



Statement of the
Motor & Equipment Manufacturers Association (MEMA)
before the
U.S. Environmental Protection Agency (EPA)
RE: Notice of Proposed Rulemaking; Revised 2023 and Later Model Year
Light-Duty Vehicle Greenhouse Gas Emissions Standards
Docket No. EPA-HQ-OAR-2021-0208
August 26, 2021

MEMA¹ represents more than 1,000 companies that manufacture components, systems, and materials for the light- and heavy-duty vehicle original equipment and aftermarket industries. The motor vehicle supplier parts industry is the nation’s largest sector of manufacturing jobs – directly employing more than 907,000 workers in all 50 states.²

Suppliers are responsible for providing 77 percent of the value of a new vehicle, including a wide range of technologies and products such as the complex, highly integrated systems to reduce emissions and make vehicles more efficient.

MEMA supports working towards a net-zero carbon transportation future. Suppliers are committed to providing innovative, affordable, and accessible technologies needed to continue reducing vehicle emissions and meet the administration’s goal of economy-wide net-zero emissions by 2050.

Motor vehicle suppliers have taken a leadership position and the substantial associated risk in investing significant resources in developing multiple emissions-reducing technology solutions, including electrified powertrains, to assist vehicle manufacturers in meeting these important greenhouse gas (GHG) emissions standards. Suppliers lead the industry’s research, development, and deployment of these advanced technologies.

Consequently, MEMA supports vehicle GHG standards through model year (MY) 2026 that are stringent but realistic and provide the needed regulatory certainty and stability for the industry. We continue to support the goal of a One National Program as much as possible between EPA, NHTSA and the State of California.

Furthermore, MEMA supports EPA’s approach of performance-based standards that allow a broad spectrum of advanced propulsion technologies. The 2023-2026 framework encourages a

¹ MEMA represents its member companies via the Automotive Aftermarket Suppliers Association (AASA); Heavy Duty Manufacturers Association (HDMA); MERA – The Association for Sustainable Manufacturing; and, Original Equipment Suppliers Association (OESA). For more information, visit <http://www.mema.org>.

² [U.S. Labor and Economic Impact of Vehicle Supplier Industry](#), MEMA and IHS Markit. February 2021.

wide range of electrification technologies while also requiring further technology advances and innovation to internal combustion engine technologies. This approach will sustain long-term supplier investments.

MEMA supports expanding the off-cycle technology credit program and increasing the credit cap on the credits received through the off-cycle menu. The off-cycle program along with the air-conditioning (A/C) efficiency credit program are important as they recognize technologies that achieve real-world GHG emission reductions. An expansion of the off-cycle credit program is critical in encouraging innovative technologies that allow a broader, more creative, and cost-efficient range of technology options for meeting the standards.

Looking beyond MY 2026, MEMA stands ready to work with EPA to establish a holistic framework for long-term GHG standards that are ambitious but pragmatic. Motor vehicle suppliers will continue to support a transition to cleaner transportation. MEMA is committed to a shift towards significantly higher levels of electrification while continuing to leverage American innovation to drive us toward a broad spectrum of advanced technologies that can all play a part in meeting the nation's goals.

As we transition toward a cleaner future, diverse advanced propulsion technologies will help maintain the appropriate balance between consumer choice, vehicle affordability, and strengthening the American workforce.

MEMA urges policymakers at all levels to ensure there is an overall comprehensive plan to prepare the industry and the U.S. for this advanced transportation future. A strategic plan should include both supply- and demand-side policies that will help accelerate the development, manufacture, deployment, and purchase of these advanced technologies. These policies include consumer purchase incentives of electric and fuel cell vehicles, investments in electric and fuel cell vehicle charging and refueling infrastructure, and investments and incentives for the research, development, and manufacturing of a range of advanced technologies.

Suppliers strongly support investments to further develop our skilled workforce, including training to upskill workers, as these development needs are evolving with the transition to vehicle electrification. MEMA also strongly supports investments to strengthen the U.S. manufacturing supply chain. Again, vehicle suppliers take a leadership position and significant risk in planning these advanced technologies years in advance of deployment. Cohesive complementary policies are essential to support vehicle suppliers and advance the industry's innovation and the nation's GHG goals.

MEMA appreciates consideration of these comments.

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