ESCA | Comment to CARB Drive Forward Light-Duty Vehicle Progamme

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European Small Volume Car Manufacturers Alliance
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ESCA'S COMMENT FOR CARB DRIVE FORWARD LIGHT-DUTY VEHICLE PROGRAM

ESCA appreciates the opportunity to provide comments on the California Air Resources Board's (CARB) Drive Forward initiative and acknowledges CARB's continued efforts to develop a regulatory framework that supports California's environmental objectives while fostering innovation within the automotive sector.

As an alliance composed of manufacturers of high-performance, low-volume vehicles, ESCA recognizes the importance of regulations that are both environmentally effective and proportionate to the diversity of vehicle manufacturers operating in the market.

In this context, ESCA would welcome the opportunity to engage with CARB in future discussions regarding the treatment of small-volume manufacturers under the Drive Forward framework. We believe that continued dialogue would help ensure that the regulatory approach appropriately reflects the unique characteristics, limited production volumes, and business models of this segment while maintaining alignment with California's policy objectives.

Pending any future review of these provisions, ESCA encourages CARB to maintain the existing regulatory treatment and compliance provisions applicable to small-volume manufacturers, as established under the ACC II regulation. Preserving these provisions would provide important regulatory continuity and certainty during the transition to the new regulatory framework.

Regulatory continuity is particularly important in the current period of uncertainty surrounding the broader vehicle emissions regulatory landscape. Maintaining the existing ACC II provisions would provide a stable and predictable framework for compliance and product planning while allowing sufficient time for a thoughtful evaluation of any future changes through stakeholder engagement.

As one example, under the ACC II regulation, the provisions associated with BIN 125 remain available for eligible small-volume manufacturers through Model Year 2034. Removing this provision under the Drive Forward framework would introduce an inconsistency with the existing regulatory structure and reduce regulatory predictability during the transition. Retaining the current ACC II provisions would therefore support a more orderly implementation while allowing CARB to consider any future revisions through a dedicated discussion with stakeholders.

ESCA

The European Small Volume Car Alliance

Established in 2009, ESCA is the trade body for Europe's car manufacturers who produce fewer than 10,000 cars registered within the EU per year.

Our members are responsible for some of the world's most recognisable, iconic and innovative brands, breaking the mould in the automotive industry.

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