

EMA Statement in Opposition to State and Regional Agencies Implementation of Alternative Fuel Mandates

The Truck and Engine Manufacturers Association (EMA) believes that state and regional agencies should not implement alternative fuel mandates that limit vehicle or equipment operators' access to the fuels they need. One such mandate is the Minnesota requirement, starting May 2018, that would require all diesel fuel sold in the summer months contain 20% biodiesel (B20). While some engine manufacturers have approved B20 for some specific engines, that certainly is not the case for all diesels operating in Minnesota. Instead of implementing alternative fuel mandates, state and regional agencies should work with the U.S. Environmental Protection Agency (EPA) which has been engaged with EMA and its members to implement viable alternative fuel property requirements at the national level.

EMA represents the world's leading manufacturers of on-highway and nonroad internal combustion engines and on-highway medium- and heavy-duty trucks. EMA works with government and industry to help the nation achieve its goals of cleaner air and safer highways, and to ensure that environmental and safety standards are technologically feasible and cost-effective. Through continuing improvements in engine technology, emission controls and safety systems, EMA's members remain the leaders in providing efficient engine power and safer vehicles that both enhance environmental protection and public safety.

EMA's members need, and rely on, consistent nationwide fuel-property requirements in order to continue to design and produce reliable engines to meet their customers' diverse needs. That is especially true in the heavy-duty engine sector, since those engines are almost exclusively used for commercial purposes. Alternative fuel mandates that could result in premature engine obsolescence or increased downtime, maintenance and repairs are extremely detrimental to businesses that rely on commercial engines for their livelihood. In addition, and just as important, alternative fuel mandates remove the vehicle owner's freedom of choice and unilaterally impose unwanted costs and burdens. As a result of such mandates, some vehicle or equipment operators could be forced to either violate their engine manufacturer's recommendations and warranties, or be prevented from using their vehicles or equipment altogether. If and when a vehicle owner makes the decision to operate his or her vehicle on alternative fuels, the vehicle owner essentially makes a business decision to operate the vehicle on a fuel that may compromise the longevity or performance of the engine and that may require more frequent maintenance. That is a choice the owner makes, on their own. However, when the use of an alternative fuel is mandated, the vehicle owner loses the freedom of choice and the adverse consequences associated with using the alternative fuel are imposed upon the owner, without consent.

Accordingly, EMA and its members urge state and regional agencies interested in improving fuel properties to work and harmonize with EPA, which, through its Renewable Fuels Standard (RFS), is actively engaged in the review and potential revision of fuel property requirements at the national level. EMA and its members are collaborating in those efforts and can help ensure that revisions to fuel properties will not force vehicle or equipment operators to violate warranties and recommendations, or to abandon using their products altogether.

January 2018