

Statement of Principles on the Environmental Protection Agency (EPA) Phase 3 Heavy-duty Greenhouse Gas Emissions Standards

February 2024

1. The HDLG Companies support EPA's ongoing efforts to achieve further de-carbonization in the transportation sector through a sound, achievable HD Phase 3 GHG rule that starts in MY 2027. The HDLG companies do not support proposals to delay the start of EPA Phase 3 HD GHG until MY 2030 or later.
2. Each of the HDLG Companies has made public commitments to reduce its carbon footprint by aggressively cutting GHG emissions with near-term milestones and long-term net zero goals. These corporate sustainability principles underpin our support for the finalization of an EPA Phase 3 GHG rule with urgency and not later than March 31, 2024.
3. EPA should make a commitment in the final rule to conduct periodic Technical Assessments of a wide range of factors directly related to the pace of adoption of Zero Emission Tailpipe HD technologies, including: battery technology advancement, availability, and affordability; critical mineral sourcing and cost; deployment of an extensive and available charging/fueling network, supporting electrical grid and fuel infrastructure, and other factors.
4. Long-term technology-neutral regulations provide industry with the confidence to deploy capital and resources that will result in high-quality job growth and technology leadership, which are critical in de-carbonization of the transportation sector. The HDLG companies trust EPA to consider proposing future revisions through new rulemaking, if triggered by any major changes to the factors evaluated in EPA's Technical Assessments, but the HDLG Companies are opposed to proposals for a "hard-wired off ramp" triggered by an infrastructure development or similar metric.
5. Multiple technology pathways exist and must be considered in a technology-neutral manner to achieve EPA's performance-based HD Phase 3 GHG standards. These solutions include hybrid powertrains; advanced engine technologies; hydrogen combustion; and electric and hydrogen zero tailpipe emission propulsion systems. To ensure technology-neutral, performance-based, standards, EPA should make a regulatory commitment within the Phase 3 Final Rule to propose near-term technical amendments to streamline hybrid certification test procedures.
6. Achieving the Administration's ambitious GHG reductions in the HD sector will require a "Whole of Government" approach involving DOE, DOT, EPA, and other Federal, state, and local government Agencies working with the private sector to ensure that IRA and the Bipartisan Infrastructure Law funds are wisely invested across the U.S. economy to leverage a commercially viable HD infrastructure, which accelerates the adoption of zero-emission commercial vehicles.

