

Dec 6, 2022

New Docs Reveal Truck Makers' Coordinated Campaign Against Climate Plan *Industry lobbying lawmakers in multiple states against the Advanced Clean Truck (ACT) rule*

The US truck manufacturing sector is directly lobbying lawmakers across multiple states as part of a coordinated campaign against the adoption of the Advanced Clean Truck (ACT) rule, *new research* by climate think tank InfluenceMap shows.

It also shows how the industry's key industry association - the Truck and Engine Manufacturers Association (EMA) – is pushing to stop the federal Environmental Protection Agency (EPA) from allowing California to adopt the plan.

The ACT rule, first passed by California, would mandate an increasing percentage of medium and heavy duty vehicle sales be zero emissions vehicles.

The analysis draws on publicly-available evidence as well as thousands of pages of previously unseen documents obtained via Freedom of Information (FOIA) requests across 11 states that have either adopted the ACT rule or have signaled their intention to do so. (Links to key state-by-state evidence at the end of press release)

The report shows:

- The EMA has spearheaded the campaign against the ACT rule, by directly lobbying policymakers in at least eight states: **California, Colorado, Maine, Massachusetts, New Jersey, New York, Oregon** and **Washington**.
- **Volvo, Daimler Truck, Volkswagen (Navistar)** and **PACCAR** each lobbied to oppose the adoption of the ACT rule in at least three states, according to FOIA documents.
- **Ford** and **General Motors** appear to have been less directly engaged in lobbying on the policy, yet remain members of the EMA.
- At a federal level, **Volvo, Daimler Truck, Volkswagen (Navistar), PACCAR** and the **EMA** have opposed the US Environmental Protection Agency's (EPA) proposal to tighten existing "Phase 2" emissions standards.

The report also details how the industry has deployed a climate-positive PR campaign, while at the same time lobbying against stricter emissions regulations. This includes a 'Clean Truck Facts' website - operated by the EMA - which pushes back against more stringent federal tailpipe emission rules.

A separate campaign – 'Partners for a Zero Emission Vehicle Future' – declares that it supports the rollout of zero emissions trucks, but warns other states against adopting the ACT rule. **Daimler Truck, Volvo, PACCAR, Navistar** (a **Volkswagen** subsidiary) are founding members of this group and have used it to lobby state lawmakers.

In the US, the transport sector accounts for 27% of greenhouse gas emissions – a quarter of which was generated by medium and heavy duty vehicles in 2020. In November 2022, the US signed a global agreement committing to 100% new zero-emission medium and heavy-duty sales by 2040.

InfluenceMap Analyst Kalina Dmitriew said: “By analyzing hundreds of documents obtained through freedom of information requests, we’ve been able to piece together the industry’s coordinated strategy to undermine the Advanced Clean Truck rule and its adoption in various parts of the country.

“This behind-the-scenes lobbying effort direct to state lawmakers appears to run contrary to the industry’s public pro-climate PR strategy.

“The truck manufacturing industry’s negative lobbying is undermining efforts to decarbonize the sector and poses a major risk to US climate targets – including the 2040 goal to only sell zero-emissions trucks.”

STATE-LEVEL LOBBYING ON THE ADVANCED CLEAN TRUCK (ACT) RULE BY KEY MHDV INDUSTRY PLAYERS IN THE US

	 Truck & Engine Manufacturers Association						
CALIFORNIA	×				×	×	
NEW JERSEY	×	×	×	×	×		
NEW YORK	×	×	×				
MASSACHUSETTS	×						
OREGON	×	×		×	×		
WASHINGTON	×						
MAINE	×						
COLORADO	×	×	×	×	×		
CONNECTICUT							
MARYLAND							
VERMONT							

KEY

- STATES THAT HAVE ADOPTED THE ACT RULE
- STATES THAT HAVE SIGNALLED INTENTION TO ADOPT THE ACT RULE
- ENTITY HAS HAD NEGATIVE ADVOCACY ON THE ADOPTION OF THE ACT RULE
- NO LOBBYING EVIDENCE ON ACT RULE FOUND

[Click here for the full report.](#)

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About InfluenceMap

InfluenceMap is a London-based think tank with offices in Tokyo, Seoul, and New York. It provides data driven analysis on issues related to energy and climate change. Our metrics for measuring corporate influence over climate policy are used by investors, including the global Climate Action 100+ investor engagement process.

Summary of key state-based evidence

(Full details available in Appendix 2 of the report)

California: The EMA *opposed* the ACT rule in a June 2020 consultation response obtained via FOIA request, *warning* in a different consultation response submitted in the same month that the “proposed myopic regulatory mandate is likely to compel manufacturers to abandon the California market”. *Volvo Group* and *General Motors* also advocated to weaken aspects of the plan.

New Jersey: In June 2021 consultation responses found via FOIA request, *Volvo*, *Daimler Truck* and *EMA* appeared to oppose the proposed adoption of the ACT rule, emphasizing concerns around costs and charging infrastructure roll-out, and instead advocated for a nationwide federal program to decarbonize MHDVs. In July 2021, the same organisations – *Volvo*, *Daimler Truck*, *EMA*, plus *PACCAR* and *Navistar* – wrote a joint letter to the Governor of New Jersey, as members of the Partners for a Zero Emission Vehicle Future coalition, further opposing the state’s proposed adoption of the rule.

New York: InfluenceMap found evidence via FOIA requests of EMA, Volvo, PACCAR, Daimler Truck and Navistar strongly opposing New York’s adoption of the Advanced Clean Truck (ACT) rule in a November 2021 *oral testimony* and *consultation response* submitted by the Partners For Zero Emission Vehicle Future (PZEVF) coalition (of which all entities are members). EMA opposed the rule in a November 2021 *oral testimony*, a November 2021 *consultation response*, and a *March 2021 letter*, all found via FOIA request. It also *appeared to oppose* New York’s proposed adoption of the ACT rule in a December 2021 consultation response, stating “while EMA supports the New York Department of Environmental Conservation’s push to accelerate the deployment of ZEV trucks, we strongly oppose the proposed opt-in to the CARB’s ACT regulation as the means to reach that shared objective”. Kenworth, a subsidiary of PACCAR, also *opposed* the ACT rule in New York in a November 2021 letter found via FOIA request.

Massachusetts: EMA appeared to oppose Massachusetts’ adoption of the ACT rule in *February* and *March* 2022 consultation responses, both found via FOIA requests. It *argued* that “a ZEV-deployment strategy that is centered around CARB’s Rules will more likely frustrate rather than foster the acquisition and use of ZEV trucks in Massachusetts, will hurt the Commonwealth’s economy, and will impede any envisioned environmental gains”.

Oregon: In October 2021 emails found via FOIA request, *Volvo*, *Navistar* and *Daimler Truck* appeared to oppose Oregon’s proposed adoption of the ACT rule. Daimler Truck further appeared unsupportive of the adoption of the rule in a January 2021 *presentation* prepared for Oregon’s Department of Environmental Quality and an August 2021 *email* from Sean Waters, vice president of regulatory affairs at the company. In the presentation, Daimler Truck *urged* the state to “avoid an unattainable mandate to force percentages of sales or purchase to be zero emission”, arguing that “a too aggressive sales mandate may not be feasible to satisfy in the marketplace”. EMA appeared to oppose Oregon’s proposed adoption of the ACT rule in *December 2020* and *September 2021* consultation responses and a *January 2021* letter (found via FOIA request), as well as in an *August 2021* consultation response.

Washington: EMA appeared to oppose Washington’s proposed adoption of the ACT rule in an *oral testimony* at a Washington Department of Ecology public hearing in July 2021, as well as in an August 2021 *consultation response*.

Maine: In Maine, which has signalled its intention to adopt the ACT rule, EMA *argued* in an October 2021 email to the state's Department of Environmental Protection, obtained via FOIA request, that "a ZEV-deployment strategy that is centred around the ACT rule will more likely frustrate rather than foster the acquisition and use of ZEV trucks in Maine, will hurt the State's economy, and will impede any envisioned environmental gains". EMA also appeared to oppose Maine's adoption of the ACT rule in a November 2021 *oral testimony* and an October 2021 *comments* sent by email, both also obtained via FOIA request. Lobbying in Maine appears to have derailed the adoption process.

Colorado: Lobbying from the EMA and its members has been particularly prominent in Colorado, which has signaled its intention to adopt the ACT rule. As well as *opposing* Colorado's adoption of the rule in an April 2022 consultation response, at a December 2021 Colorado Clean Trucking Strategy working group meeting, Sean Waters, then chair of the EMA and vice president of regulatory affairs at Daimler Truck, *explicitly stated* "we strongly oppose the ACT rule". Waters also *appeared unsupportive* in a March 2021 email to Colorado's Department of Transportation found via FOIA request, where he stated "we are committed to a zero emission future, but that isn't going to happen through the ACT rule". EMA and its members *Daimler Truck*, *PACCAR*, *Volvo* and *Navistar* also submitted a consultation response to Colorado's Department of Public Health and Environment in April 2022 (found via FOIA request) as part of the "Partners for a Zero Emission Vehicle Future" coalition, opposing the state's proposed adoption of the ACT rule.