



Fact Sheet: Zero-Emission Forklift Requirements

Applicability [[Section 3000](#)]

The Zero Emission Forklift (ZEF) Regulation has not received authorization from the U.S. Environmental Protection Agency pursuant to section 209(e)(2)(A) of the Clean Air Act. Currently the regulation is not being enforced for privately owned or federal fleets in California. It is only being enforced for State and Local Government fleets.

State and local government fleets with cushion-tired (Class IV) or pneumatic-tired (Class V) Large Spark Ignition (LSI) forklifts are subject to the ZEF regulation.

The goal of the ZEF regulation is to reduce criteria pollutants and greenhouse gases by phasing out LSI forklifts and prohibiting their purchase. ZEFs have extensive history and are a proven safe and effective alternative to internal combustion forklifts.

Requirements [[Section 3002](#)]

Starting January 1, 2026, state and local government fleet operators cannot acquire or operate an LSI forklift, subject to the following exceptions:

- A used 2025 or older model year (MY) that has not yet phased out (see Tables 1-3 below);
- Prior to January 1, 2027, a new 2025 MY LSI Forklift;
- Prior to January 1, 2038, a Class V 2026 through 2028 MY forklift rented from a rental agency;
- 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.

Fleet Phase-Out Provisions [[Section 3006 \(d\)](#)]

Beginning January 1, 2028, state and local government fleet operators will be required to phase out existing LSI forklifts by MY and class.

Oldest equipment should be phased out first. There are different requirements and timelines for small fleets and large fleets. Fleet size is determined by the total number

of Class IV and Class V LSI and ZEF forklifts in each fleet. Large fleets are comprised of 26 or more forklifts. Large fleet phase-out timeline is found in Table 1. Small fleets (25 forklifts or fewer) may use the alternate phase-out schedule (Table 2).

Table 1. MY Phase-Out Schedules for Class IV LSI Forklifts

<i>Compliance Date</i>	<i>Prohibited Class IV Forklifts with a Rated Capacity of 12,000 Pounds or Less</i>	<i>Prohibited Class IV Forklifts with a Rated Capacity Greater than 12,000 Pounds</i>
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

Table 2. Alternative MY Phase-Out Schedules for Small Fleets and Crop Preparation Services

<i>Compliance Date</i>	<i>Prohibited Class IV Forklifts with a Rated Capacity of 12,000 Pounds or Less</i>	<i>Prohibited Class IV Forklifts with a Rated Capacity Greater than 12,000 Pounds</i>
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

Table 3. MY Phase-Out Schedule for Class V LSI Forklifts with a Rated Capacity of 12,000 pounds or less

<i>Compliance Date</i>	<i>Prohibited Class V Forklifts</i>
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

Class V LSI Forklifts with a Rated Capacity greater than 12,000 pounds are not required to be phased out.

Phase-Out Percentage Caps [[Section 3006 \(e\)\(1-7\)](#)]

To reduce the burden for state and local government fleets with older forklifts, Fleet Operators may utilize applicable phase-out percentage caps.

1. Forklifts shall be phased out in the order of oldest to newest, based on MY.
2. The Fleet Operator is not required to phase out any additional applicable LSI Forklifts by said compliance date once the cap has been reached.
3. To calculate the number of LSI Forklifts, the Fleet Operator must phase out on a particular compliance date, the Fleet Operator shall multiply the applicable cap percentage, represented as a decimal (0.5 or 0.25, as applicable), by the total number of Class IV or Class V LSI Forklifts, as applicable, within the fleet as of January 1, 2026. If the calculated percentage of phased-out LSI Forklifts is a fraction, the fraction shall be rounded up to the nearest whole number.
4. All applicable LSI Forklifts exempted from being phased out by a phase-out percentage cap shall be phased out by the next applicable compliance date.
5. Prior to the applicable compliance date, the fleet shall report to CARB the information specified in Section 3009(k), informing CARB of their intent to use the alternative phase-out percentage cap option.

Large State and Local Government fleets: A phase-out percentage cap of 50% may be applied to the January 1, 2028, compliance date for Class IV Forklifts and to the January 1, 2030, compliance date for Class V Forklifts.

Example Calculation:

- There is a large fleet comprised of 50 forklifts:

Model Year	Number of Forklifts
2017	15
2018	20
2020	10
2021	5

- Due to the large percentage of 2018 MY and older forklifts, this fleet may utilize a percentage cap to remain in compliance with the upcoming compliance date of January 1, 2028. Since they are a large fleet, 50% of their forklifts that are out of compliance must be phased out by January 1, 2028.

- The phase-out percentage cap for large fleets is 50%. Fifty percent of 50 is 25. This means that 25 forklifts must be phased out by January 1, 2028. In this fleet's case, since they have 35 forklifts that are MY 2018 or older, they have the option of keeping ten 2018 MY forklifts until the next phase-out deadline, which is January 1, 2031. Older forklifts must be removed first, so the fleet must phase out 15 of the 2017 MY forklifts and 10 of the 2018 MY forklifts by January 1, 2028.
- If this fleet was using the traditional phase-out requirements, all the 35 forklifts out of compliance would need to be removed by January 1, 2028. With the phase-out percentage caps, only 25 of the forklifts will need to be phased out by January 1, 2028.

Small State and Local Government Fleets: A phase-out percentage cap of 25% may be applied to the first compliance date provided in Table 1 or Table 2, as applicable, for Class IV Forklifts and the January 1, 2030, compliance date for Class V Forklifts.

Example Calculation:

- There is a small fleet comprised of 20 forklifts:

Model Year	Number of Forklifts
2015	2
2016	10
2019	4
2020	4

- Since this is a small fleet, it can use the phase-out percentage caps in Table 1 or Table 2. This example will utilize Table 2.
- Small fleets may use a cap of 25%. Twenty-five percent of 20 is five. This means that the five oldest MY forklifts must be phased out by January 1, 2029. In this case, the fleet must phase out the two 2015 MY forklifts and three of the 2016 MY forklifts. They can keep operating the other seven 2016 MY forklifts until the next phase-out deadline, which is January 1, 2032. After that date, the remaining 2016 MY forklifts must be removed from the fleet along with the four 2019 MY forklifts.
- If this fleet was using the traditional phase-out requirements, all 12 of the 2015 MY and 2016 MY forklifts would need to be removed by January 1, 2029. With the phase-out percentage caps, only five of these forklifts will need to be phased out by January 1, 2029.

Contact

This overview is intended for informational purposes and does not supersede the ZEF regulation. For additional details, please see the ZEF regulation ([Zero-Emission Forklift: State and Local Government Fleets | California Air Resources Board](#)) web page.

If you have questions, please send them to zeforklifts@arb.ca.gov or contact (877) 593-6677 / (877) 59DOORS.