

MECA's Comments to Federal Highway Administration on CMAQ Buy America Waiver

The Manufacturers of Emission Controls Association (MECA) represents 44 North American companies that manufacture emission control technologies for mobile sources including the majority of diesel retrofit manufacturers. MECA member companies provide the advanced emission control devices that are used by air pollution non-attainment areas to achieve the goals of the CMAQ program. MECA supports this waiver request for all manufactured vehicle, equipment and emissions control diesel retrofit products purchased under the CMAQ program.

Emission control retrofit devices such as Verified Diesel Emission Control Systems (VDECS) are highly specialized and complex technologies made up of components that are often sourced from a single supplier. These include advanced catalysts and particulate filters as well as sophisticated electronic controls. In some of these devices a steel rather than ceramic substrate is required to support the catalyst that is the functional component within the VDECS. These verified products are required under EPA and CARB verification to employ specific components, which are sourced from key suppliers in the global automotive parts industry.

The steel employed in some components (ie. electronic controls, catalysts, switches, housings, etc.) are manufactured where specific expertise exists. Certain Buy America requirements fail to recognize the U.S. origin of employed steel if any fabrication occurs outside the US. It is not possible to guarantee that all steel components and steel related processes will be performed in the United States for such specialized advanced technology devices.

All of the manufactured products and components sourced by our industry create value that supports US based manufacturing wages. Our industry supports over 65,000 U.S. manufacturing and service jobs in the U.S. Failure to provide waivers for these technologically advanced manufactured products will result in employment losses in the green technology companies such as diesel retrofit manufacturers and their US based suppliers. Furthermore, it will hinder the clean air objectives of the CMAQ program resulting in continued poor air quality for Americans.

MECA believes that it is essential that waivers be granted to for all manufactured vehicle, equipment and emissions control retrofit products purchased under the CMAQ program.