

Testimony of Mike Hartrick on Behalf of Alliance for Automotive Innovation
Re: Revision of Tier 4 Criteria Pollutant Standards, Part 1
June 3, 2026

Good morning, I am Mike Hartrick. Thank you for the opportunity to speak today on behalf of the Alliance for Automotive Innovation. We represent the automakers producing most vehicles sold in the U.S., alongside equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers.

Since the Tier 4 rule was first proposed in 2023, we have warned that its requirements were on the ragged edge of achievability, if everything went exactly right. Success depended entirely on a flawless scenario of factors beyond the control of automakers: unprecedented consumer adoption of electric vehicles, the rapid creation of a domestic battery critical mineral supply chain, and sustained government incentives to bridge the cost gap.

Unfortunately, reality has not aligned with those assumptions. Consumer adoption of electric vehicles did not rapidly increase. Rather, as documented in Auto Innovators' quarterly *Get Connected* reports, electric vehicle demand flattened and, in fact, declined. At the same time, essential subsidies evaporated, mineral supply chains stalled, and battery component production remains heavily concentrated in China. This fundamental disconnect between outdated policy assumptions and market reality has already stranded billions of dollars in investments. We appreciate that the Agency identified these changes to the compliance landscape in the proposed rule.

Given this landscape, Auto Innovators strongly supports the EPA's decision to delay the near-term Tier 4 requirements. It is a necessary acknowledgment that the Tier 4 rule's underlying assumptions were overly optimistic. Because the 2029 model year begins in under two years, manufacturers are facing immediate, high-stakes product planning decisions.

Additionally, as the EPA notes, this Part 1 modification is only a first step – it does not address the fundamental infeasibility of the Tier 4 standards for model years 2029 and beyond. We urge the EPA to act as quickly as possible on Part 2 of this rulemaking to establish realistic and durable long-term standards.

We support this initial delay, appreciate the EPA's responsiveness to date, and look forward to working cooperatively with the agency and all stakeholders to build a reasonable, workable path forward that protects public health, recognizes consumer needs, and addresses the economic viability of the automotive industry.

Thank you for your time today.