

Joint Standing Committee on Environment and Natural Resources

**Testimony of the
Truck and Engine Manufacturers Association
In Support of ME LD 987**

March 17, 2025

Honorable Co-Chairs Senator Tepler and Representative Doudera and Members of the Joint Standing Committee;

My name is Patricia Hanz and I'm here on behalf of the Truck and Engine Manufacturers Association (EMA). EMA represents the world's leading manufacturers of commercial vehicles as well as engines used in on-road and off-road products including trucks; buses; construction and agricultural equipment; locomotives; marine vessels and landscaping equipment. Thank you for the opportunity to testify in support of LD 987.

EMA supported the amendments made to Maine's law in 2024. However, by limiting the exemption in subsection 4, paragraph I to motor vehicles and specific off-road vehicles we believe a substantial segment of the off-road motorized vehicles and mobile and stationary motorized equipment that our members manufacture or provide engines and power trains for were inadvertently excluded from exemption. It is important that these products be included as they use components that are either the same as or like those used in motor vehicles and other products exempted from the law in 2024.

While there are many similarities between the products already exempted under the law there are unique circumstances I would like to describe to demonstrate why it is important to exclude these products. First, the majority of these products are purchased by businesses and government entities for a specific purpose. These vehicles and equipment are highly customized to suit specific commercial needs and functional requirements. Customers select components and features from a wide variety of options. In addition, these vehicles and equipment are not mass produced in a vertically integrated manufacturing process, nor are they "mass produced" in high volumes. These products are designed and intended to be used over extended periods of time – there is no regularly planned obsolescence schedule similar to personal digital devices. And, when they do reach the end of their useful life they are recycled, not landfilled.

Our members manufacture vehicles for both on-road and off-road use. They manufacture equipment that you see on every farm and on every construction site. They manufacture stationary equipment such as generators used for emergency backup power used at public buildings and commercial and industrial sites. In short, if a product is powered by an engine, with the exception of passenger cars, it is manufactured or powered by an EMA member. Our member products are ubiquitous, often just not top of mind. They are how work gets done.

The engines, equipment and vehicles manufactured by our members are also highly regulated by the federal government. While the current statutory exemption recognizes the safety standards under 49 U.S. Code Section 30102(a)(10), an equally important federal law is 42 U.S. Code Chapter 85 (7401 et.seq.), the Clean Air Act. Under the Clean Air Act the products manufactured by our members are subject to strident emission regulations as either “mobile sources” such as on-road and off-road vehicles and equipment, or “stationary” such as standby generators and other industrial processes. As technology has matured, emission control systems for these products employ more, and more complex, technologies, incorporating the use of electronics commonly found in motor vehicles, large marine vessels and aircraft. In addition, EPA also requires approval of the type of fluids used in our products such as refrigerants.

Thank you again for the opportunity to testify and I’m happy to answer any questions you may have.