

March 29, 2024

CONTACT:
press@emamail.org

Truck and Engine Manufacturers Association Response to EPA's Greenhouse Gas Phase 3 Rule

CHICAGO, IL - The Truck and Engine Manufacturers Association (EMA) today responded to the U.S. Environmental Protection Agency's (EPA) final rule on Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles – Phase 3 (GHG Phase 3) which requires that each manufacturer convert an annually increasing percentage of their total vehicle sales to zero-emission vehicles (ZEVs).

“EMA and its members are committed to a zero-emission future for the U.S. trucking industry, designing and building the heavy-duty ZEVs that can deliver that future,” said Jed R. Mandel, EMA's President. **“We all are working toward the same common goals and desired end results. To ultimately be successful in transitioning to a commercial vehicle ZEV future, all parties need to be better aligned on the realistic timing for delivering the products and infrastructures critical to achieving the successful outcome we all want. We will continue to work with EPA, the Department of Energy, the Department of Transportation, and all interested stakeholders to make the GHG Phase 3 rule successful.**

“However, it is important to note that uncertainties lie ahead. Long lead times and other actions beyond the control of the manufacturers, and beyond EPA's control, are needed to assure the infrastructures essential to operating heavy-duty ZEVs are in place, in time. EPA's final GHG Phase 3 rule works to erode near-term regulatory certainty and stability by reopening the existing 2027 GHG Phase 2 rule – a rule that we defended against rollbacks – and by assuming a level of ZEV purchasing that appears to be overly ambitious.

“We are concerned that the final rule will end up being the most challenging, costly and potentially disruptive heavy-duty emissions rule in history. Truck and engine manufacturers have a long and successful history of implementing previous EPA emissions regulations. Previous rules included stringent emissions standards that required manufacturers to comply by developing and implementing advanced technologies to improve engine and vehicle performance. The new GHG Phase 3 rule will require manufacturers to sell a set percentage of ZEVs, which is beyond their own ability to control.

“EMA's member companies are at the forefront of reducing GHG emissions and have invested billions of dollars to develop and bring to market heavy-duty ZEVs. Manufacturers have many heavy-duty ZEV models for sale today, with more coming available. Trucking fleets are sophisticated purchasers who demand a financial return on the capital they invest in new vehicles. They simply will not buy ZEVs in sufficient volume unless the total cost of ownership is competitive with traditional vehicles and, critically, adequate infrastructures are available to power them. Unfortunately, ZEVs currently cost significantly more than ultra-clean diesel trucks and the complicated battery-charging and hydrogen-fueling infrastructures needed for heavy-duty ZEVs are only in the earliest stages of planning.”

Heavy-duty ZEVs require different battery charging facilities and infrastructures than passenger ZEVs. There are only a small number of chargers available today that are suitable for heavy-duty ZEVs, significantly constraining the willingness of customers to purchase them. To meet the volume of heavy-duty ZEVs anticipated by the GHG Phase 3 rule, over one million chargers will need to be built by 2032, with adequate power supplied to each by the electricity grid. That requires installing and energizing more

than 9,500 heavy-duty ZEV chargers each month between now and 2032. Additionally, hydrogen-fueling stations will be needed along interstate highways for long-haul ZEVs.

Adequate battery-charging and hydrogen-fueling infrastructures must be in place before trucking fleets will purchase heavy-duty ZEVs. If fleets don't buy enough ZEVs to meet the percentages in the GHG Phase 3 rule, manufacturers will be forced to sell fewer ultra-clean diesel trucks to remain in compliance. That would lead to older, higher polluting trucks staying on the road longer -- causing negative economic consequences, job losses and harmful environmental impacts.

"EMA and its members will continue to invest in the further development of ZEV technologies and are committed to working with all interested stakeholders in developing the infrastructures needed to support ZEV technologies in the commercial vehicle and good movement sector," Mandel said.

More information about EMA's vision, policy positions, and advocacy efforts is available at www.cleantruckfacts.com.

#

The Truck and Engine Manufacturers Association (EMA) represents the world's leading manufacturers of medium-and heavy-duty commercial vehicles, internal combustion engines, and zero-emission powertrains. EMA works with governments and other stakeholders to help the nation achieve its goals of cleaner air and lower greenhouse gas emissions, and to ensure that regulatory standards are technology feasible, cost effective, and successful. By continually improving commercial vehicle and powertrain technologies, EMA's members are in the forefront of providing clean and efficient products that meet their customers' business needs and protect the environment.