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THE MANUFACTURERS OF EMISSION CONTROLS ASSOCIATION COMMENTS ON THE CANADIAN VEHICLE AND ENGINE EMISSION REGULATIONS DRAFT NOTICE AND GUIDANCE FOR INTERIM COMPLIANCE DATED JUNE 29, 2026

The Manufacturers of Emission Controls Association (MECA) appreciates the opportunity to provide comments on Canada's draft interim guidance and conveys its support regarding the importance of greenhouse gas emissions. We continue to support progressive technology neutral greenhouse gas standards for engines and vehicles rather than mandating any single technology because we believe this results in a more resilient and sustainable solution furthering emission reduction goals.

MECA supports progressive, technology neutral and stable emissions regulations for engines and motor vehicles as well as the goal of Canadian and American vehicle criteria pollutant and greenhouse gas standards alignment to facilitate a common North American market for engine and vehicle manufacturers. Given recent U.S. actions to reconsider engine and vehicle emission standards, MECA recognizes the potential for Canada to face challenges in ensuring regulatory compliance and meeting anticipated air quality and climate goals.

For your review, MECA has included our detailed specific comments submitted to the U.S. EPA on its two recent proposed amendments, including;

i) proposed 2-year delay in Tier 4 light-duty criteria pollutant standards[1] and
ii) proposed amendments and nonconformance penalties for model year 2027 and later heavy-duty highway engines[2] for your consideration.

[1] https://www.meca.org/meca-comments-on-proposed-revision-of-tier-4-criteria-pollutant-standards/
[2] https://www.meca.org/meca-comments-on-the-us-epas-proposed-rulemaking-amendments-and-noncomformance-penalties-for-my27-and-later-heavy-duty-highway-engines-and-amendments-to-inducement-provisions-for-scr-equipped-diese/

MECA Background

MECA is a non-profit industry association of the world's leading manufacturers of technologies for clean mobility. For over 50 years, MECA members have established a proven track record in developing and manufacturing emission control, engine efficiency, and propulsion components for all mobile sources in all world markets. Our industry has played a critical role in the environmental success story associated with light-, medium- and heavy-duty vehicles and has continually supported efforts to develop innovative, technology advancing, emission reduction programs to improve ambient air quality while simultaneously yielding fuel savings to consumers.

MECA members are a part of the clean mobility supplier industry that employs over 400,000 North American skilled workers building the technologies that reduce emissions and improve the fuel economy of on-road and non-road vehicles and equipment. Suppliers create two-thirds to three-quarters of all automotive jobs in North America and continue to grow and add more jobs in response to necessary and well-designed air quality policies and regulations. In addition, clean mobility technology manufacturers invest billions of dollars each year in developing the technologies that reduce emissions from mobile sources.

U.S. EPA Proposed Amendments to the Phase-In Schedule for Light and Medium-Duty Vehicles

MECA supports the Tier 4 standards that become effective for MY 2027 for both light- and medium-duty vehicles, and we do not believe the U.S. EPA's proposed 2-year delay of MY2027 Tier 4 standards (Part 1) achieves the goals of greater flexibility for industry, increased vehicle choice or lower vehicle cost for consumers. MECA remains concerned that the U.S. EPA's forthcoming Tier 4 Part 2 amendments will needlessly cause further instability and financial losses for the automotive industry and its suppliers.

Automotive technology suppliers rely upon regulatory stability and market predictability. Sudden delays and changes to standards can strand billions of dollars invested in developing and manufacturing the technologies to allow vehicles to comply with the 2027 and 2028 phased-in standards and risk the associated jobs. Model year 2027 vehicles are already on the assembly line, and 2028 vehicles have already been designed and the associated supply chain secured, making a two-year delay unnecessary.

The record supports that the criteria pollutant standards for model year 2027 and 2028 vehicles are achievable without relying on EVs and those model years have already been designed and sourced. Furthermore, vehicles that weigh over 6000 lbs, representing some of the more challenging applications, have until 2030 to comply with Tier 4 standards. Therefore, we believe that there is no need to delay implementation of the 2027-2028 requirements.

COMMENT: MECA advises that Canada should, at a minimum, take steps to ensure that light and medium-duty vehicle manufacturers' new MY2027 and MY2028 vehicles do not present emissions technology de-contenting or emissions backsliding.

MECA provides a copy of its comments[1] on the U.S. EPA Proposed Revision of Tier 4 Criteria Pollutant Standards, Part 1 for your information and consideration.

U.S. Proposed Amendments to MY2027 Heavy-Duty Engine Standards, Nonconformance Penalties and SCR Inducement Provisions

MECA believes that the heavy-duty engine emission standards and credit provisions as finalized by the U.S. EPA in 2022 are technically achievable for implementation in MY 2027. Furthermore, no additional credit flexibilities are necessary given the number of available credits reported by OEMs to EPA. Specifically, MECA does not support changes to the use of credits for the 5% production allowance, ability for OEMs to use pre-2022 credit banks, changes to the credit discount rates, and any upward movement of the federal emissions limit (FEL) cap.

MECA does not support the use of Nonconformance Penalties (NCPs), except under very limited circumstances and under existing authority granted to EPA. EPA's current heavy-duty proposal does not sufficiently limit the ability for OEMs to use NCPs to pay for compliance in lieu of technology deployment. MECA has requested that the EPA review the "Cost of Compliance at the 90th percentile" (COC90) and "Aftertreatment Aging Factor" (AAF) to ensure the penalties take into consideration public statements by OEMs about the amounts of the penalties and the way that OEMs plan to use them.

EPA's proposal to allow manufacturers the option to use expanded credit allowances and Nonconformance Penalties (NCPs) puts supplier investments and associated jobs at risk. These proposed measures would allow manufacturers to continue to produce and sell engines that emit above MY 2027 standards in volumes that are insufficiently defined. Our position remains that the current regulation as finalized by the U.S. EPA in 2022 included sufficient lead time and compliance flexibility for heavy-duty engine OEMs to meet the MY2027 and later emissions standards.

COMMENT: With regards to Canada's Draft Notice and Guidance for Interim Compliance, it is vital to recognize that the U.S. EPA may issue certificates of conformity for a sizeable volume of heavy-duty engines and vehicles which do not meet MY2027 emissions standards due to the ability of OEMs to use credits or NCPs. For this reason, Canada should consider a compliance methodology that limits the numbers of these "credit engines" or "NCP engines" allowed for sale in MY2027 and later heavy-duty vehicles based on actual credits or NCPs used for these engines.

MECA provides a copy of its comments on the U.S. EPA Proposed Amendments and Nonconformance Penalties for Model Year 2027 and Later Heavy-Duty Highway Engines and Amendments to Inducement Provisions for SCR-Equipped Diesel Engines[2] for your information and consideration.

Conclusion

MECA appreciates the opportunity to comment on the Canadian Vehicle and Engine Emission Regulations and Draft Notice and Guidance for Interim Compliance. As stated above, we have significant concerns that Canada's interim compliance guidance does not provide a mechanism to ensure that non-compliant engines and vehicles are not sold in Canada. Our industry is prepared to do its part and deliver cost-effective and durable advanced emission control and efficiency technologies to the heavy-duty sector to assist in simultaneously achieving lower GHG and NOx emissions, while also meeting other criterial pollutant standards.

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