

DATE: DECEMBER 19, 2019

MANUFACTURERS ADVISORY CORRESPONDENCE (MAC) 2019-02

TO: ALL MANUFACTURERS OF MEDIUM-DUTY VEHICLES EXCEPT
MEDIUM-DUTY PASSENGER VEHICLES

SUBJECT: ENVIRONMENTAL PERFORMANCE LABEL REQUIREMENTS FOR
MEDIUM-DUTY VEHICLES MANUFACTURED ON AND AFTER JANUARY
1, 2021.

This letter transmits a MAC that outlines the process for implementing new Environmental Performance Label requirements for chassis-certified medium-duty vehicles, manufactured on or after January 1, 2021. The requirements apply to medium-duty vehicles with 8,501 to 14,000 pounds gross vehicle weight rating (GVWR) but not to medium-duty passenger vehicles (MDPV)¹. The MAC discusses the label approval process, both for required Environmental Performance Labels and such labels voluntarily affixed on vehicles manufactured prior to January 1, 2021.

If you have any questions regarding the Environmental Performance Label format, please contact Ms. Mitzi Magtoto, Air Resources Engineer, Strategic Planning and Development Section, at (916) 323-8975 or by e-mail at Mitzi.Magtoto@arb.ca.gov. For label rating approval, please contact Mr. Steven Hada, Air Resources Engineer, On-Road Light-Duty Certification Section, at (626) 575-6641 or by e-mail at Steven.Hada@arb.ca.gov.

Sincerely,



Allen Lyons, Chief
Emissions Certification and Compliance Division

Attachments (2)

¹ In Title 13, California Code of Regulations, section 1900(b)(12), MDPV means any medium-duty vehicle with a GVWR of less than 10,000 pounds that is designed primarily for the transportation of persons.



**State of California
CALIFORNIA AIR RESOURCES BOARD**

MANUFACTURERS ADVISORY CORRESPONDENCE (MAC) 2019-02

SUBJECT: Implementation of Environmental Performance Label requirements for medium-duty vehicles

APPLICABILITY: New complete 2021 and subsequent model year (MY) chassis-certified medium-duty vehicles, pick-up trucks and vans¹, with 8,501 to 14,000 pounds gross vehicle weight rating (GVWR), manufactured on or after January 1, 2021. This excludes vehicles manufactured by small businesses.

New complete 2022 and subsequent MY chassis-certified medium-duty vehicles, pick-up trucks and vans, with 8,501 to 14,000 pounds gross vehicle weight rating and manufactured by small business manufacturers, are subject to this requirement starting from January 1, 2022.

Affixing an Environmental Performance Label to a medium-duty vehicle manufactured before January 1, 2021 (or before January 1, 2022 for vehicles manufactured by a small business) is optional, but the manufacturer needs to obtain approval for label values and format prior to affixing it to vehicles.

Medium-duty vehicles subject to light-duty standards are excluded from these requirements.² Hence, medium-duty passenger vehicles³ are not subject to this MAC.

Incomplete medium-duty vehicles are not subject to the Environmental Performance Label requirements, and, therefore, are not subject to this MAC.

The Greenhouse Gas (GHG) and Smog Ratings discussed in this MAC are determined pursuant to sections 4 and 5 of the "California Environmental Performance Label Specifications for

¹ Class 2b and 3 vehicles referred to in Phase 2 GHG rules as pick-up trucks and vans. Complete pick-up trucks and vans, including all work vans and 15-passenger vans are covered in these requirements.

² "Medium-duty vehicle" means any heavy-duty low-emission, ultra-low-emission, super-ultra-low-emission or zero-emission vehicle certified to the standards in title 13, CCR §§1961(a)(1), 1961.2, 1962, 1962.1, except medium-duty passenger vehicles, having a manufacturer's gross vehicle weight rating between 8,501 and 14,000 pounds. (Title 17, CCR, section 95662(a)(15))

³ "Medium-duty passenger vehicle" (MDPV) has the meaning given in title 13, CCR §1900. (Title 17, California Code of Regulations, section 95662(a)(14))

2021 and Subsequent Model Year Medium-Duty Vehicles, except Medium Duty Passenger Vehicles”, as adopted December 19, 2018.

REFERENCES: Title 13, California Code of Regulations (CCR), Section 1965 and “California Environmental Performance Label Specifications for 2021 and Subsequent Model Year Medium-Duty Vehicles, except Medium Duty Passenger Vehicles”, as adopted December 19, 2018.

Sections 86.1819-14 and 86.1803-01, subpart S, Part 86, Title 40, Code of Federal Regulations (CFR), as last amended by the U.S. Environmental Protection Agency (EPA) on October 25, 2016.

Appendix VI, Part 600, Title 40, CFR, as last amended by the U.S. EPA on July 6, 2011.

Section 1036.801, subpart I, Part 1036, Title 40, CFR, as last amended by the U.S. EPA on October 25, 2016.

Section 1037.801, subpart I, Part 1037, Title 40, CFR, as last amended by the U.S. EPA on October 25, 2016.

BACKGROUND: Environmental Performance Labels are already required on light-duty vehicles, including passenger cars, light-duty trucks up to 8,500 pounds GVWR, and medium-duty passenger vehicles up to 10,000 pounds GVWR. The California Air Resources Board (CARB) began requiring a consumer window label called a Smog Index Label on new light-duty vehicles beginning with the 1998 MY. The label provided consumers with an indication of the relative emission contribution of these new vehicles for smog forming exhaust emissions of non-methane organic gases, oxides of nitrogen, and evaporative hydrocarbons.

In 2005, Assembly Bill 1229 (Nation) was signed, requiring CARB to revise the existing Smog Index Label to include global warming gas emissions information. The revised label requirements, referred to as a California Environmental Performance Label, took effect for 2009 MY light-duty vehicles sold in California. Federally, as required by the Energy Policy and Conversation Act, fuel economy labels have been displayed on the window sticker of all new passenger cars and light-duty trucks as well. In 2007, per the Energy Independence and Security Act, the federal Fuel Economy Labels must reflect a car’s fuel economy, GHG emissions, and other emissions over its useful life, as well as a rating scheme that

makes it easy for consumers to compare at point of purchase. The federal Fuel Economy and Environment Label was required on all 2013 and subsequent MY light-duty cars.

CARB harmonized its California Environmental Performance Label with the Federal Fuel Economy and Environment Label requirements in 2012, and thus the federal label became sufficient to meet both California and federal requirements beginning in 2013 MY. While most light-duty vehicles in California are using Federal Fuel Economy and Environment Labels, the California Environmental Performance Label remains in California regulation, and is not required for passenger cars, light-duty trucks, and medium-duty passenger vehicles, if they meet the federal label requirement.

As part of the California Phase 2 GHG regulation, CARB is requiring Environmental Performance Labels for new chassis-certified medium-duty vehicles with GVWR of 8,501 to 14,000 pounds, manufactured on or after January 1, 2021. Staff refers to Environmental Performance Labels as the consumer labels placed on new vehicle windows when the vehicles are displayed for sale.

PROCESS:

Approval of Environmental Performance Label

A request for approval must contain the following two parts:

1. Data, including label values, necessary to determine the GHG and Smog Ratings

Requests for GHG and Smog Ratings approval shall be submitted to the On-Road Light-Duty Certification Section, through CARB's Document Management System (DMS). Please refer to the CARB DMS website at <https://ww3.arb.ca.gov/msprog/dms/dms-2.htm#userguide> for guidance on how to upload documents into the DMS system. The website also provides information on how to register, sign up for training, and submit documents to workflow processes.

GHG and Smog Ratings Approval

The following information shall be submitted in the attached format by test group or label group (if using label group).

For Each Test or Label Group:

- Model Year
- Manufacturer
- Make
- Model name within the test or label group
- Test group (12 characters)
- Label group
 - If the manufacturer did not split the test group into label groups, put "NA."
 - If manufacturer split the test group into label groups, use 1, 2, 3, and so on.

Test Group	Label Group
HMMXD06.5678	NA
HMMXD08.0123	1
HMMXD08.0123	2

- California emissions standard category
- Smog rating
- Fuel Type
- Zero-emission vehicles (Yes/No)
- Flexible-fuel and dual-fuel vehicles (Yes/No)
- Carbon dioxide (CO₂) City (Federal Test Procedure)
- CO₂ Highway (Highway Fuel Economy Test)
- Combined CO₂ emissions
- CO₂ City value if based on ADCO₂
- CO₂ Highway value if based on ADCO₂
- Combined CO₂ value if based on ADCO₂
- GHG rating
- Other Supporting Documents - Data to support how CO₂ city, CO₂ highway, or ADCO₂ value is calculated for each test group or label group

As mentioned above, submit requests through CARB's DMS. Please submit the data in the excel format provided in Attachment 2 to this MAC.

2. A sample Environmental Performance Label to evaluate the format in accordance with the requirements.

Requests for label format approval shall be submitted to:

Mitzi Magtoto
California Air Resources Board
Mobile Source Control Division
1001 I Street,
Sacramento, CA 95814
Email: Mitzi.Magtoto@arb.ca.gov

Label Format Approval

To facilitate compliance with these requirements, staff developed an Environmental Performance Label design tool in Adobe InDesign format that contains all of the graphic elements and instructions necessary to create labels. The design tool is provided upon email request to Mitzi Magtoto at Mitzi.Magtoto@arb.ca.gov. Hence, manufacturers may still use their own program to create labels. This design tool is provided to manufacturers to use only for meeting these regulatory requirements, and should be distributed only as needed within your company.

Additionally, staff developed a label template that manufacturers can use to help with compliance. This label template is provided upon email request to Mitzi Magtoto at Mitzi.Magtoto@arb.ca.gov. Manufacturers would add their necessary label information (such as vehicle fuel type) on the upper right corner, and GHG and smog ratings in the slider bars.

Prior to displaying the new Environmental Performance Label on any vehicle, the manufacturer must submit a sample label to CARB (c/o Mitzi Magtoto) for format review and approval. Only one sample label per manufacturer is required for format and size approval. Staff will be looking for label color, size, font, style, and overall specification compliance.

If the manufacturer plans to place the Environmental Performance Label within the vehicle's Monroney sticker, staff will require a sample of the entire Monroney sticker with the new Environmental Performance Label displayed. Alternatively, if the Environmental Performance Label is to be placed on label feedstock that contains other vehicle information, the sample label must include the other vehicle information to be displayed. Finally, if a sample label is not immediately available due to feedstock ordering lead time, staff will accept a portable document file (pdf) copy of the

proposed label for review and issue a conditional approval. However, once the feedstock is available with the new label format, the manufacturer must submit a sample label to staff for final approval.

The environmental performance label should meet all the requirements specified in section 9 of the "California Environmental Performance Label Specifications for 2021 and Subsequent Model Year Medium-Duty Vehicles, except Medium Duty Passenger Vehicles", as adopted December 19, 2018.

Label Compliance

As part of the regulatory requirements, manufacturers must submit one copy of an actual label for its vehicle fleet per model year within 90 days after the end of the model year to CARB to:

Duc Nguyen
California Air Resources Board
On-Road Light-Duty Certification Section
Emissions Certification and Compliance Division
9480 Telstar Avenue, Ste. #4
El Monte, CA 91731