



Motor & Equipment Manufacturers Association Testimony
U.S. Environmental Protection Agency Public Hearing on the Proposed Rule:
“Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards”
Docket No. EPA-HQ-OAR-2019-0055
April 12-14, 2022

I am Brian Daugherty, chief technology officer at the Motor & Equipment Manufacturers Association (MEMA). MEMA represents more than 900 motor vehicle supplier companies, and we are the largest sector of manufacturing jobs in the U.S.

MEMA supports a NOx rule that relies on certification cycles and in-use testing that better represent real-world use and will encourage best-in-class technology adoption while effectively providing lower NOx emissions requirements. MEMA opposes the alternate option as it could harm suppliers, places unnecessary strain on the industry, and lacks research and technical support. MEMA will provide greater detail in written comments.

MEMA urges EPA reduce the proposed warranty requirements and full useful life timelines for all vehicles. The warranty increases of a factor of four or more are based on specific and limited laboratory testing that does not reflect complex, real-world usage. Additionally, more data and analysis of second and third vehicle owner usage should be conducted before proposing longer warranties. Furthermore, EPA should consider increasing the compliance margins for in-use standards.

Most of the agency’s laboratory work concentrated on aftertreatment aging rather than full engine aging. As a result, data regarding the impact of engine aging on components such as exhaust gas recirculation, camshafts, fuel injectors, turbochargers, piston rings, sensors, and electronics is lacking.

Longer warranties on criteria emissions systems put unknown and potentially massive risks on the motor vehicle parts manufacturing industry, which could result in significant price increases on vehicles.

EPA’s envisioned increases in warranties and full useful life requirements on vocational vehicles are less validated than other commercial vehicles, with little to no testing and verification conducted on these uses. The real-world uses for heavy-duty vocational vehicles are different and extremely complex because of the vast range of duty cycles, load configurations, and application demands.

Additionally, MEMA recommends EPA not require warranty coverage on parts that have a shorter life and are routinely replaced due to wear, such as sensors, injectors, rings, filters, and valves. Instead, such parts and components should be defined as standard maintenance or replacement items. We urge EPA to work with industry stakeholders, including suppliers, to develop a list of wear parts and components with these criteria in mind.

MEMA encourages EPA to not issue NOx credits for battery electric vehicles or fuel cell electric vehicles to avoid unintended backsliding and lowering of technology deployment in ICEs.

Thank you for your time today and consideration of these comments.

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