

**STATE OF CALIFORNIA
AIR RESOURCES BOARD**

**Public Hearing to Consider Proposed
Amendments Agenda Item 21-13-2
To the Small Off-Road Engine Regulations:
Transition to Zero Emissions**)
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December 9, 2021

**ORAL STATEMENT OF THE
TRUCK AND ENGINE MANUFACTURERS ASSOCIATION**

Good Morning,

I am Patricia Hanz, here on behalf of the Truck and Engine Manufacturers Association (EMA).

EMA and its members have a long history of working cooperatively with CARB and other regulatory agencies worldwide to reduce emissions from their products *utilizing cost effective and technically feasible technology*. We hope to continue those efforts into the future.

My comments today are limited to the impacts of the Proposed Amendments on the manufacturers of Class 1, Class 2 and > 825 cc engines which power non-handheld outdoor power equipment.

EMA understands the need to improve air quality in California, the sense of urgency to move forward with significant reductions, and the role that zero emission technology can play.

EMA members are actively engaged in applying zero emission technology to non-handheld outdoor power products. Indeed, for certain applications, EMA members have electric or battery powered products available today.

However, EMA has multiple concerns with the Proposed Amendments which are describe in detail in our written comments.

My comments today are focussed on an alternate proposal.

Our Alternate Proposal, detailed in our comments, will achieve equivalent, if not greater, emission reductions than the Proposed Amendments, at a fraction of the cost. And, importantly, it avoids the enormous negative effect the Proposed Amendments will have on the thousands of small businesses that utilize outdoor power equipment.

EMA is committed to working with you to achieve meaningful emission reductions which are both technically feasible and cost effective. Our Alternate Proposal does that by providing a cost effective and technologically achievable program for manufacturers and their customers

which can be implemented in a manner that maintains manufacturers ability to provide products which meet customers' needs, including life cycle performance and total cost of ownership, while zero emission technology continues to develop and be introduced to the category.

While we shared our Alternate Proposal with the staff last month, they have not carefully reviewed or assessed its efficacy. We ask that the Board direct Staff to work with us and other stakeholders to develop an implementable alternative program that can and will provide the benefits that CARB is seeking, but at a lower cost and without undue market disruption. We look forward to working with you and your Staff on such a program.

I would be happy to answer any questions.