

# TESTIMONY



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## **MECA STATEMENT ON THE PROPOSED AMENDMENTS TO THE CALIFORNIA OMNIBUS REGULATION FOR MODEL YEARS 2024-2026**

Good morning, I am Kevin Brown with MECA Clean Mobility.

For nearly 50 years, MECA has been the trade association representing leading suppliers of clean mobility technologies. From clean combustion to electrification, our members invest in jobs, manufacturing capacity and innovation to develop and commercialize emission control, efficiency, and electric technologies for a wide variety of on- and off-road vehicles and equipment in all world markets.

MECA supports the Executive Officer's proposed amendments to the heavy-duty engine and vehicle Omnibus Regulation for model years 2024 to 2026. We recognize the need for lead time to test and certify engines to new standards, and we understand the need for fleets to have available vehicles to continue to operate their business.

MECA has worked with CARB and others at Southwest Research Institute to demonstrate that the MY 2024 FTP standards can be met with improved calibrations applied to current aftertreatment architectures. The underlying need for these amendments lie with the compressed implementation timeline faced by engine manufacturers and not the availability of technology.

Emission control suppliers have made investments to deliver the technologies to meet the model year 2024 standards and these amendments significantly reduce the rate of return on these investments.

Although we support the assurance that these amendments will not lead to an increase in NOx emissions, we are concerned with the precedent and associated risks of trading

mobile source regulatory compliance with supplemental emissions projects once rules are finalized.

Most importantly, MECA urges CARB to move forward as quickly as possible to finalize the adoption of subsequent amendments to align 2027 and later model year requirements with EPA's Clean Truck Rule to ensure the timeline to introduce these engines is retained.

In closing, our industry remains committed to working with CARB on the challenges and opportunities that lie ahead to achieve the goals of the Omnibus regulation. Thank you for your time and I am happy to answer any questions that you might have.