

# TESTIMONY



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## **MECA Oral Testimony at the US EPA Public Hearing on the “Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards” Docket No. EPA-HQ-OAR-2025-0194**

Good morning, I am Michael Geller, Deputy Director for the Manufacturers of Emission Controls Association. For nearly 50 years, MECA has been the trade association representing leading suppliers of clean mobility technologies. Our members have a proven track record in developing and commercializing emission control and efficiency technologies for a wide variety of on- and off-road vehicles and equipment in all world markets, offering cost savings to consumers and health benefits to all Americans.

I'd like to start by saying we support EPA's decision not to reconsider but rather maintain standards for criteria pollutants, including PM, NOx, HC and CO, in this proposal. The record supports that the criteria pollutant standards are achievable without relying on EVs and yield consumer savings and air quality benefits that are multiple times the nominal per vehicle costs. We urge EPA to continue to leave these standards in place.

Clean mobility suppliers represent nearly 300,000 North American jobs building the technologies that reduce emissions and improve the fuel economy of vehicles. Our industry generates hundreds of billions of dollars for the U.S. economy. Furthermore, suppliers invest billions of dollars each year in technological innovation that gets exported around the world. Our industry has grown in response to technologically feasible and cost-effective environmental regulations. Historical GHG standards have catalyzed investments by our industry. Thus, the existing regulatory framework can most effectively support competitiveness of US manufacturing and regulatory stability, on which suppliers rely to make investments and create jobs.

Based on the above rationale, MECA suggests that EPA consider the following alternatives:

1. Consider setting GHG standards to a level that continues to incentivize technology innovation and U.S. industry competitiveness in a global market; and
2. Consider allowing all powertrain technologies to compete on a level playing field based on life cycle accounting of emissions rather than tailpipe-only standards, enabling innovation across internal combustion, hybrid, and electric platforms.

Our industry remains committed to working with EPA as you work to finalize this regulation. Thank you for this opportunity to comment and I'm happy to answer any questions.