



Zero-Emission Forklift Regulation Overview for State and Local Government Fleets

January 2026

While this document is intended to assist regulated parties with their compliance efforts, it does not alter or modify the terms of any CARB regulation, is not a substitute for reading the regulation, nor does it constitute legal advice. It is the sole responsibility of regulated parties to ensure compliance with the Zero-Emission Forklift regulation.

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Implementation Advisory

California Air Resources Board (CARB) has not yet sought authorization from the U.S. Environmental Protection Agency (U.S. EPA) for the Zero-Emission Forklift (ZEF) regulation pursuant to section 209(e)(2)(A) of the Clean Air Act. Until U.S. EPA grants such authorization or determines authorization is not necessary, CARB staff will not enforce the ZEF regulation against any privately-owned or operated fleets. Because CARB is committed to reducing air pollution to protect public health, we encourage affected industries to continue reducing their emissions and we look forward to continued partnership in these efforts.

California state and local government fleets must comply with the ZEF regulation.

For more information, view the full implementation advisory on the ZEF website (https://ww2.arb.ca.gov/sites/default/files/2025-05/ZEF%20Advisory_1.pdf).

Purpose and History

The purpose of the ZEF regulation is to reduce criteria pollutants and greenhouse gases by requiring the phase out of large spark-ignition (LSI) forklifts. ZEFs, such as those that run on battery-electric and fuel-cell powertrains, have been successfully used for decades and proven to be effective alternatives to internal combustion forklifts.

Following an extensive public process, the ZEF regulation was approved by CARB in June 2024 to help California meet its air quality and climate goals through zero-emission technology.

Applicability

This regulation applies to cushion-tired (Class IV) forklifts of all lift capacities and pneumatic-tired (Class V) forklifts of lift capacities 12,000 pounds or less powered by a large spark-ignited engine, such as propane-, natural gas-, and gasoline-fueled forklifts. Any state and local government entity that owns, operates, leases, or rents one or more LSI forklifts in California are subject to this regulation. This regulation does not apply to rough-terrain forklifts, vehicle-mounted forklifts, telescoping boom forklifts, pallet jacks, or forklifts used solely for personal purposes, combat/tactical support, or at ports and railyards.

Until U.S. EPA grants such authorization or determines authorization is not necessary, CARB staff will not enforce the ZEF regulation against private companies, including dealers, manufacturers, or rental agencies. California state and local government fleets must comply with the ZEF regulation.

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Requirements

Fleet Operators

Starting January 1, 2026, fleet operators cannot acquire and operate an LSI forklift, unless it is:

- A used 2025 or previous model year (MY) that is not yet phased out,
- A Class V 2026 through 2028 MY forklift rented from a rental agency before January 1, 2038,
- A Class V forklift with a lift capacity greater than 12,000 pounds reported according to Heavy Class V LSI Forklift Reporting, or,
- Acquired according to an exemption or extension.

The regulation includes exemptions for fleet operators that would operate forklifts as low-use or dedicated emergency.

Fleet Phase-Out Provisions

From 2028 to 2038, fleet operators will be required to phase out existing LSI forklifts by MY and class, addressing the oldest equipment first. Large fleets (26 or more forklifts) will be subject to a more aggressive phase-out timeline than small fleets. Small fleets (25 or fewer forklifts) may use the alternative phase-out schedule.

To reduce the burden for fleets with older forklifts, the required turnover of forklifts for the first compliance date is capped at no more than 50% of forklifts for large fleets and 25% for small fleets.

Phase-out schedules are as follows:

MY Phase-Out Schedules for Class IV LSI Forklifts

Compliance Date	Class IV Forklifts ($\leq 12,000$ Pounds)	Class IV Forklifts ($< 12,000$ Pounds)
1/1/2028	2018 MY and older	-
1/1/2031	2019-2021 MY	-
1/1/2033	2022 and 2023 MY	-
1/1/2035	2024 and 2025 MY	2025 MY and older

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Alternative MY Phase-Out Schedules for Small Fleets

Compliance Date	Class IV Forklifts (≤12,000 Pounds)	Class IV Forklifts (<12,000 Pounds)
1/1/2029	2016 MY and older	-
1/1/2032	2017-2019 MY	-
1/1/2034	2020 and 2021 MY	-
1/1/2036	2022 and 2023 MY	-
1/1/2038	2024 and 2025 MY	2025 MY and older

MY Phase-Out Schedules for Class V LSI Forklifts

Compliance Date	Class V Forklifts
1/1/2030	2017 MY and older
1/1/2033	2018-2020 MY
1/1/2035	2021 and 2022 MY
1/1/2038	2023-2028 MY

The phase-out schedule for Class V LSI forklifts does not apply to those with a rated capacity greater than 12,000 pounds that have been reported according to Heavy Class V LSI Forklift Reporting.

Fleets that report separately as fleet portions will be required to meet the phase-out requirements for the fleet size that corresponds to the total number of LSI forklifts and ZEFs under common ownership or control.

Additionally, no later than March 31, 2026, fleet operators must contact their electric utility provider to discuss potential electrical service installation or upgrades for each separately metered building or operating location with LSI Forklifts subject to the phase-out requirements. For each California location, the discussion must include at time of contact:

- The address where forklifts are operated,
- The estimated number and types of chargers to be installed each year to charge the necessary ZEFs,
- The power requirements of any new infrastructure needed to fuel the necessary ZEFs, if applicable,
- Information on other new sources of power demand anticipated during the applicable phase-out period(s), and
- Electrical load profiles depicting the location's typical electricity usage on an hourly, daily, and monthly basis.

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If another entity is responsible for the electrical infrastructure at the operating location, the fleet operator may have that entity contact the provider on its behalf.

Labeling

LSI forklifts acquired pursuant to an exemption or extension must be affixed with at least one Equipment Identification Number (EIN) label within 30 calendar days of receiving an EIN. Labels must be permanently affixed in clear view on the outside of the LSI forklift. The label must remain legible and visible for the entire life of the LSI forklift. The EIN is in white on a red background, with each character at least three inches (7.6 centimeters) in height and 1.5 inches (3.8 centimeters) in width.

As a courtesy, CARB has assembled a list of label vendors who have demonstrated that they can meet the label specifications, which is available at <https://ww2.arb.ca.gov/resources/documents/label-vendors-road-diesel-vehicles-and-large-spark-ignited-lsi-equipment>.

Reporting and Recordkeeping

Fleet operators have reporting requirements beginning ---- Beginning in 2026, fleets must maintain records related to reporting requirements needed to demonstrate compliance with the regulation. Requirements include general recordkeeping, annual reporting, and MY phase-out reporting.

Additionally, each exemption, including those for low-use, dedicated emergency, and heavy Class V LSI forklifts, has recordkeeping requirements. Fleets intending to gain credit for the deployment of heavy ZEFs have further requirements.

Documentation and reports will be submitted electronically using the DOORS reporting system. All documentation must be written in English be signed under penalty of perjury by the Responsible Official or Designated Official.

Extensions and Exemptions

The regulation provides exemptions in certain situations, such as for low-use, dedicated emergency use, and in-field forklifts. The regulation also allows for the temporary storage of non-compliant forklifts awaiting sale, scrap, or relocation, as well as the transportation of LSI forklifts for delivery out-of-state.

The regulation provides extensions for delays outside of the fleet operator's control, such as delays in the delivery of ZEFs, delays in the installation of charging/fueling infrastructure, or if there is no commercially available ZEF model that can meet the needs of an operation currently served by an LSI forklift. In order to obtain an extension, an application must be submitted and reviewed by CARB's Executive Officer. For more information on how to apply for an extension please visit this page: <https://ww2.arb.ca.gov/our-work/programs/zero-emission-forklifts/extension-requests>.

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Forklifts subject to exemptions or extensions are also subject to labeling requirements.

Low-Use Large Spark-Ignition Forklift Exemption

Low-use forklifts are limited to fewer than 200 hours per calendar year. Each low-use forklift must be equipped with an operational, non-resettable hour meter and labeled with its EIN. Fleet operators will gather one hour meter reading within 30 calendar days of January 1 of the first year the forklift is designated low-use, and one hour meter reading within 30 calendar days of December 31 for each year thereafter. Fleet operators must maintain date-stamped photographs of the hour meter each time the reading is gathered, except when safety protocols or access to a camera prohibit it. These records are to be kept for a minimum of five years from the date of the reading. Microbusinesses may apply a three-year rolling average of less than 200 hours for low-use forklifts, provided the forklift is operated only in California for three consecutive years.

When operated in accordance with these provisions, low-use LSI forklifts are exempt from fleet operator requirements until December 31, 2030. Microbusinesses may continue to operate a single low-use LSI forklift beyond this date.

Dedicated Emergency Large Spark-Ignition Forklift Exemption

Dedicated emergency forklifts are maintained and operated by or under the authority of a government agency for the purpose of supporting emergency operations as defined in the regulation. Dedicated emergency forklifts must be operated fewer than 200 hours per calendar year for purposes other than supporting emergency operations, but they are not limited in hours accrued during such operations.

For example, Fire Department A has a forklift that is used for firefighting, but they also use it 100 hours per year for moving items around the storage yard. Fire Department A's forklift can be a dedicated emergency forklift. Fire Department B has a forklift that is used for firefighting, but they also use it 201 hours per year for moving items around the storage yard. Fire Department B's forklift cannot be considered a dedicated emergency forklift.

Any dedicated emergency forklift may apply a three-year rolling average of less than 200 hours for purposes other than supporting emergency operations per calendar year. Emergency forklifts must be labeled with an EIN and are subject to the same hour monitoring requirements as low-use forklifts, with additional readings at the commencement and completion of each emergency operation. Additionally, a copy of the emergency declaration and official directives to deploy emergency forklifts must be maintained for at least five years from the date of the declared emergency event.

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Temporary Storage of Non-Compliant Forklifts

A fleet operator may temporarily store a non-compliant LSI forklift onsite for up to six consecutive months while the forklift is awaiting sale, scrap, or relocation. The fleet operator must disconnect or remove the battery (and propane tank, if applicable) and affix an appropriate lockout or tagout device, such that the forklift cannot be energized or operated. Non-compliant forklifts must not be operated while awaiting sale, scrap, or relocation, except during their transportation off-site.

Zero-Emission Forklift Delivery Delay Extension

Fleet operators may request an extension if the ZEFs they have ordered to replace LSI forklifts cannot be delivered by the upcoming compliance date due to circumstances beyond the fleet operator's control. In order to request a delivery delay extension, the fleet operator must label the affected LSI forklifts, submit all required documentation, meet all eligibility criteria, and submit the initial request before January 1, 2038. Extension renewals must be submitted before the expiration of the initial extension.

Infrastructure Delay Extensions

A fleet operator may request infrastructure delay extensions if there are delays due to circumstances beyond the fleet operator's control on a project to install ZEF-related charging and fueling infrastructure. Infrastructure delay extensions include construction delays and site electrification delays.

Operational Extension

A fleet operator may request an operational extension if there is no commercially available ZEF model that can meet the needs of an operation currently served by an LSI forklift to be phased out by the upcoming compliance date. This extension may be utilized for operation of an LSI forklift after the applicable compliance date or for the replacement of an LSI forklift with another LSI forklift. A fleet operator must meet all fleet eligibility criteria and submit all required documentation to request this extension.

Incentives

Incentive programs, such as the Carl Moyer Memorial Air Quality Standards Attainment Program (<https://ww2.arb.ca.gov/carl-moyer-program-apply>), FARMER (<https://ww2.arb.ca.gov/our-work/programs/farmer-program>), and Clean Off-Road Equipment Voucher Incentive Project (www.californiacore.org), may have funding options available for ZEFs. Please see the program pages for details.

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This overview is intended for informational purposes and does not supersede the regulation. For additional details, please see the ZEF regulation (<https://ww2.arb.ca.gov/our-work/programs/zero-emission-forklifts>) web page or scan the QR code.



If you have questions, please send them to zeforklifts@arb.ca.gov.

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