



Zero-Emission Forklift Regulation: Reporting Guidelines

The California Air Resources Board (CARB) approved the Zero-Emission Forklift (ZEF) regulation for adoption in June 2024, and it was approved by the Office of Administrative Law on September 16, 2024. The regulation became effective on January 1, 2026, and it is currently being implemented for state and local government fleets. The regulation is not enforceable for privately owned and federal fleets in California.

This guide summarizes the reporting guidelines for state and local government fleets under the [ZEF Regulation, title 13, California Code of Regulations, section 3009, "Reporting and Recordkeeping"](#). This guide is intended to assist fleets in understanding their reporting obligations; it does not expand, alter, or replace any regulatory requirements. In the event of any inconsistency, the regulation text shall take precedence.

Do You Need to Report?

State and local governments fleets with **a Class IV or Class V large-spark ignition (LSI) forklift** are subject to the ZEF Regulation and are required to report.

State and local government fleets containing **only ZEF forklifts do not** need to report, this regulation is specific to Class IV and Class V LSI forklifts.

Initial Reporting

A Responsible Official must submit an initial report to CARB **by April 30, 2026, for large fleets** and **by September 30, 2026, for small fleets**. Under [section 3009 \(c\)\(1\) and \(d\)\(1\)](#) the initial report must include the following information:

- Entity information
 1. Entity name
 2. Parent company, corporation, or agency, if reporting fleet portion
 3. Entity address(es)
 4. Contact name(s)
 5. Contact phone number(s)
 6. Contact e-mail address(es)
 7. Responsible official name

8. Responsible official title

- Total Number of Class IV LSI Forklifts within the Fleet on January 1, 2026, excluding exempt forklifts. Exempt forklifts include those in low-use, in-field, dedicated emergency, or those under an extension.
- Total Number of Class V LSI Forklifts with a Rated Capacity of 12,000 pounds or less within the Fleet on January 1, 2026, excluding exempt forklifts
- Each separately metered building or operating location with LSI Forklifts including:
 1. Copy of the information submitted to the applicable electric utility provider ([Section 3009 \(c\)\(1\)\(D\)\(1\), Title 13, California Code of Regulations](#))
 2. Copy of the confirmation provided by the electric utility provider or other evidence that the information was submitted to the utility
 3. The date by which the existing panel capacity is expected to be insufficient to charge or fuel ZEFs necessary

Please use this link for additional assistance on how to conduct initial reporting in DOORS: <https://ww2.arb.ca.gov/sites/default/files/2026-03/2026%20ZEF%20Initia%20Rep%20User.pdf>.

For assistance with contacting utilities please use CARB's Utility Contact Guideline, using this link: https://ww2.arb.ca.gov/sites/default/files/2026-03/zef%20fact%20sheet%20new_0.pdf

For Small Fleets Only

If opting to phase out Class IV LSI Forklifts according to the Alternative model year (MY) Phase-Out Schedules for Class IV LSI Forklifts, per [section 3009 \(d\)\(1\)\(D\)](#) please include the following for each forklift:

- Forklift manufacturer
- Forklift model
- Forklift serial number
- Forklift class
- Rated capacity
- Powertrain type (LSI, battery electric, or fuel-cell electric)
- Primary operating location address
- **for LSI forklifts specifically:**



- Engine MY
- Engine manufacturer
- Engine model
- Engine serial number

Annual Reporting

Annual reporting begins the first year after the initial report is due. A large fleet's Responsible Official must report to CARB annually **by April 30 of each calendar year. The first annual report is due no later than April 30, 2027.** A small fleet's Responsible Official must report to CARB annually **by September 30 of each calendar year. The first annual report is due no later than September 30, 2027.**

The annual report must include the following information:

- Updates to any Entity or Forklift number information provided in previously submitted reports
- Each separately metered building or operating location with LSI Forklifts including:
 1. If the existing panel capacity is currently sufficient to charge or fuel ZEFs necessary to comply with the phase-out requirements
 2. The date by which the existing panel capacity is expected to be insufficient to charge or fuel ZEFs necessary to comply with the phase out requirements

Final Report for Class IV LSI Forklifts

When a fleet has completed phasing out all their LSI forklifts a final report is due.

- **For Large Fleets:** A confirmation must be submitted by a Responsible Official that the fleet has completed its phase-out of Class IV LSI Forklifts no later than April 30, 2035, or April 30 of the final year of an applicable extension, whichever is later.
- **For Small Fleets:** A confirmation must be submitted by a Responsible Official that the fleet has completed its phase-out of Class IV LSI Forklifts no later than September 30, 2035, or September 30th of the final year of an applicable extension, whichever is later.



Final Report for Class V LSI Forklifts.

- **For Large Fleets:** A confirmation must be submitted by a Responsible Official that the fleet has completed its phase-out of Class V LSI Forklifts no later than April 30, 2038, or April 30 of the final year of an applicable extension, whichever is later.
- **For Small Fleets:** A confirmation must be submitted by a Responsible Official that the fleet has completed its phase-out of Class V LSI Forklifts no later than September 30, 2038, or September 30 of the final year of an applicable extension, whichever is later.

For Small Fleets Only

If utilizing the Alternative MY Phase-Out Schedules for Class IV LSI Forklifts, please provide the following information as part of annual reporting:

- Each LSI Forklift and ZEF added the previous calendar year, **including the date each forklift entered the fleet and primary operating address**, as well as the following information:
 1. Forklift manufacturer
 2. Forklift model
 3. Forklift serial number
 4. Forklift class
 5. Rated capacity
 6. Powertrain type (LSI, battery electric, or fuel-cell electric)
 7. Primary operating location address

for LSI forklifts specifically:

 8. Engine MY
 9. Engine manufacturer
 10. Engine model
 11. Engine serial number
- Each LSI Forklift and ZEF removed from the fleet the previous calendar year, **including the equipment identification number and date the forklift was removed from the fleet**