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**Testimony on  
California Air Resources Board's  
PM Feasibility**

**October 22, 2015**

[Greeting]. I'm Julia Rege, Director of Environment & Energy at the Association of Global Automakers, Inc. (Global Automakers)<sup>1</sup>. Global Automakers represents twelve international automobile manufacturers. In California, in 2014, Global Automakers' member companies accounted for 57% of all new vehicle sales and 72% of new green vehicle sales in California.

Global Automakers and our members are committed to improving air quality and reducing particulate matter (PM). Our automakers are working hard toward these goals and investing in facility upgrades to meet new test requirements and improve measurement accuracy. We are currently collaborating with the Air Resources Board (ARB) and Alliance of Automobile Manufacturers (Alliance) to evaluate and understand PM measurement at low levels – both with regards to the upcoming 3 milligram per mile (mg/mi) and the 2025 1 mg/mi standards.

We are supportive of ARB's work done to date in this area, but in the course of our discussions with ARB, automakers have raised concerns that PM measurement at these very low levels still has many unknowns. First, variability observed during testing shows the 1 mg/mi standard results in little or no compliance margin.

Second, the current data may not be representative of the vehicle fleet produced in 2025.

Finally, automakers cannot yet compare ARB's findings with our own, because automakers are in the process of updating test facilities and procedures, which will likely take several years. Until then, our test results are not comparable with ARB's results. New studies, including round robin testing between the agency and automakers, using Part 1066 compliant labs and representative vehicles are needed before any final decision making.

Thus, we recommend continued collaboration and additional comparative testing (round robin tests) between ARB and the automakers before any decisions on the feasibility of 1 mg/mi PM standards, which will likely be necessary after the midterm review process.

Thank you.

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<sup>1</sup> The Association of Global Automakers, Inc. represents international motor vehicle manufacturers, original equipment suppliers, and other automotive-related trade associations. In the state of California, our members' market share is 57 percent, and our members have invested \$5.7 billion in the state through employment, facilities, dealerships, etc. We work with industry leaders, legislators, regulators, and other stakeholders in the United States to create public policy that improves motor vehicle safety, encourages technological innovation and protects our planet. Our goal is to foster an open and competitive automotive marketplace that encourages investment, job growth, and development of vehicles that can enhance Americans' quality of life. For more information, please visit [www.globalautomakers.org](http://www.globalautomakers.org).