

Environmental Defense Fund

Public Hearing on EPA's Proposed Rule - Revision of Tier 4 Criteria Pollutant Standards, Part 1: Amendments to Phase-In Schedule for Light-Duty and Medium-Duty Vehicles

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Testimony by Rishab Jagetia

Hello, my name is Rishab Jagetia. I am testifying today on behalf of EDF's more than 3 million members who support clean air protections.

EDF is opposed to any delay or weakening of the life-saving Tier 4 emissions standards that will significantly reduce air pollution from cars, passenger trucks, and SUVs starting in model year 2027. A 2-year delay in these provisions will cause more serious heart and lung diseases and early deaths for Americans across the country and result in billions of dollars in health harms.

Vehicle standards save lives

Protective emission standards for highway vehicles are a critical tool in reducing the soot and smog in the air we breathe caused by fine particulate matter, nitrogen oxides, and non-methane organic gases. These pollutants cause respiratory illnesses, cardiovascular disease, and even premature death, and are particularly damaging to communities near transportation corridors.

Children, older adults, and people with pre-existing conditions are especially vulnerable to the harmful effects of tailpipe pollution. In 2024, EPA estimated that the Tier 4 standards would reduce tens of thousands of tons of fine particulates and NO_x pollution by 2055 and provide \$13 billion in annual health benefits. A 2-year delay would cost our nation billions of dollars in health harms and cause hundreds of additional premature deaths.

The Tier 4 standards are feasible and affordable

Manufacturers are already building new cars and trucks using low-cost technologies that reduce this harmful pollution and meet EPA's Tier 4 standards. Many carlines have already shown their ability to comply with the NMOG+NO_x standards – over 25% of model year 2025 and 2026 cars tested under the 15 mg/mile standard set by Tier 4, according to EPA data. And an [EPA-MECA demonstration](#) found it would cost less than \$100 per vehicle to comply. The gasoline particulate filters used to protect against deadly particulate pollution have been deployed successfully across the world for nearly a decade and are now found on models in the U.S. where they represent [less than one percent](#) of a vehicle's price. EPA's final rule also built in flexibilities to help ensure smooth and durable implementation.

Protective emissions standards for highway vehicles are a vital tool in reducing harmful tailpipe pollution. Americans cannot afford to pay for pollution increases, whether with their lives or their wallets. We urge EPA to abandon this harmful proposal and implement Tier 4 standards to cut pollution and protect people in communities across the country.