



**Jennifer A. Lewis, Vice President, Regulatory Affairs**  
**MEMA, The Vehicle Suppliers Association – August 21, 2025**  
**Public Hearing for Reconsideration of 2009 Endangerment Finding and**  
**Greenhouse Gas Vehicle Standards**  
**Docket ID No. EPA-HQ-OAR-2025-0194**

**INTRODUCTION**

Good afternoon. My name is Jennifer Lewis, and I am the Vice President of Regulatory Affairs for MEMA, The Vehicle Suppliers Association.

MEMA represents more than 1000 vehicle supplier companies across the U.S., including original equipment and aftermarket suppliers for light-, medium-, and heavy-duty vehicles. Our members form the largest manufacturing sector in the country, employing over 900,000 Americans directly and supporting more than 4.8 million jobs in related industries. My remarks today highlight three critical areas where suppliers will be impacted by EPA's proposal.

**1. R&D Investments and Potential Losses.** The mobility sector is a major source of foreign direct investment in the U.S., upwards of \$195.6 billion in 2023. For more than 15 years, MEMA members have invested in research, development, and advanced manufacturing capacity to meet or exceed existing Green House Gas standards. These technologies are now complete and ready to be used for compliance; and eliminating the regulatory framework and associated credit mechanisms will lead to stranded investments.

**2. Supply Chain Stability and U.S. Jobs.** The supplier sector depends on long-term regulatory stability and consistency to guide capital investments and workforce planning. Uncertainty in emissions regulations could detract further investment, facility buildouts, and job creation.

**3. Erosion of Global Competitiveness.** MEMA's members not only manufacture products for the U.S. but compete globally in markets with existing emissions standards. Recent reports from the International Trade Commission cite increased investment in U.S. automotive manufacturing, with the U.S. being the primary recipient in the USMCA region. If U.S. policy diverges sharply from global norms, U.S. suppliers may fall behind and become "out innovated" by foreign competitors building to stricter global standards. MEMA does not want to see the U.S. become a manufacturing "island."



The Vehicle Suppliers Association

We are committed to work with EPA on solutions that provide consumers with choice, keep the U.S. supplier base competitive globally, and ensure that MEMA's past and future investments in innovation continue to benefit the market, the workforce, and the U.S. economy.

Thank you for the opportunity to share our perspective today, we look forward to discussing more in our written comments.