Equipment Manufacturers Institute

Presentation to the

EPA Nonroad Diesel Engine Rulemaking 16 January 2001 Meeting Alexandria, VA

Nonroad Issues

- Diversity of Products and Low Volume Models
 - Globalization USA: Within and Between, Europe & Japan
- Fuel
 - Cost
 - Multiple Fuel Streams Impact
- Market Elasticity
 - Competition
 - Repair of Existing Machines
 - Substitution With Less Effective Systems
 - Farmers Have Global Competition

The Heavy Equipment Industry Mission

We, the Agricultural and Construction Machinery Manufacturers, build the most applicable the most durable the most reliable the most productive the most powerful the most repairable the lowest emissions the quietest the safest the most recyclable the easiest to operate the easiest to maintain

machines that the customer will purchase.

Products and Models

- Agricultural and Construction Machines Are Designed for Specific Uses
 - Tractors, Harvesters, Loaders, Hauling Machines, Excavators, Etc.
- Many Models Are Derivatives of Base Machines
 - Derivative Models Are Very Specific Purpose
 - Design of These Is Not Changed Frequently
- Global Harmonization Is the Only Way to Provide for the Limited Production

– Volume of a Global Market Needed to Sustain Viability

Fuel

- Agricultural and Construction Locations
 - Very Diverse Locations and Use of Multiple Fuels
 - Adding More Fuel Streams Adds More Complexity and Expense
 - Fuel Costs Are Major Expense for Farmers, Earthmoving and Mining

Cost and Usage of Fuel in Farming



Table 1—Fuel purchased for farm use, 1974-951			
Year	Gasoline	Diesel	LP gas
	Billion gallons		
1974	3.7	2.6	1.4
1975	4.5	2.4	1.0
1976	3.9	2.8	1.2
1977	3.8	2.9	1.1
1978	3.6	3.2	1.3
1979	3.4	3.2	1.1
1980	3.0	3.2	1.1
1981	2.7	3.1	1.0
1982	2.4	2.9	1.1
1983	2.3	3.0	0.9
1984	2.1	3.0	0.9
1985	1.9	2.9	0.9
1986	1.7	2.9	0.7
1987	1.5	3.0	0.6
1988	1.6	2.8	0.6
1989	1.3	2.5	0.7
1990	1.5	2.7	0.6
1991	1.4	2.8	0.6
1992	1.6	3.1	0.9
1993	1.4	3.3	0.7
1994	1.4	3.5	0.9
1995	1.4	3.6	0.8

¹ Excludes Alaska & Hawaii and fuels used for household and personal business.

Source: USDA, ERS, based on data gathered by



Time

Emission Tradeoffs



Emissions



Emissions Reduction Steps



Period of stability is a necessary facet because manufacturers must have some time to develop and design products and then amortize the technology and facilities involved. Also, there needs to be stability at the marketing level and with customers.

Tier 22 used to denote that we must consider the long term and recognize that there will be many steps to achieve the desired emissions reduction.



Conclusions

- Customers Must Continue to Purchase New Machines
 - Only Way to Get Lower Emissions Machines Put to Use
 - Manufacturers Need Continued Revenue to Develop Successive Tiers
- Lead-time and Periods of Stability Are Required
- Flexibility Balance Tier Effectivity With Design Cycle of Machines - Including Derivative Models
 - Averaging, Banking, Phasing, Staggering, etc.
- Global Harmonization Is an Imperative Because of the Global Market & Global Competition
- System Aspects of Engine, Machine and Fuel Technology Must Be Worked Together
- Any regulation must truly add value

Cooperation Between Developed Regions

- Participate in a Forum Where the Issues Can Be Presented and Concluded
 - TABD Recommendation
 - Timeframe End of March / Early April
 - Venue Brussels
- Developed Regions of the Globe Work Together for Harmonization of Requirements for Same Engine / Machine Design
- Transparency of Certification Requirements to Enable Trade Between Regions