

From: [TBT国家咨询点](#)
To: [usatbtcp](#)
Subject: China Requests Extension of Comment Period to 28 August 2025 on WTO Notification G/TBT/N/USA/2218 - Advanced Clean Trucks Pooling Amendments
Date: Thursday, July 10, 2025 5:45:39 AM

Dear USA WTO/TBT Enquiry Point:

On June 25, 2025, China received the "Advanced Clean Trucks Pooling Amendments (G/TBT/N/USA/2218) ", which was notified to the WTO by USA. In the notification, the final date for comments is 14 July 2025. We believe that the comment period is too short, does not comply with the TBT Agreement rules, and is contrary to international practices (60 days of comment period). In order to allow sufficient time for other WTO members, including China, to comment the above notification, we propose that the deadline for comments be revised to be within 60 days of the notification, which is 28 Aug, 2025.

Please acknowledge receipt of this email by return message and reply us as soon as possible.

Thank you.

Yours faithfully

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NOTIFICATION

The following notification is being circulated in accordance with Article 10.6

1.	Notifying Member: <u>UNITED STATES OF AMERICA</u> If applicable, name of local government involved (Article 3.2 and 7.2): State of California
2.	Agency responsible: California Air Resources Board (CARB)
3.	Notified under Article 2.9.2 [], 2.10.1 [], 5.6.2 [], 5.7.1 [], 3.2 [X], 7.2 [], Other:
4.	Products covered (HS codes or national tariff lines. ICS numbers may be provided in addition, where applicable): Truck emissions; Environmental protection (ICS code(s): 13.020); Transport exhaust emissions (ICS code(s): 13.040.50); Road vehicle systems (ICS code(s): 43.040)
5.	Details of notified document(s) (title, number of pages, means of access): Advanced Clean Trucks Pooling Amendments; (20 page(s), in English), (3 page(s), in English), (9 page(s), in English) Link to notified document(s) and/or contact details for agency or authority which can provide copies upon request: https://ww2.arb.ca.gov/rulemaking/2025/actpooling USA WTO TBT Enquiry Point, Email: usatbtep@nist.gov https://members.wto.org/crnattachments/2025/TBT/USA/25_04169_00_e.pdf https://members.wto.org/crnattachments/2025/TBT/USA/25_04169_01_e.pdf https://members.wto.org/crnattachments/2025/TBT/USA/25_04169_02_e.pdf
6.	Description of content: California Air Resources Board (CARB) Proposed Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure - The proposed amendments to the ACT regulation include the following modifications: <ul style="list-style-type: none"> • Add an option for manufacturers to use surplus ZEV and near zero emission vehicle (NZEV) credits generated in one state that has adopted the ACT regulation to assist with meeting their ACT compliance obligations in another state. The proposed pooling flexibility implements a declining annual credit transfer allowance for the 2027 through 2031 model years that dictates how many credits can be transferred in a given year into a state with a deficit. These allowances would begin at 20% in 2027 and decrease by 2% each year, reaching 12% in 2031. The credit transfer allowance would then be constant at 10% for the 2032 through 2035 model years. • Modify the Low Tractor Volume provision to permit manufacturers to offset a portion of deficits generated in the Class 7-8 tractor group with Class 2b-3 or Class 4-8 group ZEV credits for each model year. • Decrease the minimum all-electric range threshold for NZEVs after the 2030 model year.

<ul style="list-style-type: none"> • Provide manufacturers increased flexibility with respect to the order in which they retire ZEV credits. • Modify the communication protocols with respect to the ZEV connector criteria in the ZEP Certification regulation.
7. Objective and rationale, including the nature of urgent problems where applicable: Protection of the environment
8. Relevant documents: No. 22-Z, California Regulatory Notice Register 30 May 2025 pages 13-18: https://oal.ca.gov/wp-content/uploads/sites/166/2025/05/2025-Notice-Register-No.-22-Z-May-30-2025.pdf Notice of Public Hearing (Deadline to Submit Public Comments: 14 July 2025, or at the Public Hearing) Staff Report: Initial Statement of Reasons Appendix A-1: Proposed Regulation Order Appendix B-1: Proposed Amendments to the California Standards and Test Procedures for New 2021 and Subsequent Model Heavy-Duty Zero-Emission Powertrains WTO Members and their stakeholders are asked to submit comments to the USA TBT Enquiry Point . Comments received by the USA TBT Enquiry Point from WTO Members and their stakeholders by 4pm Eastern Time on 14 July 2025 will be shared with CARB if received within the comment period.
9. Proposed date of adoption: To be determined Proposed date of entry into force: To be determined
10. Provision of comments: Final date for comments: 14 July 2025 [] 60 days from notification Deadline to Submit Public Comments: 14 July 2025, or at the Public Hearing on 25 July 2025 Contact details of agency or authority designated to handle comments regarding the notification: Please submit comments to: USA WTO TBT Enquiry Point, Email: usatbtep@nist.gov