

EPA MY2027 Heavy-Duty NOx Proposal: Action Guide



The public comment period for the EPA 2027 NOx Notice of Proposed Rulemaking closes on August 29th, and your feedback is needed. This guide will provide you with additional information on key areas for comment, a link below (or scan QR to access) to submit your feedback, and next steps.

Comment Deadline	Goal	Why Comment?
August 29, 2026	Provide tangible feedback on availability, uptime, and usability	Specific input is more useful to the EPA than generalized claims of regulatory impact
Comment Link:	Regulations.gov under Docket ID EPA-HQ-OAR-2026-0728	

1. Background & Purpose

As a key industry participant you are encouraged to submit comments to the EPA to address concerns and bring specific examples to light. Your unique perspective helps provide credibility and reinforcement to actions many other industry participants also share views on.

2. Key Provisions and Dealer Comment Guide

The EPA's proposal includes several provisions intended to ease the shift to stricter NOx standards. The table below summarizes each provision, why it matters, and provides key areas for advocacy opportunities.

Policy Area	Impact	Advocacy Opportunity
Non-Conformance Provision (NCP)	Ensures product availability by enabling the sale of current emissions technology with an appropriate per-truck fee, maximizing customer choice.	Highlight that NCP cost matters, and availability does not imply affordability
NCP Costs Matter:	Advocate to the EPA that NCP cost elements should be based on: - DEF costs & ROI calculations of the first owner (generally 2-4 years), not the full 10-year vehicle life - Adjusted to reflect accurate (lower) DEF consumption costs in newer engines.	
Limited Volume Allowance	Allows limited production of engines to support specialty vocational layouts and minimize integration cost.	Might justify a request for expanded specialty product sales volumes and customer needs
Emission Warranty	Retains current emission-related warranty periods.	Highlight customer choice and affordability of optional base and extended warranty options
Useful Life Phase-In	Keeps the current 435k-mile regulatory useful life through MY2029, minimizing cost increases.	Highlight the in-service readiness, parts planning, and value that comes with the phase-in period
DEF Inducement Revisions	Uses audible and visible notifications to indicate DEF-related action while removing power derates and speed limiters.	Highlight that practical notifications and derates related to DEF will keep vehicles on the road, minimize operational disruptions, and maintain compliance

3. Next Steps

Following the 45-day comment period, the EPA will review and consider all feedback submitted before formally announcing the official rule. Thank you in advance for your thoughtful feedback and participation in the EPA rulemaking process.

