

**U.S. House of Representatives Committee on Energy and Commerce
Subcommittee on Environment**

***Rules of the Road: Examining Legislation to
Modernize the Clean Air Act's Mobile Source Requirements***

**Testimony of Jacqueline Gelb, President and CEO,
Truck and Engine Manufacturers Association**

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Chairman Palmer, Ranking Member Tonko, and Members of the Subcommittee, I appreciate the opportunity to testify before you this afternoon on behalf of the Truck and Engine Manufacturers Association (EMA). I am Jacqueline Gelb, and serve as the President and CEO of EMA, which represents the leading manufacturers of heavy-duty diesel engines and commercial motor vehicles operating in the United States. We appreciate the opportunity to provide input on policy actions affecting our members. We are especially grateful for the Committee's consistent understanding that commercial vehicles differ from other sectors, requiring distinct consideration in both policymaking and implementation.

EMA members design and manufacture the engines and vehicles that move freight, harvest crops, build infrastructure systems, support emergency response, and power essential sectors of the American economy. We have a long history of working constructively with Congress and the Environmental Protection Agency (EPA), state regulators, fleets, equipment owners, and dealers for decades to develop technologies that achieve significant emission reductions while preserving the performance, durability, and affordability that our customers require.

Today, I would like to discuss the critical role that diesel exhaust fluid (DEF) and selective catalytic reduction (SCR) technology play in achieving the near-zero emissions performance of modern diesel engines, recent concerns regarding DEF-related inducement strategies, and opportunities to improve our customer experience while preserving environmental progress that Congress and EPA have long sought to achieve.

Why SCR and DEF Matter

In 2001, EPA finalized a groundbreaking new rule to reduce nitrogen oxide (NO_x) emissions from heavy-duty on-highway diesel engines by more than 90 percent – to near-zero levels.¹ Meeting these new standards required unprecedented investments in engine and

¹ U.S. Environmental Protection Agency. "Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards and Highway Diesel Fuel Sulfur Control Requirements," *Federal Register*; vol. 66. no. 12. January 18, 2001. pp. 5002-5193.

aftertreatment technology. Due to the technological shift for manufacturers, EPA provided nine years to fully implement to allow for market acceptance. Several years later, EPA adopted stringent new standards for construction, agriculture, and other off-road equipment that compelled manufacturers to deploy SCR in a wide range of diesel engines used in those applications.²

The only technology that could feasibly achieve EPA's stringent 2010 emission standards and balance fuel efficiency was and still is SCR. SCR is an innovative technology that requires the use of DEF, a chemical compound consisting of high-purity urea and deionized water to convert smog-forming NO_x into harmless nitrogen and water vapor before they leave the tailpipe. DEF is injected into the exhaust stream, where it enables a catalytic reaction that dramatically reduces emissions.

SCR has proved to be highly effective at reducing NO_x emissions, capable of reducing emissions by 90 to 98 percent at exhaust temperatures above 250 °C.³ That high efficiency has enabled engine manufacturers to optimize combustion to increase performance and reduce fuel consumption, often resulting in higher engine-out NO_x emissions, with the SCR system cleaning up the exhaust. According to the Engine Technology Forum, since the introduction of EPA's 2010 heavy-duty standards and subsequent off-road standards, advanced diesel engines equipped with SCR systems have contributed to a 76 percent reduction in NO_x emissions from highway vehicles and a 42 percent reduction in NO_x emissions from off-road equipment. Combined, those reductions account for nearly 79 percent of the total U.S. reduction in smog forming NO_x emissions during that period.⁴ The reduced fuel consumption enabled by SCR outweighs the increased costs of adding DEF, saving trucking fleets and other users significant operational costs. SCR will play an even greater role next year, when on-highway diesel engine manufacturers are on track to implement EPA's newest standards that reduce NO_x emissions in excess of another 80 percent.

The Importance of DEF Replenishment

Unlike other emission control technologies, which perform without any operator input, SCR requires the operator's involvement to periodically refill the DEF tank. A typical modern heavy-duty diesel engine uses between two and four gallons of DEF for every 100 gallons of fuel consumed by the engine. Without a sufficient quantity of adequate quality DEF onboard the vehicle or equipment, the engine and aftertreatment systems will not function properly or reliably or meet EPA's stringent NO_x standards.

Without DEF, the NO_x emissions coming out of the tailpipe will increase significantly, resulting in emission levels not seen for decades. EPA determined that the operator must be induced to replenish the onboard DEF supply. For this reason, EPA's regulations require manufacturers to provide operator warnings before the DEF tank is empty. If the operator ignores

² U.S. Environmental Protection Agency, "Control of Emissions of Air Pollution from Nonroad Diesel Engines and Fuel," *Federal Register*, vo. 69, no. 124, June 29, 2004, pp. 38958-39273.

³ U.S. Environmental Protection Agency, "Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards," *Regulatory Impact Analysis*, EPA-420-R-22-035, December 22, 2022, pp.6.

⁴ Engine Technology Forum, "A Clean Air and Energy Savings Story," www.enginetechnforum.org.

the warnings and does not replenish the DEF supply, EPA requires the manufacturer to derate the engine (*i.e.*, reduce its power output).

Providing Operational Relief

EPA's policy objectives are understandable: ensuring that emission control systems continue to operate as intended. However, real-world experience has shown that some inducement requirements can create operational burdens, restricting our customers' ability to deliver their load or finish their task. In response, over the past year, we have assisted EPA with devising modifications to the inducement requirements that will significantly reduce the negative impacts of derates on operational efficiency. EPA has released three separate guidance documents -- one in August 2025, and two more in January and March of this year -- to provide manufacturers with the flexibility they need to minimize inducement burdens and risks. EMA has publicly supported each release of EPA's commonsense guidance, and engine manufacturers are right now rolling out new engine programming that is consistent with the guidance.

EMA and its members welcome Representative Fedorchak and the subcommittee for their efforts to codify EPA's recent guidance with the *Diesel Emission Fluid Flexibility Act*. We stand ready to work constructively with Congress and EPA, as we have in the past, on any new requirements to further improve the user experience with SCR and DEF.

We are also pleased that the Committee is considering H.R. 2140, the *Diesel Emissions Reduction Act of 2025*, sponsored by Representatives Matsui and Langworthy. This legislation would reauthorize the DERA program -- a program of significant importance to our members. For every dollar invested, DERA returns more than ten dollars in public benefits by supporting projects that reduce NO_x emissions from diesel vehicles, improve air quality, and protect human health.

The DERA program delivers measurable value nationwide. Its benefits reach every state, tribal nation, U.S. territory, and the District of Columbia. Thirty percent of DERA funding is allocated directly to state governments, with the remainder awarded through a highly competitive federal grant process for individual projects. Recognized as one of the most cost-effective federal clean air programs, DERA has a long track record of bipartisan support and proven results. We strongly support timely reauthorization and hope to see H.R. 2140 enacted before the program expires.

In Conclusion

Through collaboration among manufacturers, regulators, fleets, and equipment users, the United States has achieved dramatic reductions in diesel emissions while improving fuel efficiency and maintaining the performance demanded by our industries. As Congress evaluates potential changes to DEF-related requirements, we encourage a balanced approach that ensures DEF is onboard the vehicle or equipment and preserves the fuel savings and performance needs of our customers while addressing legitimate operational impacts and user experiences.

EMA stands ready to work with Congress and all stakeholders to ensure that America's

diesel fleets remain both the most productive and cleanest in the world.

Thank you for the opportunity to testify. I look forward to answering any questions.