The critique -- including criticism from the Safe Climate Campaign's Daniel Becker, a high-profile defender of EPA's vehicle rules and fuel economy requirements -- comes in response to a Pruitt op-ed in USA Today that defends his recent decision to reopen EPA's vehicle GHG standards for model years 2022-2025.

...It is not clear if the post is a prelude to more analysis, but Becker is already circulating a line-by-line rebuttal of the analysis and Pruitt's citation of it. The post is “little more than a rambling collection of ideological platitudes” with “a number of simple, factual errors.”

Becker argues that the post lacks “any logical arguments for why the footprint-based [GHG and fuel economy] standards would in fact lead to jobs going to Mexico.” He also claims the author has “absolutely zero credentials” related to the auto industry, regulatory policy or trade policy.

...“[F]irst person I know of to criticize [fuel economy]/GHG averaging!” Becker notes, adding that the post also appears to have an erroneous statement that the Ford Focus “lowers the overall [miles per gallon] across the Ford fleet.”

More broadly, Becker targets Pruitt's reliance on the NCPA blog post. Administration officials are “relying on [an] unreliable source, [and are] failing to check [their] facts.”

And he said the op-end offers “no account of the [rule's] benefits,” echoing criticism in recent days that Pruitt's discussion of the cumulative program costs omits projected fuel savings and other benefits that are more than triple the cost figures.

He adds that Pruitt’s article ignores the auto sector’s “record sales and profits” over the past two years.

Additionally, Becker highlights a general Pruitt statement that improved technology from 1970-2015 has made the United States the world leader in clean air quality. “Improved technology AND THE REGULATIONS THAT REQUIRED THEM has made the United States the world leader in clean air quality,” he writes.
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The op-ed raises concerns the rules would cost the industry $200 billion -- a figure InsideEPA/climate previously reported corresponds to EPA's cumulative cost estimates for the entire MY12-25 light-duty vehicle GHG regulatory program, but not the MY22-25 rules that the Trump team is reviewing.

Pruitt's article came just prior to an analysis by the International Council on Clean Transportation saying that even the Obama EPA greatly overestimated compliance costs for its vehicle GHG program.

But environmentalists are now taking particular aim at Pruitt's use of an analysis floated by the National Center For Policy Analysis (NCPA) -- an anti-regulation group backed by the Charles Koch Charitable Foundation and ExxonMobil -- suggesting that the vehicle GHG rules export jobs.

“The [NCPA] analysis says these standards have pushed manufacturing and jobs to Mexico,” Pruitt said in the op-ed, citing the conclusion as a central reason for EPA and the Transportation Department to revisit their GHG and fuel economy standards, in line with the Trump administration's goal of boosting U.S. manufacturing.

The NCPA analysis is actually a relatively cursory, nine-paragraph blog entry on the group's website. The post leads off by describing auto manufacturer Ford as “taking heat” for deciding to build all small cars in Mexico.

“Given that Ford sales have risen strongly since the recession, what is the reason for this change in direction?” the analysis asks rhetorically, calling labor costs “the easy answer.”

But the NCPA post says it is also “likely” that the vehicle regulations have “helped them to shift jobs south.” It makes a general argument that fuel economy standards impose costs, and that small cars are less profitable, but it does not include analysis linking EPA's rules with specific domestic job losses. It also omits reference to the global push for greater vehicle fuel efficiency in major markets such as China and Europe.

'Ideological Platitudes'

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And he references NCPA's funding from oil interests, citing several specific errors or odd statements in the blog post, including an apparent criticism of “complex” provisions in the rules -- supported by the auto industry -- that allow automakers to comply with efficiency requirements using “average fuel economy across its respective fleet.”
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