



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 combined

total number of Class IV and Class V LSI and ZEF forklifts in each fleet. The phase-out timelines for Large Fleets (26 or more forklifts) are found in Table 1 for Class IV forklifts and Table 3 for Class V. Small Fleets (25 forklifts or fewer) may use either the same timeline as Large Fleets for Class IV forklifts in Table 1 or the alternate phase-out schedule in Table 2. They will use the same phase-out schedule in Table 3 for Class V LSI Forklifts. Forklifts shall be phased out before the compliance date.

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 Class IV LSI Forklifts 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 an optional phase-out percentage cap. This limits the number of forklifts to be phased out by the first applicable compliance date to up to 50% for Large Fleets and 25% for Small Fleets.

1. To confirm if a phase-out cap is applicable, a fleet should determine the number of Class IV and V LSI Forklifts that will be phased out by the first compliance date and divide that by the total number of Class IV and V LSI Forklifts in the fleet, respectively. If either number is above 50% for Large Fleets or 25% for Small Fleets, the phase-out percentage cap may be applied to the applicable phase-out date.
2. 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.
3. Forklifts shall be phased out in the order of oldest to newest, based on MY.
4. To calculate the number of LSI Forklifts to be phased out under the cap, the Fleet Operator must phase out by a particular compliance date, the Fleet Operator shall perform either one or two calculations, depending on the Class of the forklifts: They must multiply the applicable cap percentage, represented as a decimal (0.5 or 0.25, as applicable), by the total number of Class IV LSI forklifts or the total number of Class V LSI Forklifts, as applicable, within the fleet as of January 1, 2026. These numbers are the amount of Class IV and Class V LSI Forklifts that will need to be phased out by their applicable first compliance date. If the calculated percentage of phased-out LSI Forklifts is a fraction, the fraction shall be rounded up to the nearest whole number.
5. The Fleet Operator is not required to phase out any additional LSI Forklifts by the first applicable compliance date once the cap has been reached. Remaining LSI Forklifts for those compliance dates shall be phased out by the next applicable compliance date.

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 that has 100 Class IV and V LSI forklifts as of January 1, 2026:

70 Class IV ($\leq 12,000$ Pounds)	30 Class V ($\leq 12,000$ Pounds)
70 forklifts $\times 0.5 = 35$ forklifts	30 forklifts $\times 0.5 = 15$ forklifts
Only 35 MY2018 and older Class IV to be phased out by 1/1/2028	Only 15 MY2017 and older Class V to be phased out by 1/1/2030
Remaining MY2018 and older Class IV must be phased out by 1/1/2031	Remaining MY2017 and older Class V must be phased out by 1/1/2033

- Within this Large Fleet, it was determined that more than 50% of both the Class IV and V LSI Forklifts are older and would need to be phased out by the January 1, 2028, and 2030 compliance dates. This fleet can utilize a 50% phase-out cap for both to reduce the burden on their fleet.
- Two calculations must be performed:
 - Class IV:
 - There are 70 Class IV LSI Forklifts in this fleet as of January 1, 2026. The first phase-out date for MY2018 and older Class IV LSI Forklifts is January 1, 2028.
 - Multiply 70 by 0.5 to get 50%. This amounts to 35 MY2018 and older Class IV LSI Forklifts that need to be phased out by the January 1, 2028, compliance date.
 - The remaining MY2018 and older Class IV LSI Forklifts, however many that may be, shall be phased out by the next compliance date of January 1, 2031, along with any MY2019 to 2021 Class IV forklifts scheduled for phase-out.
 - Class V:
 - There are 30 Class V LSI Forklifts in this fleet as of January 1, 2026. The first phase-out date for MY2017 and older Class V LSI Forklifts is January 1, 2030.
 - Multiply 30 by 0.5 to get 50%. This amounts to 15 MY2017 and older Class V LSI Forklifts that need to be phased out by the January 1, 2030, compliance date.
 - The remaining MY2017 and older Class V LSI Forklifts, however many that may be, shall be phased out by the next

compliance date of January 1, 2033, along with any MY2018 to 2020 Class V forklifts scheduled for phase-out.

Small State and Local Government Fleets: A phase-out percentage cap of 25% may be applied to either the January 1, 2028, or January 1, 2029, compliance dates, whichever timeline the fleet has chosen for Class IV Forklifts, and to the January 1, 2030, compliance date for Class V Forklifts.

Example Calculation:

- There is a Small Fleet that has 16 Class IV and V LSI forklifts as of January 1, 2026:

7 Class IV ($\leq 12,000$ Pounds)	9 Class V ($\leq 12,000$ Pounds)
$7 \text{ forklifts} \times 0.25 = 1.75 \rightarrow 2 \text{ forklifts}$	$9 \text{ forklifts} \times 0.25 = 2.25 \rightarrow 3 \text{ forklifts}$
Only 2 MY2018 and older Class IV to be phased out by 1/1/2028 or 1/1/2029	Only 3 MY2017 and older Class V to be phased out by 1/1/2030
Remaining MY2018 and older Class IV must be phased out by 1/1/2031 or 1/1/2032	Remaining MY2017 and older Class V must be phased out by 1/1/2033

- Within this Small Fleet, it was determined that more than 25% of both the Class IV and V LSI Forklifts are older and would need to be phased out by the January 1, 2028, or 2029 and 2030 compliance dates. This fleet can utilize a 25% phase-out cap for both to reduce the burden on their fleet.
- Two calculations must be performed:
 - Class IV:
 - There are 7 Class IV LSI Forklifts in this fleet as of January 1, 2026. The first phase-out date for MY2018 and older Class IV LSI Forklifts is January 1, 2028, or January 1, 2029, for Small Fleets utilizing the alternative phase-out schedule.
 - Multiply 7 by 0.25 to get 25% which is 1.75 forklifts. This number must be rounded up to 2 MY2018 and older Class IV LSI Forklifts that need to be phased out by the January 1, 2028, compliance date
 - The remaining MY2018 and older Class IV LSI Forklifts, however many that may be, shall be phased out by the next

compliance date of January 1, 2031, or 2032, along with any MY2019 to 2021 Class IV forklifts scheduled for phase-out.

- Class V:

- There are 9 Class V LSI Forklifts in this fleet as of January 1, 2026. The first phase-out date for MY2017 and older Class V LSI Forklifts is January 1, 2030.
- Multiply 9 by 0.25 to get 25% which is 2.25 forklifts. This number must be rounded up to 3 MY2017 and older Class V LSI Forklifts that need to be phased out by the January 1, 2030, compliance date.
- The remaining MY2017 and older Class V LSI Forklifts, however many that may be, shall be phased out by the next compliance date of January 1, 2033, along with any MY2018 to 2020 Class V forklifts scheduled for phase-out.

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.