

Manufacturers Advisory Correspondence (MAC) ECCD-2025-01

To: All Manufacturers of Small Off-Road Engines
All Manufacturers of Equipment using Small Off-Road Engines
All Manufacturers of Small Off-Road Engine Evaporative Emission Control System Components
All Persons Selling, Leasing, Delivering, Importing, or Offering for Sale or Lease Small Off-Road Engines or Their Evaporative Emission Control System Components in California

From: Robin U. Lang, Chief, Emissions Certification and Compliance Division



Date: January 22, 2025

Subject: Guidance for Model Year 2024 and 2025 Small Off-Road Engines

This letter transmits a Manufacturers Advisory Correspondence (MAC) that clarifies the implementation of the small off-road engine regulations for model year 2024 and 2025 small off-road engines.

If you have any questions related to this MAC, please [contact Timothy Antcliff](#), Vehicle Program Specialist.

State of California
Air Resources Board

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Subject: Guidance for Model Year 2024 and 2025 Small Off-Road Engines
Applicability: 2024 and 2025 Model Year Small Off-Road Engines
References: 1. Title 13, California Code of Regulations, §§ 2400-2409
2. Title 13, California Code of Regulations, §§ 2750-2774
3. Section 209(e) of the Clean Air Act

Issue:

The U.S. Environmental Protection Agency (EPA) has granted the California Air Resources Board's (CARB) authorization request for the 2016 and 2021 amendments to the small off-road engine (SORE) regulations. On January 6, 2025, U.S. EPA published its *Notice of Decision* in the Federal Register.¹ Because model year 2025 is already underway, this MAC describes the transition to full implementation of the regulations.

Background:

On December 9, 2021, CARB approved for adoption more stringent exhaust and evaporative emission standards and requirements for model year 2024 and subsequent SORE. CARB submitted a request on December 20, 2022, that U.S. EPA grant California authorization to enforce CARB's 2016 amendments to the evaporative emission regulations as well as the 2021 amendments to the SORE regulations under Section 209(e) of the Clean Air Act.² U.S. EPA held a public hearing on June 27, 2023, and provided a public comment period from May 23, 2023, to July 28, 2023, to consider CARB's request.³

Policy:

CARB will focus on education and outreach to stakeholders in 2025 and will fully implement the amendments to the SORE regulations beginning with model year 2026. Because the authorization for the amendments was issued after model year 2025 was underway, CARB will issue Executive Orders (EO) for the remainder of model year 2025 that certify the engines or equipment to model year 2023 standards.⁴ Manufacturers may certify to the model year 2025 standards as well.

¹ 90 Fed. Reg. 640, Jan. 6, 2025.

² 42 U.S.C. § 7543(e).

³ 88 Fed. Reg. 33,143, May 23, 2023.

⁴ 90 Fed. Reg. 640-642, Jan. 6, 2025; 80 Fed. Reg. 76,971, Dec. 11, 2015; 71 Fed. Reg. 75,536, Dec. 15, 2006.

Engines and equipment certified for model year 2024 or 2025 may continue to be imported into California and introduced into California commerce. Evaporative emission control system components certified for use on engines through model year 2022, 2023, or 2024 may be referenced on certification applications for model year 2025 engines.

Beginning with model year 2026, all new engines and equipment that are manufactured for sale, sold, or offered for sale in California, or that are introduced, delivered, or imported into California for introduction into commerce must be certified to the standards applicable under the regulations for model year 2026 and later.

All new small off-road engines and equipment that are manufactured for sale, sold, or offered for sale in California, or that are introduced, delivered, or imported into California for introduction into California commerce must be covered by EOs and must comply with the terms set forth in their respective EOs.