

MECA Recommendations for the Successful Implementation of New Aftermarket Converter Regulations

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The Manufacturers of Emission Controls Association (MECA) strongly supports the adoption of stringent aftermarket converter emission regulations consistent with the capabilities of the most advanced three-way catalyst technology. MECA believes that significant emission reductions in NO_x, CO, and hydrocarbons are achievable by strengthening the requirements of the federal aftermarket converter exemption policy. We have supported the U.S. EPA's efforts in their review of their 1986 aftermarket converter program. MECA continues to believe that a more stringent federal aftermarket converter policy is the most effective approach toward cleaning up the fleet of in-use light-duty vehicles. This will eliminate the complexity of enforcing on out-of-state vehicles or illegal converters installed in neighboring states that may have different requirements. A federal policy would make available the most advanced aftermarket technology for federally certified vehicles that are not covered by existing CARB Executive Orders. Some states that have adopted California's light-duty vehicle program have decided to take advantage of the emission benefits offered by California's aftermarket program and have adopted the 2009 Title 13 Code of California Regulations, Article 2, Section 2222 regulations for Add-On Parts and Modified Parts into their state code of regulations. As part of the emissions benefit analysis that states complete to justify adopting California's aftermarket converter standards, consideration should be given to the specific make-up of the state's vehicle fleet and the vehicle coverage by CARB-exempted aftermarket converters. MECA members' analysis has shown that the aftermarket converter coverage of vehicles is lower for California-exempted converters than for existing federal converters.

Based on the experience gained through working with states that have already adopted CARB aftermarket converter regulations, MECA has identified a number of issues with implementing a CARB aftermarket converter regulation in the absence of resources that California has committed to the program. A number of critical steps exist in rolling-out new aftermarket converter regulations in order to effectively implement the new requirements. Just

as with new vehicle regulations, in order to facilitate a smooth transition, aftermarket converter manufacturers require sufficient lead-time to comply with new requirements to insure that parts are available and that outreach to consumers, distributors, and installers is completed. MECA recommends that the following issues be considered when establishing implementation dates for new aftermarket converter regulations to allow for an adequate transition period. MECA members would like to work with state regulatory agencies to facilitate this process.

Prior to the effective implementation date for new aftermarket converter requirements, manufacturers will need to:

- Quantify and analyze the vehicle fleet population and engine families in the state.
- Consider the practices of the vehicle repair industry in the state to insure the right mix of universal fit converters or direct fit exhaust assemblies are available in distributors' warehouses prior to the implementation date.
- Manufacture additional product inventory appropriate for the region.
- Procure a storage facility for new inventory and prepare for the smooth exchange of inventory once the regulation goes into effect.
- Develop specific aftermarket converter information tailored to the vehicle mix and model years covered by California regulations.
- Communicate the regulatory changes throughout the distribution and installation network and educate the supply chain on the new requirements.

MECA would like to work with state agencies on the following areas to insure the long term success of the program:

- Enforcement of the new regulation to maintain a level playing field in the market.
- Prepare a regulatory summary, in the form of a fact sheet, to clearly describe the key aspects of the regulation. This information should be distributed to the registered converter installers, distributors, retailers, and vehicle owners in the state or region.
- Conduct workshops to address questions about the regulation and address implementation issues in preparation for a smooth transition.

MECA believes that a regulatory transition requires thoughtful planning and careful execution in order to minimize confusion and frustration by consumers and installers with regulatory changes. Once implemented, enforcement of the regulation is essential to achieve the full emissions benefit of the program. We request the state's consideration of the above issues when setting implementation dates for new aftermarket converter requirements. MECA members look forward to working with the appropriate agencies and all stakeholders to insure a smooth regulatory transition and successful enforcement of new aftermarket converter requirements.

Please feel free to contact MECA's Rasto Brezny (rbrezny@meca.org) with any questions that you might have.