

FACT SHEET:

Ensuring a Strong National Standard on NOx Emissions

The Truck and Engine Manufacturers Association (EMA) supports a strong national standard for nitrogen oxide (NOx) emissions for cleaner air and healthier communities. EMA supports the U.S. Environmental Protection Agency's (EPA) efforts to reduce NOx emissions from heavy-duty trucks in a way that is practical, technologically feasible, and cost-effective. We look forward to working with the EPA to help ensure the Clean Trucks Plan can achieve its desired outcomes.

What is the EPA's Clean Trucks Plan?

EMA has worked collaboratively with EPA for decades to achieve national environmental rules that have resulted in a more than 98% reduction in NO_X and particulate matter (PM) emissions from commercial vehicles. The "Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards" rule, which was proposed by EPA on March 7, 2022, as part of the Clean Trucks Plan, seeks to reduce much of the remaining 1-2% of NO_X emissions starting with new heavy-duty trucks sold in 2027. EPA intends to finalize the rule before the end of 2022 and is seeking public comment.

Why is a new standard for NO_X necessary?

NO_x can have harmful effects on human health, causing breathing problems and lung diseases, as well as environmental damage due to acid rain and smog. EMA has long advocated for an updated national NO_x standard because we are committed to cleaner air and healthier communities, and because a single nationwide standard is the most effective way to implement complicated new emissions control technologies – especially for products that operate in interstate commerce.

What is needed for a workable rule, and for environmental goals to be realized?

1. The new rule must facilitate fleet turnover. About half of the truck engines on the road today were manufactured before 2010, when EPA's most recent NO_X standard took full effect. Because trucks older than that (many of which are still on the road today) lack the most modern emissions control technologies, they could emit as much as 30 times more NO_X than post-2010 vehicles. To achieve the intended environmental and health objectives, EPA's proposed rule must result in lower-emitting engines that are affordable, reliable, durable, fuel efficient, and meet the needs of trucking companies. If the new NO_X rule is not compatible with those very real customer needs, fleets simply won't purchase the new EPA-compliant engines. As a result, higher-polluting engines will remain on

the road, and NO_x emissions reductions won't be achieved – disproportionately harming high-pollution communities near highways, ports, and truck routes.

- 2. The new rule must not divert industry investment in, and momentum toward, zero-emission vehicles. EPA's final rule must not allow the goal of NO_X emission reductions to impede progress toward total emissions *elimination*. Truck and powertrain manufacturers are investing billions in zero-emission technology, and a workable rule should substantially reduce NO_X emissions while also not impeding the transition to a zero-emission future. In addition to establishing a national NO_X rule as a bridge to the zero-emission future, EPA must help lead a comprehensive national strategy to invest in electric charging stations, hydrogen fuel development, and purchase incentives needed for the U.S. trucking industry to broadly embrace ZEVs.
- 3. The new rule must protect American manufacturing jobs. A successful rule will facilitate fleet turnover by ensuring that the newest, cleanest engines are an attractive investment for trucking companies. An unsuccessful rule will cause trucking companies to keep older trucks on the road longer, due to lack of affordability, fuel efficiency, reliability, durability, or performance of the new products. Not only will that lead to higher NO_X emissions, it also could result in job losses within the critical domestic truck and powertrain manufacturing industry that employs tens of thousands of Americans.

Is the EPA the right government agency to establish this standard?

Many states are interested in lowering NO_X emissions and in promoting the market for zero-emission vehicles. Rather than impose a patchwork based on one state's proposed pathway to lower emissions, EPA's national leadership is needed to facilitate a single, standardized final rule to reduce NO_X emissions that is implementable, cost-effective, and serves as a bridge to a zero-emission future for the U.S. trucking industry.

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The Truck and Engine Manufacturers Association (EMA) represents the world's leading manufacturers of internal combustion engines, zero-emission powertrains, and on-highway medium- and heavy-duty trucks. EMA works with government, industry, and other stakeholders to help the nation achieve its goals of cleaner air, slowing climate change, and improving highway safety. EMA strives for environmental and safety standards and regulations that are technologically feasible cost-effective, and that provide safety and environmental benefits. Through continuing improvements in truck and powertrain technology, emissions control, and safety systems, EMA's member companies are the leaders in providing efficient, clean, and safe commercial vehicles that both enhance environmental protection and the safety of the nation's transportation system.