

TESTIMONY



2101 Wilson Boulevard | Suite 530 | Arlington, VA 22201 • 202.296.4797 • meca.org

July 29, 2026

**MECA Oral Testimony at the US EPA Public Hearing on the
“Amendments and Nonconformance Penalties for Model Year 2027 and Later Heavy-Duty
Highway Engines and Amendments to Inducement Provisions for SCR-Equipped Diesel Engines”
Docket No. EPA-HQ-OAR-2026-0728**

Good afternoon, I am Michael Geller, Executive Director for the Manufacturers of Emission Controls Association. For 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. Specific to heavy-duty engines regulated by this action, MECA members have made hundreds of millions of dollars in investments and have been working with their OEM customers to integrate established selective catalytic reduction, diesel particulate filter and thermal management technologies on trucks well ahead of the 2027 implementation date.

Clean mobility suppliers represent nearly 400,000 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, technology suppliers invest billions of dollars each year in innovation that gets exported around the world. Our industry has grown in response to feasible and cost-effective environmental regulations. Retention of these standards

protects thousands of jobs and hundreds of millions of dollars in financial investments made by our industry while providing significant health benefits to Americans.

MECA is currently reviewing the proposal, and we will submit detailed written comments to the docket. During this hearing, we would like to provide the following initial feedback. First, MECA supports EPA's decision to retain the NOx limits and new test cycles that will begin implementation with model year 2027. The record shows that commercially available technologies have been extensively proven in several demonstration programs over the past 10 years to meet the model year 2027 heavy-duty low NOx limits. This is evidenced by the announcements by all major heavy-duty engine and vehicle manufacturers that they will release compliant products next year.

We agree with EPA's decision to keep today's minimum warranty requirements of 100,000 miles or 5 years, as this will address the cost concerns of fleets that operate these trucks for their business. Any fleets wanting longer warranties will still have the option to purchase extended warranties that continue to be offered by OEMs.

MECA requests that EPA review and provide for public comment current manufacturer credit banks along with an analysis of the impacts of the various compliance flexibilities in this proposal, such as the design and projected use of nonconformance penalties along with credit policies offered in the original rule. This information is necessary for our members to understand the impacts to our industry and more broadly to ensure that the rule's benefits are not eroded.

MECA looks forward to working with EPA as you finalize this rulemaking. Thank you for holding this hearing and the opportunity to comment and we will submit written comments to the docket.