



Manufacturers of Emission Controls Association
2101 Wilson Boulevard, Suite 530
Arlington, VA 22201
(202) 296-4797

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Secretary María Luisa Albores González
Secretaría de Medio Ambiente y Recursos Naturales
Av. Ejército Nacional 223, Col. Anáhuac,
Miguel Hidalgo, C.P. 11320, Ciudad de México. México

Dear Secretary Albores González,

RE: Proposed Implementation Delay of Mexico's Emission Standards for Heavy-Duty Diesel Engines and Vehicles (NOM-044-SEMARNAT-14OCT2021)

The Manufacturers of Emission Controls Association (MECA) is writing to urge you not to allow an additional three-year delay in the implementation of NOM-044 heavy-duty engine and vehicle emission standards.

MECA is a non-profit association of the world's leading manufacturers of emission control technology for mobile sources. Our member companies have over 50 years of experience and a proven track record in developing and manufacturing emission control technology for a wide variety of on-road and off-road vehicles and equipment, including extensive experience in developing emission controls for gasoline and diesel engines and vehicles in all world markets. Our industry has played an important role in the emissions success story associated with mobile sources globally, and has continually supported efforts to develop innovative, technology-forcing, emissions programs to deal with air quality problems. The emissions control industry has a significant economic footprint in North America, employing in excess of 70,000 professionals in research, product development, manufacturing, and customer support. MECA member manufacturing facilities include operations in Mexico.

Implementing the NOM-44 standards for new heavy-duty diesel engines and vehicles will provide significant and immediate economic, climate change and health benefits for the citizens of Mexico. These heavy-duty diesel engine and vehicle emission standards build on the extensive, successful experience controlling diesel particulate and NOx emissions that spans more than 15 years in the major vehicle markets of the United States, Canada, Europe, China and Japan. The combination of diesel particulate filter (DPF) and selective catalytic reduction (SCR) technologies have now been used on over 5.4 million diesel engine equipped vehicles in the U.S. since 2010 and now represent 49% of all commercial highway vehicles. This has resulted in the prevention of over 27 million tonnes of NOx and 202 million tonnes of CO₂. Similar health benefits have also been derived from the millions of DPF and SCR systems that have been deployed under EU VI standards since 2013 and China VI standards since 2019.

In addition, as shown in the Advanced Collaborative Emission Study (reports available from the Coordinating Research Council (CRC) website: [Phase 1 report](#) and [Phase 2 report](#)), the use of DPF's reduce emissions of polycyclic-aromatic hydrocarbons (PAHs), dioxins and other potential genotoxic compounds by 80 percent or more.

MECA is concerned that a further 3-year delay of NOM-44 standards will needlessly postpone significant air quality and health benefits in Mexico and hinder Mexico's domestic and international climate commitments. MECA believes that the NOM-44 standards can be safely implemented without the need for 100% of fuel meeting 15 ppm sulfur limits. It is our understanding that excellent progress has been made in Mexico that presently 85% of the diesel fuel sold in Mexico already meets the 15 ppm sulfur limits. MECA would highlight that the U.S. implemented US2010 HD diesel standards when only 75% of U.S. fuel met the same 15 ppm standard. The U.S. experience strongly supports that Mexico is in a superior position to require that new diesel vehicles in Mexico comply the NOM-44 standards now.

Further, MECA would highlight that manufacturing facilities in Mexico have exported about 80% of their produced trucks and buses to the U.S. and Canada for more than a decade. This domestic manufacturing capability emphasizes that the needed supply chains to produce NOM-044 compliant trucks are already well established within Mexico. Any delay in these standards will have an adverse impact on the manufacturing investments that have been made by emission control suppliers in Mexico to support harmonized standards.

In closing, MECA strongly encourages SEMARNAT to continue their efforts to harmonize Mexico's mobile source emission regulations with those in place in the United States and Canada (e.g., light-duty 3 emission standards, nonroad Tier 4 standards, light-duty and heavy-duty vehicle greenhouse gas regulations).

Sincerely,



Dr. Rasto Brezny
Executive Director
Manufacturers of Emission Controls Association (MECA)
www.meca.org
Tel.: (202) 296-4797 x106
E-mail: rbrezny@meca.org