness seems to be lacking regarding how to respond in the event of EV fires. The contents of an NTSB report - Safety Risks to Emergency Responders from Lithium-Ion Battery Fires in Electric Vehicles, an eighty-page report should be broadly disseminated. A massive public education effort is required along with proper training and equipment for first responders.
- The materials required for EV batteries include several currently obtained from countries which are not friends of the United States and some which engage in worker exploitation. Until such time as the U.S. can be self sufficient in providing these inputs, the pace of EV implementation should be measured. This is a national security issue.

These are just a few issues expressed by DEFB members since the proposed regulation was posted.

Respectfully submitted,

Wm. Donald Clifton

Executive Director