

March 22, 2023

To Achieve Clean Air Goals, EPA's Greenhouse Gas Phase 3 Rule Must Align with HDOH ZEV Infrastructure Development

Environmental objectives will not be realized without adequate investments in ZEV infrastructure

Transitioning the U.S. trucking industry to zero-emission vehicles (ZEVs) is essential to reducing greenhouse gas emissions and achieving cleaner air and healthier communities. Industry leaders, including the Truck and Engine Manufacturers Association (EMA) and its member companies, are eager to work with the U.S. Environmental Protection Agency (EPA) and other stakeholders to achieve these vital environmental goals.

This year, EPA will finalize a new greenhouse gas (GHG) Phase 3 rule that can provide a monumental opportunity to accelerate the transition of the nation's trucking fleet to ZEVs. EMA member companies are investing billions of dollars to develop and bring to market heavy-duty on-highway (HDOH) ZEVs that will meet their customers' needs. The availability of those products will not alone ensure that trucking fleets will buy and use ZEVs. Two key challenges must be overcome to successfully accelerate the use of commercial ZEVs: (i) they must be profitable for trucking fleets to purchase and operate, and (ii) the necessary infrastructures must be available to keep the ZEVs powered. Due to the unique demands of HDOH ZEVs, those critically-needed infrastructures must consist of both electricity chargers and hydrogen fueling stations.

EPA's GHG Phase 3 rule will require manufacturers to sell HDOH ZEVs. To successfully achieve that goal, adequate electricity charging and hydrogen fueling infrastructures must be in place to power the ZEVs. The interdependence of those environmental, economic, and transportation benefits means that a well-crafted rule can transform our communities, roads, and commerce. Aligning the ZEV goals in the GHG Phase 3 rule with the development of the ZEV infrastructures will hasten the transition to a zero-emission commercial vehicle future.

A well-crafted GHG Phase 3 rule will not only help achieve the Biden administration's ambitious carbon reduction goals, it also can help the needs of communities located near ports, depots, and warehouses that have historically suffered from the highest levels of pollution. Investing in ZEV infrastructure development in those areas will be especially important to accelerate targeted and localized clean air objectives.

EPA should establish a GHG Phase 3 standard that aligns with the development of the infrastructures necessary to ensure successful deployment of ZEVs. In doing so, the GHG Phase 3 rule can improve the health of our communities, transform commerce, and create hundreds of thousands of jobs.

EMA and its member companies are investing in and are committed to achieving a zero-emission future. We will work with EPA and the administration, and other essential stakeholders, throughout the GHG Phase 3 rulemaking process to ensure our goal for a nation powered by the cleanest possible commercial vehicles operating in every community becomes a reality.