

**STATEMENT OF THE
MANUFACTURERS OF EMISSION CONTROLS ASSOCIATION
ON EPA'S PROPOSED RULE ON REVISED 2023 AND LATER MODEL YEAR
LIGHT-DUTY VEHICLE GREENHOUSE GAS EMISSION STANDARDS**

August 25, 2021

Good morning, I am Rasto Brezny, the Executive Director for the Manufacturers of Emission Controls Association. We will submit more detailed comments in writing, but today I would like to speak on a few specific aspects relevant to EPA's revision of these standards.

MECA is a non-profit association of the world's leading manufacturers of clean vehicle technology including emission control, engine efficiency and the full complement of electrified and electric propulsion technologies. Our economy has benefited in the hundreds of thousands of jobs among clean technology suppliers who have located plants here in the US to respond to the need established by environmental standards. MECA members are commercializing the technologies needed to meet the administration's goal of transitioning transportation to a net-zero emissions future.

Over the past 50 years, the most stringent standards in the US have provided domestic suppliers with a competitive advantage through the early adoption and optimization of technologies on vehicles. The original 2012 GHG standards allowed suppliers to rapidly introduce new technologies to the market. Just a few years later, when EPA conducted their mid-term review, the pace and breadth of technology options for compliance grew and the cost reduced beyond the agency's initial projections. The recent weakening of GHG standards in 2018 have left many of these technologies on the shelf and put the US behind other strong auto manufacturing regions like Europe and China where CO₂ standards have continued to tightened. It is no surprise that suppliers invest where the standards demand their technologies.

Therefore, MECA supports EPA's reconsideration of the light-duty GHG standards out to 2026 and further consideration of standards for MY2027 and beyond. Our members depend on long term regulatory certainty to justify their investments that will allow the US to meet our national climate objectives and ensure that our technology suppliers remain globally competitive.

We agree with staff's conclusion that the majority of the improvements out to 2026 are achievable through broader deployment of existing technologies already available for combustion engines and vehicles with electrified powertrains. Performance based regulations are a proven method for meeting environmental goals through a diversity of technology solutions.

MECA supports EPA's continuation of the off-cycle credit program with a higher credit cap in order to provide the benefit of verifiable, GHG emission reductions by all technological means. We encourage EPA to continue to improve and expand the off-cycle program by sharing data and resources with NHTSA and CARB as well as adding a supplier-initiated process for conditional credits like that included in the California framework.

Thank you for this opportunity to speak today and I am happy to answer any questions.

CONTACT: Dr. Rasto Brezny, Executive Director MECA, E-mail: rbrezny@meca.org