

**COMMENTS OF THE
MANUFACTURERS OF EMISSION CONTROLS ASSOCIATION
ON THE CALIFORNIA AIR RESOURCES BOARD'S PROPOSED
MOBILE SOURCE CERTIFICATION AND COMPLIANCE FEES**

Electronic submittal: <https://www.arb.ca.gov/lispub/comm/bclist.php>

April 19, 2021

The Manufacturers of Emission Controls Association (MECA) would like to provide comments in support of the California Air Resources Board's (CARB) proposed Mobile Source Certification and Compliance Fees. We support CARB's ongoing leadership in the effort to reduce the environmental footprint of transportation to meet the state's SIP and climate goals, including regulations that provide pathways to maintain and improve the cleanliness of the in-use fleet.

MECA is an industry trade association of the world's leading manufacturers of clean mobility technology. Our members have nearly 50 years of experience and a proven track record in developing and commercializing emission control, efficiency and electric technologies for a wide variety of on-road and off-road vehicles and equipment in all world markets. MECA represents suppliers of first fit, as well as retrofit and aftermarket parts.

Our industry has played an important role in the environmental success story associated with highway vehicles and off-road equipment. Moreover, our industry has continually supported CARB's efforts to develop innovative, technology-advancing, regulatory programs to improve air quality and address climate challenges.

MECA and our members have worked with CARB staff for the past two years offering feedback and information to arrive at the proposed Mobile Source Certification and Compliance Fees. MECA would like to extend our thanks to staff who engaged stakeholders in numerous workshops and considered industry feedback to understand the business environment of the aftermarket catalytic converter and retrofit markets. We appreciate CARB's dedication and hard work to propose a schedule of fees that are reasonable and cost effective.

In particular, the setting of reasonable fees for aftermarket catalytic converter parts is appreciated in light of a declining market and at a time when there is also a need for increased vehicle

coverage. We further thank staff for considering the impact of fees on small businesses that are applying for new executive orders.

Retrofit Manufacturers also appreciate the exemption for pre-existing retrofit verifications as the retrofit market is sunsetting rapidly and companies simply do not have the ability to recoup such fees given the low number of future sales. Furthermore, their business models that were developed many years ago did not factor in such fees. We would note to the board however, that the high fees will very likely discourage new verifications.

In closing, our industry would like to highlight to the board our commitment to work with staff as well as other states to explore the development of further aftermarket programs to ensure the availability of replacement emission control components for not only out-of-warranty light duty gasoline vehicles but also for all light-duty and heavy-duty diesel vehicles and non-road engines. The supply of cost-effective replacement emission control parts for all in-use applications is vital to future air quality and environmental equity. This is particularly important for heavy duty highway and non-road engines given their service lives can often extend for several decades and need to be maintained in their certified condition to prevent excessive emissions.

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