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What They're Saying: EPA Truck Emissions Rule May Not be Technologically Feasible
Industry leaders warn proposed rule includes requirements that are not realistic

CHICAGO, IL – Industry leaders are sounding alarm bells over the feasibility of developing technologies that can meet stringent new NO_x emission standards proposed by the U.S. Environmental Protection Agency – and the potential for unintended negative consequences on commercial vehicle cost and durability.

EPA has put forth two potential rulemaking pathways to further reduce truck emissions. In dozens of [comment letters](#) on the proposal rule, manufacturers and other industry experts expressed serious concerns about whether it is scientifically possible to achieve the standards proposed in EPA's more stringent "Option 1." Read a summary of the proposed rule [here](#).

In [official comments](#) to the EPA, the Truck and Engine Manufacturers Association noted that "EPA's assumption that its proposed Option 1 standards and requirements are fully feasible is a fallacy. Moreover, that fallacy is premised on only one set of data — in some instances just one data point — from one still-evolving prototype engine used in one not-fully-successful experiment ... a rulemaking of this magnitude based on such scant data and such fallacious assumptions will not stand. Instead, an Option 2-like program will need to serve as the foundation for a sustainable final rule."

Here's what others are saying about the technological infeasibility of Option 1:

- "Worldwide Equipment's opposition to the Proposed Rule is due to several reasons. The first, and primary, reason is that the new requirements within Option #1 are technologically infeasible and, therefore, not realistic." – [Worldwide Equipment Enterprises](#)
- "Issuing a rule that is technologically infeasible and increases acquisition costs such that it forces fleets to delay the turnover of their oldest trucks will not help the environment." – [NTEA: The Association for the Work Truck Industry](#)
- "TCA is disappointed with the proposed standards put forth by the EPA because the measure does not fully appreciate current market and technology constraints within the trucking industry." – [Truckload Carriers Association](#)
- "EPA claims that longer useful life periods will result in more durable emission control related components that, combined with longer warranty periods, could reduce repair costs for new CMV purchasers. EPA also suggests that these combined effects may increase new CMV sales ... ATD disagrees and instead concurs with the position taken by EMA that the

higher costs associated with unreasonably longer useful life mandates would undermine the technological feasibility of a revised NOx rule.” – [American Truck Dealers](#)

- “In terms of technological feasibility, based on discussions with engine manufacturers and by reviewing prior submissions to the California Air Resources Board (CARB) Omnibus rulemaking, ABA is concerned about the technological feasibility of the Proposal, particularly with regard to EPA’s favored Option 1.” – [American Bus Association](#)

The commercial vehicles impacted by this rulemaking are responsible for [carrying nearly all](#) the goods consumed in the United States — they are the waste and recycling trucks, school and city transit buses, concrete mixers, electrical utility vehicles, and food and package delivery trucks that serve our communities each and every day. A final rule that is not technologically feasible and results in expensive and unreliable vehicles will compel fleet owners to avoid purchasing newer, cleaner trucks and hold on to their older, higher-emitting vehicles longer, [slowing progress toward shared clean air goals](#). The stakes could not be higher. EPA must look to Option 2 to provide the foundation for a cost-effective, workable, and implementable final rule.

To learn more about the rulemaking, read the latest research and insights from industry leaders, and sign up for updates on the rulemaking process, visit www.cleantruckfacts.org.

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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.