

**MICHIGAN MERCURY
POLLUTION PREVENTION
TASK FORCE (M2P2)**

RECOMMENDATIONS:

General Public Subgroup Recommendations:

<1> THE STATE OF MICHIGAN SHOULD UNDERTAKE AN AGGRESSIVE, COMPREHENSIVE STATE-WIDE EDUCATION/AWARENESS CAMPAIGN WITH STRONG SUPPORT FROM THE GOVERNOR TO THE LEAD AGENCY TO ALERT PEOPLE ON WAYS THEY CAN REDUCE MERCURY POLLUTION.

<2> • MDEQ SHOULD DEVELOP A MERCURY MANUAL, INVOLVING ALL STAKEHOLDERS.

<3> • MDEQ, INVOLVING ALL STAKEHOLDERS, SHOULD DEVELOP ENERGY CONSERVATION AND ENERGY EFFICIENCY MATERIAL FOR DISTRIBUTION.

<4> • MDEQ SHOULD DEVELOP A MERC CONCERN VIDEO.

<5> • THE GOVERNOR OF MICHIGAN, THE DIRECTOR OF THE OFFICE OF THE GREAT LAKES, THE DIRECTOR OF MDEQ AND THE DIRECTOR OF MDCH SHOULD CALL UPON RETAILERS TO VOLUNTARILY CEASE DISTRIBUTION OF TOYS, GAMES AND CLOTHING CONTAINING MERCURY.

<6> • MICHIGAN DEPARTMENT OF EDUCATION SHOULD DEVELOP A MERCURY FACT SHEET AND/OR VIDEO FOR SCIENCE TEACHERS.

<7> • MICHIGAN DEPARTMENT OF EDUCATION SHOULD DEVELOP A MERCURY EDUCATION/ AWARENESS COMPONENT FOR SCHOOL CURRICULUM.

<8> • MDCH SHOULD CONTINUE DISTRIBUTION OF EDUCATIONAL MATERIALS FOR WOMEN OF CHILDBEARING AGE WITH REGARD TO EATING MICHIGAN FISH.

<9> DECENTRALIZE THE EDUCATION/OUTREACH PROCESS BY WORKING WITH LOCAL COUNTIES AND CITIES ENCOURAGING MERCURY P2 EDUCATION/OUTREACH AT A LOCAL LEVEL

<10> COUNTY ENVIRONMENTAL HOUSEHOLD HAZARDOUS WASTE (HHW) COLLECTION PROGRAMS SHOULD REPRINT THE MERC CONCERN BROCHURES, USE THE MERCURY DISPLAYS AND PROVIDE FOR SAFE COLLECTION AND DISPOSAL FOR MERCURY CONTAMINATED HHW.

<11> LOCAL ENVIRONMENTAL HEALTH DEPARTMENTS SHOULD COLLABORATE WITH LOCAL GOVERNMENTS, PUBLIC AND PRIVATE ORGANIZATIONS, AND GRASSROOTS ORGANIZATIONS TO RAISE MERCURY AWARENESS IN THEIR COMMUNITY.

Health Care Subgroup Recommendations:

<12> MDEQ WORKING IN COOPERATION WITH THE MICHIGAN HEALTH AND HOSPITAL ASSOCIATION (MHHA) SHOULD SEND LETTERS TO ALL MICHIGAN HEALTH CARE FACILITIES ENCOURAGING THE PHASE OUT OF MERCURY-CONTAINING PRODUCTS/DEVICES BY CONTINUING MERCURY P2 EFFORTS WHILE ALLOWING FOR THE EXERCISE OF JUDGMENT BY HEALTH CARE PROFESSIONALS.

<13> MDEQ AND THE MICHIGAN HEALTH AND HOSPITAL ASSOCIATION SHOULD CONTINUE THE EDUCATION OUTREACH PROCESS WITH THE HEALTH CARE INDUSTRY.

<14> HOSPITALS SHOULD DISCONTINUE THE PRACTICE OF SENDING MERCURY THERMOMETERS HOME WITH NEWBORNS.

<15> MDEQ SHOULD EVALUATE VETERINARY CLINIC USES OF MERCURY AND ENCOURAGE SIMILAR MERCURY P2 ACTIVITIES AS IN THE HUMAN HEALTH CARE INDUSTRY.

Dental Subgroup Recommendations:

<16> ENCOURAGE THE NATIONAL INSTITUTE OF DENTAL RESEARCH AND THE AMERICAN ASSOCIATION OF DENTAL SCHOOLS TO EMPHASIZE THE USE OF DENTAL AMALGAM ALTERNATIVES, WHICH COULD EVENTUALLY REPLACE THE USE OF MERCURY IN DENTAL RESTORATIONS AND OBIATE THE NEED FOR SOPHISTICATED AND EXPENSIVE FILTRATION SYSTEMS AND PROPER HANDLING PROCEDURES.

<17> THE M2P2 TASK FORCE CALLS UPON ALL MICHIGAN DENTAL OFFICES TO ELIMINATE THE USE OF BULK MERCURY.

<18> THE AMERICAN DENTAL ASSOCIATION, THE MICHIGAN DENTAL ASSOCIATION AND MICHIGAN SCHOOLS OF DENTISTRY SHOULD

INCREASE EDUCATION AMONG DENTAL PERSONNEL ABOUT PROPER DENTAL AMALGAM WASTE COLLECTION AND DISPOSITION.

<19> MDEQ AND THE MICHIGAN DENTAL ASSOCIATION SHOULD USE THE CITY OF DETROIT'S EFFORT TO REDUCE DISCHARGE OF MERCURY WASTE FROM DENTAL FACILITIES AS A PILOT FOR THE REST OF THE STATE TO FOLLOW.

<20> MDEQ AND THE MICHIGAN DENTAL ASSOCIATION SHOULD ENCOURAGE INSURANCE COMPANIES TO DEVELOP PAYMENT PLANS WHICH INCLUDE COMPETITIVE COVERAGE FOR ALTERNATIVES TO DENTAL AMALGAMS.

<21> MDEQ AND THE MICHIGAN DENTAL ASSOCIATION SHOULD DEVELOP AND IMPLEMENT AN AMALGAM WASTE TRACKING SYSTEM.

<22> THE MICHIGAN DENTAL ASSOCIATION SHOULD ENCOURAGE THE AMERICAN DENTAL ASSOCIATION OR THE INTERNATIONAL STANDARDS ORGANIZATION AND THE NATIONAL SANITATION FOUNDATION TO CONDUCT EFFICIENCY TESTING ON THE SYSTEMS MARKETED FOR THE CAPTURE OF WASTE AMALGAM.

<23> THE NATIONAL INSTITUTE OF DENTAL RESEARCH, THE AMERICAN DENTAL ASSOCIATION AND DENTAL MANUFACTURERS SHOULD CONDUCT ADDITIONAL RESEARCH ON RESTORATIVE MATERIAL ALTERNATIVES AND ALSO CAPTURE TECHNOLOGY FOR DENTAL AMALGAM WASTE.

Electrical Manufacturers/Users Subgroup Recommendations:

<24> MDEQ SHOULD CONTINUE MERCURY P2 EDUCATION AND OUTREACH EFFORTS BY INFORMING USERS OF THE VARIOUS TYPES OF BATTERIES THAT CONTAIN MERCURY AND PROVIDE INFORMATION ON ALTERNATIVES AND AVAILABLE RECYCLING CENTERS.

<25> MDEQ SHOULD ENSURE THAT MERCURY BATTERY MANUFACTURERS COMPLY WITH MICHIGAN'S NEW BATTERY LAW.

<26> MDEQ SHOULD WORK WITH LAMP MANUFACTURERS AND ENCOURAGE THEIR CONTINUED EFFORT TO REDUCE THE QUANTITY OF MERCURY REQUIRED FOR OPERATION AND ENCOURAGE DEVELOPMENT OF ECONOMICALLY FEASIBLE ALTERNATIVES WITH COMPARABLE ENERGY EFFICIENCY RATINGS.

<27> MDEQ SHOULD CONTINUE TO WORK WITH USEPA TO ENCOURAGE FACILITIES TO PARTICIPATE IN US EPA'S GREEN LIGHTS PROGRAM.

<28> MDEQ SHOULD CONTINUE ITS EFFORT ON INCORPORATING THE UNIVERSAL WASTE RULE (UWR) INTO MICHIGAN REGULATIONS TO INCLUDE SUCH MERCURY-CONTAINING WASTES AS THERMOSTATS, BATTERIES, BANNED PESTICIDES AND MERCURY-CONTAINING LAMPS AS UNIVERSAL WASTES.

<29> MDEQ SHOULD DETERMINE IF FLUORESCENT LIGHT BARREL CRUSHERS ARE A SIGNIFICANT SOURCE OF FUGITIVE MERCURY EMISSIONS TO THE ATMOSPHERE AND DEVELOP A POLICY/RECOMMENDATION ON THIS PROCESS.

<30> MDEQ SHOULD ENCOURAGE MICHIGAN FACILITIES TO PARTICIPATE IN THE HONEYWELL CORPORATION'S REVERSE DISTRIBUTION RECYCLING PROGRAM FOR MERCURY-CONTAINING THERMOSTATS.

<31> MDEQ SHOULD EXTEND THE EDUCATIONAL/OUTREACH CAMPAIGN AND COLLECTION PROGRAM FOR PRODUCTS CONTAINING MERCURY IN THE LAKE SUPERIOR BASIN TO MICHIGAN'S LOWER PENINSULA.

<32> MDEQ SHOULD CONTACT SWITCH MANUFACTURERS AND USERS OF SWITCHES INCLUDING CONTRACTORS AND TRADE ASSOCIATIONS TO IMPROVE THE ESTIMATE FOR MERCURY SWITCHES USE AND DISPOSAL

Chemical Manufactures/Users Subgroup Recommendations:

<33> THE M2P2 TASK FORCE RECOMMENDS THE MICHIGAN CHEMICAL COUNCIL UNDERTAKE AN ASSESSMENT OF THE QUANTITIES AND TYPES OF MERCURY USED BY THE MICHIGAN CHEMICAL INDUSTRY AND THE VOLUNTARY POLLUTION PREVENTION METHODS BEING USED TO PREVENT RELEASES TO THE ENVIRONMENT AND SHARE WITH MDEQ FOR PUBLIC DISSEMINATION.

<34> ALL STAKEHOLDERS SHOULD BE INVOLVED IN THE DEVELOPMENT OF A NATIONAL LABELING REQUIREMENT FOR PRODUCTS OR COMPONENTS WHICH CONTAIN A SIGNIFICANT PERCENTAGE OF MERCURY FOR ITS FUNCTION OR AS AN ADDED INGREDIENT. THIS WOULD ALLOW CONSUMERS AND BUSINESSES TO MAKE INFORMED CHOICES IN EFFORTS TO SUPPORT POLLUTION PREVENTION PROGRESS.

<35> MICHIGAN SHOULD PROVIDE INCENTIVES TO PROMOTE VOLUNTARY POLLUTION PREVENTION EFFORTS. MANY OF THESE EFFORTS HAVE ALREADY BEEN EXTREMELY SUCCESSFUL. INCENTIVES COULD INCLUDE TAX CREDITS OR GRANTS THAT COULD BE GIVEN TO COMPANIES FOR POLLUTION PREVENTION TRAINING AND EDUCATION.

<36> INCREASE THE DIALOGUE WITH INDUSTRY TOWARD FURTHER VOLUNTARY POLLUTION PREVENTION INITIATIVES. AT THE NATIONAL LEVEL THE CHEMICAL MANUFACTURER'S ASSOCIATION RESPONSIBLE CARE® PROGRAM MAY BE THE APPROPRIATE AVENUE TO BRING MORE FOCUS ON MERCURY POLLUTION PREVENTION OPPORTUNITIES IN THE CHEMICAL INDUSTRY. ONGOING INVOLVEMENT OF THE MICHIGAN CHEMICAL COUNCIL IS ENCOURAGED AT THE STATE LEVEL.

<37> THE M2P2 TASK FORCE URGES THE CONTINUED EFFORT BY THE MDEQ INDUSTRIAL PRETREATMENT PROGRAM STAFF TO DISSEMINATE INFORMATION TO LOCAL PRETREATMENT AUTHORITIES AND OTHERS ON MERCURY-CONTAINING PRODUCTS AND PROCESSES AND OPPORTUNITIES FOR P2.

<38> THE THRESHOLDS FOR MERCURY EMISSIONS UNDER THE TOXIC CHEMICAL RELEASE INVENTORY (TRI) MAY NEED TO BE EVALUATED. THIS REPORTING THRESHOLD MAY BE OF QUESTIONABLE UTILITY GIVEN THAT THE PRESENT REPORTING THRESHOLD FOR MERCURY IS 10,000 POUNDS/YEAR AND THE MICHIGAN ANTHROPOGENIC ATMOSPHERIC EMISSIONS ARE ESTIMATED TO BE BETWEEN 8,000-10,000 POUNDS/YEAR.

<39> THE MICHIGAN CHEMICAL COUNCIL AND MDEQ SHOULD WORK COOPERATIVELY AT IMPROVING THE INVENTORY OF MERCURY RELEASED INTO MICHIGAN'S ENVIRONMENT FROM THE MICHIGAN CHEMICAL INDUSTRY TO IMPROVE THE SCIENTIFIC BASE OF KNOWLEDGE IN MICHIGAN.

<40> WITH THE ASSISTANCE OF THE MANUFACTURING AND CHEMICAL SECTORS THE MDEQ SHOULD UNDERTAKE MORE EDUCATIONAL EFFORTS ON P2 EFFORTS REGARDING MERCURY. THE INFORMATIONAL FLYER ON AQUEOUS CLEANERS IS A GOOD EXAMPLE OF WHAT MIGHT BE DONE (APPENDIX I).

Automobile Subgroup Recommendations

<41> THE AMERICAN AUTOMOBILE MANUFACTURERS ASSOCIATION SHOULD DEVELOP A MERCURY-CONTAINING SWITCH REMOVAL

PROCEDURE FOR CURRENT VEHICLES BY DISMANTLERS TO FOSTER SAFE HANDLING AND DISPOSAL.

<42> MDEQ SHOULD FOLLOW UP ON THE LETTER FROM THE ASSOCIATION OF INTERNATIONAL AUTOMOBILE MANUFACTURERS (AIAM) REQUESTING ASSISTANCE IN ADDRESSING DISPOSAL/RECYCLING NEEDS REGARDING MERCURY SWITCHES IN THE CURRENT FLEET OF THEIR MEMBER COMPANY VEHICLES.

<43> THE AMERICAN AUTOMOBILE MANUFACTURERS ASSOCIATION OR MDEQ SHOULD PROVIDE THE SWITCH REMOVAL PROCEDURE TO AIAM FOR A DETERMINATION OF APPLICABILITY TO THE VEHICLES NOTED IN RECOMMENDATION 42 ABOVE.

<44> MDEQ SHOULD PROVIDE ADEQUATE RESOURCES FOR QUALITY ASSURANCE CHECKS ON THE MICHIGAN CRITICAL MATERIALS REPORT AND COMPUTER PROCESSING IF THE REPORT IS TO PROVIDE A RELIABLE BASIS FOR MONITORING USE AND POTENTIAL RELEASES OF MERCURY IN THE FUTURE.

Utility Sector Recommendations:

<45> THE M2P2 TASK FORCE, MDEQ AND THE MICHIGAN PUBLIC SERVICE COMMISSION SHOULD ENCOURAGE USEPA TO FINALIZE THE MERCURY AND UTILITY STUDIES AND ENSURE THAT SIGNIFICANT RESOURCES ARE ALLOCATED TO DETERMINE THE SCIENTIFIC BASIS TO PROMULGATE NATIONAL STANDARDS FOR MERCURY EMISSIONS FROM ELECTRIC UTILITY BOILERS.

<46> THE MPSC AND THE MDEQ, WORKING IN COOPERATION WITH MICHIGAN UTILITIES, SHOULD SUPPORT ADDITIONAL RESEARCH EFFORTS TO EVALUATE THE FULL ENVIRONMENTAL COSTS AND IMPACTS OF MERCURY EMISSIONS AND SUBSEQUENT DEPOSITION FROM ELECTRIC POWER GENERATION.

<47> MICHIGAN UTILITIES SHOULD CONTINUE TO SUPPORT PROJECTS ON EVALUATING RENEWABLE ENERGY SOURCES, INCLUDING WIND AND SOLAR ENERGY. THE RESULTS OF ALL APPLICABLE STUDIES SHOULD BE SHARED WITH THE MPSC AND MDEQ AND IF DETERMINED TO BE ECONOMICALLY AND TECHNICALLY FEASIBLE, ADDITIONAL RELIANCE ON RENEWABLES SHOULD BE IMPLEMENTED.

<48> THE M2P2 TASK FORCE CALLS UPON ELECTRIC UTILITIES TO FACTOR IN THE COSTS AND BENEFITS OF MERCURY EMISSIONS CONTROL INTO ALL ENVIRONMENTAL IMPACT STATEMENTS (EIS) REQUIRED UNDER FEDERAL AND STATE LAW.

<49> THE M2P2 TASK FORCE CALLS UPON MICHIGAN UTILITIES TO DEVELOP A PLAN WITH TIMETABLES AND GOALS THAT ARE MEASURABLE, IN QUANTITATIVE OR OTHER TERMS, AS WELL AS MEANS TO ACHIEVE THE GOALS, TO FURTHER REDUCE MERCURY USAGE OR EMISSIONS FROM THE GENERATION OF ELECTRICITY AND/OR OTHER SOURCES. THIS PLAN SHOULD BE SUBMITTED TO MDEQ AND MPSC AND PROGRESS IN ACHIEVING MERCURY REDUCTIONS SHOULD BE REPORTED ON AN ANNUAL BASIS.

State Government Recommendations:

<50> MICHIGAN SHOULD: ALLOCATE THE NECESSARY RESOURCES TO IMPLEMENT THE MERCURY P2 RECOMMENDATIONS WITHIN THIS REPORT.

<51> MDEQ SHOULD TAKE THE LEAD IN CONTINUING TO FACILITATE THE IMPLEMENTATION OF THE NUMEROUS RECOMMENDATIONS IN THIS REPORT. THESE RECOMMENDATIONS ENCOMPASS COMMUNICATION, COORDINATION, EDUCATION, TRAINING AND DECENTRALIZATION OF MERCURY P2 EFFORTS TO THE LOCAL LEVEL. THE FOLLOWING ARE MORE SPECIFIC RECOMMENDATIONS TO THE MDEQ, BUT SHOULD INVOLVE ALL STAKEHOLDERS:

<52> • FACILITATE P2 BY OTHER STATE DEPARTMENTS REGARDING MERCURY.

<53> • DEFINE SUCCESS. I.E. HOW DO WE MEASURE SUCCESS OF MERCURY reduction efforts?

<54> • CONTINUE COMMUNICATION WITH MANUFACTURERS AND END USERS OF MERCURY-CONTAINING PRODUCTS/DEVICES AND IDENTIFY POTENTIAL MERCURY POLLUTION PREVENTION POSSIBILITIES AND ENCOURAGE IMPLEMENTATION.

<55> • DEVELOP A “MERCURY MANUAL” FOR THE MDEQ-EAC; ENVIRONMENTAL ASSISTANCE CENTER, INVOLVING ALL STAKEHOLDERS AND SHARE WITH MDEQ DISTRICT OFFICES.

<56> •COORDINATE THE DEVELOPMENT OF ADDITIONAL EDUCATION/OUTREACH MATERIALS.

<57> • WORK WITH THE VARIOUS DIVISIONS IN MDEQ (AIR, WATER AND WASTE) TO COORDINATE PERMITTING AND COMPLIANCE ISSUES RELATED TO MERCURY.

<58> • INCLUDE MERCURY P2 INFORMATION IN MDEQ STAFF TRAINING.

<59> • DEVELOP A MECHANISM TO RECOGNIZE MERCURY-FREE COMPANIES/INSTITUTIONS OR COMPANIES/INSTITUTIONS THAT HAVE MADE A SIGNIFICANT MERCURY REDUCTION EFFORT.

<60> • MDEQ SHOULD CONSIDER A PERIODIC MERCURY MEETING WITH KEY STAKEHOLDERS TO MAINTAIN FOCUS ON VOLUNTARY MERCURY P2 EFFORTS AND ACCOMPLISHMENTS.

<61> THE STATE OF MICHIGAN SHOULD BECOME A U.S. EPA GREEN LIGHTS PARTNER.

<62> THE STATE OF MICHIGAN DEPARTMENT OF MANAGEMENT AND BUDGET (DMB) SHOULD DEVELOP A STATE PURCHASING POLICY THAT IDENTIFIES MERCURY-CONTAINING PRODUCTS AND PURCHASES MERCURY-FREE ALTERNATIVES, WHEN AVAILABLE.

<63> THE STATE OF MICHIGAN SHOULD RECYCLE MERCURY-CONTAINING PRODUCTS AND WASTES, WHERE FEASIBLE.

<64> MDEQ AND THE MICHIGAN DEPARTMENT OF PUBLIC HEALTH (MDPH) SHOULD PROVIDE THE NECESSARY RESOURCES TO IMPROVE MICHIGAN'S MERCURY INVENTORY DATA WITHIN THE STATE AND ESTABLISH DATABASES OF INFORMATION ON MERCURY.

Suggested Mercury Legislation

The following Mercury legislation should be considered to facilitate mercury P2 efforts.

<65> • THE STATE OF MICHIGAN SHOULD CREATE, BY STATUTE, A MICHIGAN ENERGY BANK WITH THE AUTHORITY TO FINANCE ENERGY AUDITS AND ENERGY-RELATED CAPITAL IMPROVEMENTS FOR PUBLIC BUILDINGS, INCLUDING THOSE OCCUPIED BY STATE AGENCIES AND LOCAL SCHOOL DISTRICTS.

<66> • THE STATE OF MICHIGAN SHOULD ENACT LEGISLATION OR REVISE RULES THAT BRINGS THE STATE'S HAZARDOUS WASTE REGULATIONS INTO CONFORMANCE WITH THE UNIVERSAL WASTE RULE AS IT PERTAINS TO MERCURY THERMOSTATS, BATTERIES AND BANNED PESTICIDES FURTHER, MICHIGAN SHOULD SEEK EXPANSION OF THE RULE TO INCLUDE MERCURY-CONTAINING LAMPS AND SWITCHES, THERMOMETERS AND MERCURY-CONTAINING MEDICAL

DEVICES TO SIMPLIFY THE COLLECTION AND RECYCLING OF THESE WASTES.

<67> • THE STATE OF MICHIGAN SHOULD ENACT LEGISLATION THAT EDUCATES THE PUBLIC ON THE RESPONSIBILITY OF INDIVIDUALS TO DIVERT MERCURY-BEARING MATERIALS FROM THE MUNICIPAL WASTE STREAM. SIMILAR TO LEGISLATION ENACTED IN MINNESOTA, THE LEGISLATION SHOULD PROHIBIT THE KNOWING DISPOSAL BY ANY PERSON OF MERCURY-BEARING THERMOMETERS, TOYS, GAMES, BATTERIES, FLUORESCENT LIGHTS AND THERMOSTATS IN A WASTE STREAM DIRECTED TO AN INCINERATOR. BECAUSE THE LEGISLATION IS DESIGNED TO EDUCATE INDIVIDUALS AND BUSINESSES, IT SHOULD SPECIFICALLY EXEMPT INCINERATOR OPERATORS FROM ENFORCEMENT FOR VIOLATIONS COMMITTED IN THE NORMAL COURSE OF INCINERATOR OPERATION.

<68> • THE STATE OF MICHIGAN SHOULD SUPPORT LEGISLATION THAT REQUIRES HEALTH CARE FACILITIES TO DEMONSTRATE THAT THEY HAVE INSTITUTED A PROCESS TO REDUCE USES AND SEPARATE WASTES KNOWN TO CONTAIN MERCURY FROM THEIR WASTE STREAM BEFORE WASTES ARE SHIPPED FOR INCINERATION OR INCINERATED ON SITE.

<69> • MICHIGAN SHOULD CHALLENGE ANALYTICAL STANDARDS SETTING AGENCIES INCLUDING EPA AND THE STANDARD METHODS JOINT EDITORIAL BOARD TO ADDRESS MERCURY POLLUTION PREVENTION OPPORTUNITIES THROUGH REVISIONS TO APPROVE ANALYTICAL METHODS AND DIRECTIONS FOR LABORATORY USE, HANDLING AND RECYCLING OR PROPER DISPOSAL OF MERCURY.

<70> • MICHIGAN SHOULD PURSUE OTHER SECTOR STANDARD SETTING ORGANIZATIONS ASSOCIATED WITH THE DESIGN PHASE OF PRODUCTS WHICH MAY HAVE A SIGNIFICANT IMPACT ON ELIMINATING/LOWERING MERCURY USE IN FUTURE PRODUCTS. (EFFORTS SIMILAR TO THE SAE P2 WHITE PAPER SHOULD BE PURSUED BY THE STATE AND OTHER KEY STAKEHOLDERS