

Proposed Amendments to the "Procedures for Exemption of Add-On and Modified Part(s) for On-Road Vehicles/Engines" Specific to Electric Vehicle Conversions March 23, 2023 Sacramento, CA

Objectives and Scope

- Propose amendments to the on-road aftermarket procedure
- Streamline the application process for EV conversions
- Continue to protect emission benefits of CA standards



Vehicle Code Antitampering Provisions

- Vehicle Code prohibits modifications that may impact emission performance unless:
 - Modifications have no adverse impacts, and
 - Modifications reviewed/approved by CARB



Aftermarket parts procedures detail the process for approval



Aftermarket Parts Evaluation Procedures

- Original procedure adopted in 1990
 - Last amended in 2021
- Applies to wide variety of aftermarket parts
 - Primarily focused on assessing emission impacts
- EV conversions are covered by the Procedure but it does not account for their unique nature



Need for Changes

- Existing process highly focused on assessing regulated emission impacts
- EV conversions are unique as they completely replace the original engine
- Procedure's lack of relevant criteria for EV conversions can hinder market offerings



General Goals

- Provide an explicit path for EV conversion approval with suitable evaluation criteria
- Impose no additional requirements
- Allow applications to cover broader range of vehicles
 - Fewer applications will reduce certification-related fees for the parts manufacturer



Proposed Amendments

- Clarify application, evaluation process, and label requirements
 - Define applicability
 - Add relevant definitions
- Broaden application coverage based on vehicle class
 - Add flexibility for portions of the application corresponding to this broader class



Projected Benefits

- There are no anticipated adverse impacts, costs, or disbenefits
- Provides a clearer and more streamlined application process
- May reduce costs to conversion kit manufacturers



Projected Benefits (Continued)

- May have small but unquantifiable air quality benefits
- No jobs or businesses will be created or eliminated
- No anticipated environmental justice impacts



Public Outreach

- CARB staff met with stakeholders during development of the amendments
- Draft language released for comment
- Received comments from stakeholders
- Incorporated some changes based on feedback



Recommendation

Staff recommends adoption of the proposed amendments to title 13, sections 2222 and 2224 and the incorporated Procedure

