



Comments on the proposed ACC II Amendments

Pagani S.p.A.

*Federico Righi – Head of Homologation
Mattia Teggi – Certification Engineer*

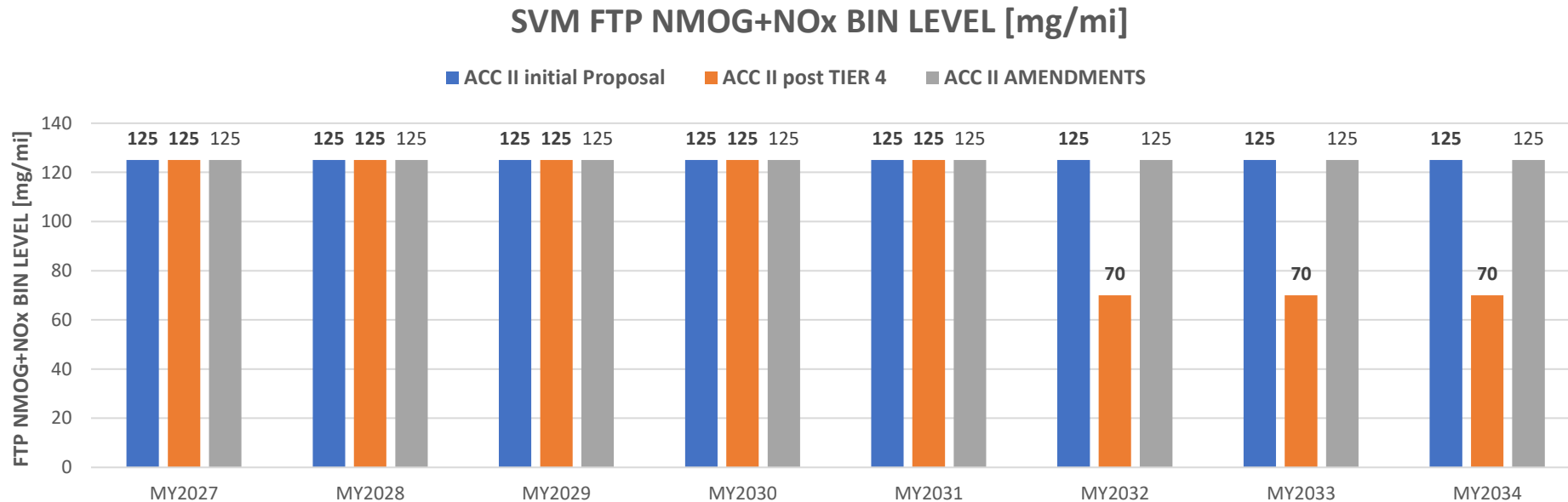
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- Pagani supports the Proposal - Eliminate “Cleaner Car” Provision (Slide 15)**

Without the abolition of this provision, the BIN 125, which was expected to be available for SVM until 2034 at the time of ACC II publication, will be no more available starting from 2032 for SVMs, so 3 years earlier respect to the initial plan.

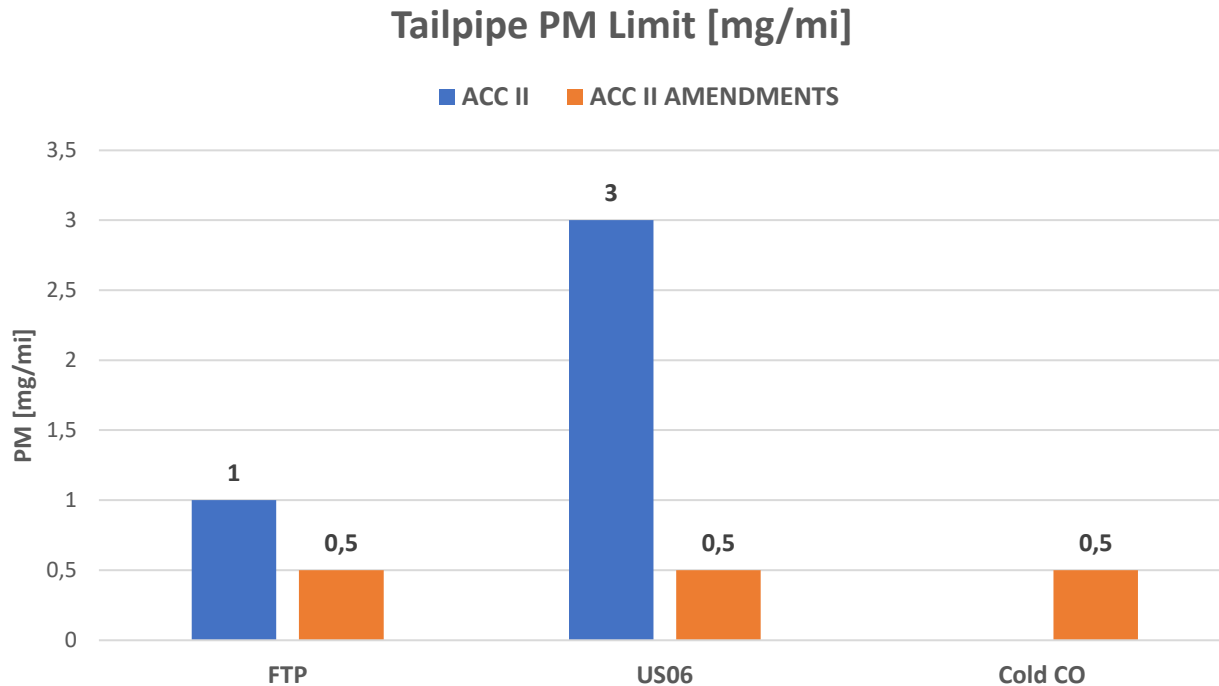


Moreover, at the time of ACC II publication, SVMs could count on the possibility to certify in California BIN125 vehicles later than 2031 but the “Cleaner Car” Provision after EPA Tier4 publication cancelled this possibility.





- Pagani concern regarding LD Particulate Matter Emission (PM) Standards (Slide 16)



ACC II Amendments proposed PM reduction to 0.5mg/mi across both the FTP, US06, Cold CO will require Gasoline Particulate Filters (GPFs) with advanced technologies installed on high performance cars. At the same time, its OBD burden is not currently fully understood in terms of aging and monitoring.

There are also technical issues and costs associated with measuring PM emissions below 1 mg/mile, and specialized, expensive test facilities may be needed to reliably measure PM at such a low level.

GPF technologies request high investments in terms of time and costs.

Current ACC II allows PM limits reachable without the implementation of GPFs but with specific technologies and high level of engine calibration.

Ultra small volume manufacturer product have an average of 10 years old lifecycle, therefore it is important to address the electrification efforts defined by the latest ACC II amendments after 2034.





- **Pagani concern regarding Light-Duty Greenhouse Gas (GHG) Standards (Slide 32)**

Ultra-small volume manufacturers represent a tiny fraction of the US automobile market. The percentage is so small that the companies have a minuscule impact on US air pollution.

As example, for EPA's may 2023 NPRM proposal, a group of five ultra-SVMs underlined that they collectively sold about 100 cars in the US in 2022 -- a mere 0.003% of the 2.9 million US passenger car sales for that year.

Additionally vehicles sold by ultra-SVMs are not "daily drivers" but rather "occasional use" collectors cars. As a result, the average annual milage driven by these vehicles is drastically less than -- perhaps 25% of -- the average annual milage of a typical passenger car. Fewer miles driven is one way to reduce vehicular pollution.

In short, niche vehicles produced by ultra-SVMs have a negligible effect on the global impact regarding GHG.

In continuity with the past, EPA has recognized the ultra-SVMs peculiarity in the latest "Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles". In fact, under 40 CFR 86.1818-12 "*Small manufacturers may produce no more than 500 exempt [to the greenhouse gas standards] vehicles in any model year*".

For the above mentioned reason, Pagani sponsors the adoption of the EPA provision for the ACC II amendments, thus simplifying the procedure set by the regulators.

