

Consumers Union Testimony on Proposed Tier 3 standards

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Philadelphia, PA

My name is Shannon Baker-Branstetter, and I am pleased to offer testimony on behalf of Consumers Union, the policy and advocacy division of Consumer Reports. Consumers Union supports the proposed Tier 3 standards because they are good for air quality, public health and car owners.

Consumer Reports conducts comprehensive tests of approximately 80 new vehicles every year, which we buy anonymously at retail. We provide consumers with objective comparative ratings about performance, fuel efficiency, comfort, handling, safety and reliability of these vehicles. We do not accept outside advertising. Consumer Reports has more than 8 million subscribers to our magazine, website, and other publications.

Reducing sulfur in gasoline and cutting tailpipe emissions will provide outstanding benefits to public health. Over 150 million Americans breathe unhealthy air, and a major source of this pollution is passenger and heavy-duty vehicles. On average, Americans spend over an hour traveling along roads every day. Living, working, or going to school near major roadways increases exposure to ozone and particle pollution that worsens lung and heart health and causes thousands of premature deaths every year.

In addition to the tremendous health benefits, car owners will also see significant improvements. Lowering the sulfur content in gasoline cleans up exhaust from older cars. It also reduces corrosion of emissions control systems for existing vehicles and increases the lifespan of catalytic converters, which can cost hundreds to thousands of dollars to replace. The national average replacement cost of a catalytic converter is about \$1,400.

New car buyers will also benefit. The proposed rule offers automakers an incentive to go beyond the minimum 8 year/80,000 mile warranty currently required for emissions control systems and extend it to 15 years/150,000 miles for new vehicles, which could improve reliability and lower costs to maintain emissions control systems. Low-sulfur gasoline also enables automakers to develop a greater array of technology, such as lean-burn, to meet emissions and fuel economy standards more creatively and at a lower cost.

The very modest cost of these clean car standards is well worth it. Addressing gasoline and vehicles together as a “system” further improves the cost-effectiveness of reducing emissions. According to your agency, when the standards are fully implemented by 2025, the standards will likely add less than \$150/vehicle and 1 cent/gallon to gasoline costs. However, the benefits greatly outweigh the costs. By 2030, the annual health benefits would be between \$8 and \$23 billion (double to 7 times the costs).

It would be “pennywise, tons foolish” to save a cent on gasoline, only to have to pay even more with our health as a result of additional tons of pollution. To put the cost in perspective, over the last four years, gasoline prices fluctuated over \$2.25 DOLLARS/gallon, with weekly increases of ten cents happening with regularity.

EPA estimates the cost of cleaner gasoline will be about one cent per gallon. By comparison, failing to maintain proper tire pressure can waste the equivalent of 11 cents per gallon. By speeding or aggressive driving, a driver of a typical vehicle could bleed 20-40 cents per gallon. A roof rack? 60 cents/gallon. Meanwhile, fuel economy standards are poised to save consumers the equivalent of \$1.30/gallon by 2025. The proposed clean car standards provide a great service at an outstanding value.

In summary, this common sense rule is good for our health and good for car owners. We urge you to finalize the rule so it can apply to 2017 models and be in sync with fuel economy standards.

Thank you.