AEM
Association of Equipment Manufacturers

Headquarters
6737 W. Washington Street, Suite 2400
Milwaukee, WI 53214-5650
T: 414.272.0943

aem.org
aem@aem.org
Toll free: 866.236.0442

New Mexico Environmental Improvement Board (EIB)
1190 St. Francis Drive, Suite N4050
Santa Fe, NM 87505

February, 16 2026

Subject: Comment on the Proposed Rule to Implement the EIB 25-61 (R) - Per- and Poly-Fluoroalkyl Substances Act (HB212)
To: Environmental Improvement Board (EIB)

The Association of Equipment Manufacturers (AEM) appreciates the opportunity to comment on the New Mexico Environment Department's (NMED) proposed rule; *Prohibitions on products containing per- or polyfluoroalkyl substances; currently unavoidable use; reporting; labeling; testing; fees and penalties*,[1] hereafter referred to as the Proposed Rule. We look forward to sharing the expertise and technical knowledge of our industry sectors. We believe it is critically important when developing regulations that the interests of all stakeholders be considered and understood.

AEM is the North American-based international trade group representing non-road equipment manufacturers and suppliers with more than 1,000 member companies and over 200 product lines in the construction, agriculture, mining, forestry, and utility industries. The equipment manufacturing industry in the United States supports 2.8 million jobs and contributes roughly $288 billion to the economy every year. Our industries remain a critical part of the U.S. economy and represent 12 percent of all manufacturing jobs in the United States. Our members develop and produce a multitude of technologies in a wide range of products, components, and systems that ensure non-road equipment remains safe and efficient, while at the same time reducing carbon emissions and environmental hazards. Finished products have a life cycle measured in decades and are designed for professional recycling of the entire product at the end of life. Additionally, our industry sectors strive to develop climate friendly propulsion systems and support robust environmental stewardship programs around the world.

The non-road equipment manufacturing industry understands the value and importance of using sound science to inform future policymaking decisions. AEM strives to be a key stakeholder in these policymaking discussions. To ensure that new rules meet their objectives, AEM urges NMED to consider taking the following actions regarding their Proposed Rule:

A. Harmonize the labelling rules with the legislative intent of the statute.
B. Adopting terminology that is globally consistent with established industry frameworks.
C. Clarify the exemption of replacement parts and components of exempted whole goods.
D. Move swiftly to clarify the waiver process and publish detailed instructions, templates, and system specifications as soon as possible.
E. Provide waivers to low-risk applications from the labeling requirements.
F. Extend the compliance timelines for the labelling requirements.
G. allow industry associations to submit labeling-waiver requests on behalf of a product class for industry.
H. Revise the PFAS-information requirements for the OMM.

[1] https://www.env.nm.gov/wp-content/uploads/2025/10/2025-10-06-PFAS-Protection-Act-Proposed-Rules.pdf

I. Changing the 30-day update schedule with an annual reporting requirement.

1. <u>Labelling Requirements on Exempted Products:</u>

The New Mexico Legislature explicitly exempted numerous categories of products from the provisions of the PFAS Protection Act, including the sales prohibitions, reporting requirements, disclosure obligations, and currently unavoidable use determinations. As outlined in Section 74-15-3(A) of the Act, these exemptions were deliberately crafted to recognize that many complex durable goods, such as nonroad equipment and other specialized products, use PFAS in limited, often de minimis quantities essential for safety, durability, and performance. Because the Legislature determined that these categories should not be subject to the Act's core regulatory requirements, the imposition of labeling or reporting obligations on these exempt products exceeds the authority granted under the statute and contradicts the Legislature's clear intent.

Despite the Legislature's decision to exempt numerous product categories from the PFAS Protection Act's operative provisions, the New Mexico Environment Department incorporated these same exempt categories into its proposed PFAS labeling requirements. Under the draft rule, NMED requires exempt products, including nonroad equipment, to comply with extensive labeling obligations, including component-level PFAS disclosures and detailed location information, even though these products are not subject to the Act's reporting, sales prohibition, or CUU determination provisions. NMED further requires exempt manufacturers to pursue a labeling waiver that demands identification of intentionally added PFAS by chemical name and CASRN, as well as any additional information the Department deems necessary—effectively creating a de facto reporting requirement for products the Legislature expressly shielded from such obligations. This approach contradicts Section 74-15-5(K) of the Act, which prohibits applying these information requirements to exempt categories, and constitutes an overreach beyond the authority granted under the PFAS Protection Act.

NMED's proposed rule establishes a waiver process through which manufacturers of products exempt under Section 20.13.2.10 may request relief from the labeling requirements. To obtain a waiver, a manufacturer must demonstrate that none of the product's materials containing intentionally added PFAS will come into direct contact with a consumer during the intended use and useful life of the product. The waiver request must include:

(1) specified product information referenced in Section 20.13.2.12(B)(4);

(2) a description of the product;

(3) identification of all intentionally added PFAS by chemical name and CAS Registry Number (or other identifier if no CASRN exists);

(4) an explanation justifying why the product should not require a label; and

(5) any additional information the Department deems necessary to evaluate the request.

Although intended as an exemption pathway, the waiver process effectively requires manufacturers of exempt products to submit detailed chemical disclosures, information the Legislature explicitly determined such products should not be required to provide, because exempt categories are otherwise excluded from these information requirements under Section 74-15-5(K) of the PFAS Protection Act. Furthermore, the waiver process also includes excessive fees ($2,000 per product or $5,000 per product class) and requires resubmission every three years, forcing manufacturers to repeatedly pay to avoid labeling requirements they were never intended to meet.

These provisions not only exceed the Department's statutory authority but also create unreasonable administrative burdens, undermine legislative intent, and risk imposing operational and economic impacts without offering meaningful consumer benefits.

Finally, the PFAS labeling requirement proposed by NMED effectively operates as a backdoor sales prohibition by conditioning a product's ability to be sold or distributed in New Mexico on compliance with a burdensome labeling regime. Under Section 20.13.2.13(A) of the proposed rule, any product that fails to meet the extensive labeling specifications, many of which apply to categories the Legislature expressly exempted from the PFAS Protection Act, may not be sold or offered for sale in the state. This structure allows NMED to impose de facto product bans on exempt goods, despite the clear legislative intent in Section 74-15-3(A) and 74-15-5(K) that such products not be subject to labeling, reporting, or operational restrictions. By tying market access to compliance with labeling requirements that exceed statutory authority and are technically impracticable for complex durable goods, the rule creates an indirect but powerful enforcement mechanism that bars the sale of products the Legislature determined should remain lawful, revealing the labeling mandate as a disguised sales prohibition rather than a consumer-information tool.

Recommendation:

AEM supports revisiting the proposed PFAS labeling requirements to ensure they align with the clear intent of the New Mexico Legislature, which deliberately exempted numerous product categories from the PFAS Protection Act's operative provisions. By bringing the labeling rule back into harmony with these statutory exemptions, the state can uphold legislative direction while avoiding unnecessary burdens on manufacturers and preventing the imposition of de facto reporting or sales restrictions on products the Legislature expressly intended to exclude.

Additionally, AEM fully supports and endorses the comments submitted by the Truck and Engine Manufacturers Association (EMA), which has already submitted comments to the New Mexico Environment Department.

2. **Clearer definitions on Non-Road Equipment:**

Section 20.13.2.10(H) of the proposed rules references motor vehicles, off-highway vehicles, and specialty motor vehicles such as all-terrain vehicles, side-by-side vehicles, and farm equipment. Because industry, regulators, and manufacturers worldwide commonly use NRMM as an umbrella category for machines and vehicles that operate off public roads, aligning NMED's terminology with this internationally recognized classification would support clearer interpretation, facilitate compliance across diverse product sectors, and reduce ambiguities for manufacturers engaging in multi-jurisdictional PFAS reporting and labeling programs.

Recommendation:

AEM respectfully request that NMED consider adopting terminology that is globally consistent with established industry frameworks, specifically the term Nonroad Mobile Machinery (NRMM), to improve clarity and harmonization.

3. **Clarity on components and replacement parts:**

AEM requests that NMED clarify whether components and replacement parts intended for use in non-road equipment qualify for exemptions under Section 20.13.2.10 are themselves exempt from

reporting, CUU determinations, and testing requirements. As written, the proposed rule and supporting materials describe exemptions for certain products, including motor vehicles, off-highway vehicles, and specialty vehicles such as ATVs and farm equipment, but do not explicitly address whether replacement parts or subcomponents used in these exempt products are also included within the exemption scope. Based on the current language, it appears that a whole good product may qualify for exemption, while its associated parts may not, creating a situation where a product is exempt but its necessary replacement parts are not.

Recommendation:

AEM recommends that NMED explicitly reference components and spare parts under exemption H of section 20.13.2.10, to avoid unintended regulatory gaps and to ensure practical implementation for industries that rely on long service lifecycles and consistent availability of replacement components.

4. **PFAS Label Waiver Process:**

Although New Mexico's PFAS Protection Act proposed rule establishes that manufacturers may request a labeling waiver, NMED provided limited detail on the actual submission process, leaving stakeholders without clear instructions on required documentation, evaluation criteria, or electronic submission procedures. While revised rule materials note that complete label waiver requests received by October 31, 2026, will be considered approved, pending review and that NMED will issue final determinations by June 1, 2027, the proposed rule does not explain *how* to prepare or submit such requests, aside from stating that NMED intends to implement the rule electronically and is still developing that functionality. As a result, despite the rule's detailed fee structure and timelines, manufacturers currently face uncertainty because the state has not yet published the application platform, procedural steps, or technical specifications necessary for submitting a labeling waiver under the proposed program.

For manufacturers of complex articles, such as machinery, vehicles, or multi-component equipment, the lack of clarity around the labeling-waiver submission process is especially concerning because these sectors may need to request hundreds or even thousands of product-component labeling waivers to comply with the proposed rule. The rule materials indicate that waiver requests must be individually submitted and reviewed, with complete applications received by October of 2026 considered approved pending NMED's review and final determination by June of 2027. However, the process for intake and response will rely on an electronic system that NMED has stated is still under development, and no templates or procedural specifications have been published to guide high-volume submissions. Given the sheer number of distinct components used in many industrial or durable-goods product lines, manufacturers could be forced to submit waiver requests at a scale far beyond what the agency may be prepared to process within the proposed timelines. This raises a meaningful risk that administrative bottlenecks could delay determinations, impede product availability, and complicate compliance planning for both industry and the department.

Recommendations

AEM urges NMED to move swiftly to clarify the waiver process and publish detailed instructions, templates, and system specifications as soon as possible.

5. **Labelling Challenges for Industry**

Aside from the scope and intent of the PFAS Protection Act, AEM has additional concerns regarding the feasibility and timing of attempting to comply with the labelling rules as written. In case the labelling rules come into effect as written, we feel it is important to highlight how difficult a task it would be for industry to comply with the rule's requirements in the timelines given.

Under Section 20.13.2.13.D, the proposed rule requires that manufacturers of complex goods with intentionally added per- and polyfluoroalkyl substances (PFAS) disclose this information to their customers and end users, stating:

> *Labeling of complex durable goods with intentionally added per- or poly-fluoroalkyl substances. Prior to sale of a complex durable good that contains intentionally added per- or poly-fluoroalkyl substances or components that contain intentionally added per- or poly-fluoroalkyl substances, the manufacturer shall conform to 17 the information requirements of this section.*

Furthermore, in Section 20.13.2.13.D(4):

> *The operation and maintenance manual associated with the complex durable good shall 33 include a statement indicating the presence of intentionally added per- or poly-fluoroalkyl substances and/or 34 component parts with intentionally added per- or poly-fluoroalkyl substances, using words and symbols approved by 35 the department, followed by a complete list of components with intentionally added per- and poly-fluoroalkyl 36 substances, including sufficient detail about the components' locations within the complex durable good such that 37 they can be readily located*

AEM is concerned that the proposed rule does not account for the limited availability of data from the global supply chain regarding the presence of PFAS in parts and components. Manufacturers of complex durable goods, such as agricultural, construction, and industrial equipment, source hundreds of thousands of components from a wide network of suppliers, many of whom do not currently track or disclose PFAS content at the material level. For the non-road equipment industry, PFAS may be present in certain parts and component systems for essential functions such as sealing, insulation, or fire suppression. Requiring manufacturers to label entire systems based on the presence of PFAS in subcomponents oversimplifies product composition, potentially misleading consumers about actual exposure risks, imposes significant logistical and cost burdens on manufacturers, especially when PFAS use is limited to internal, non-accessible parts, and creates confusion in the marketplace, particularly for equipment sold through dealers where labeling visibility and accuracy are difficult to manage.

The data collection educational issues, endemic throughout the supply chain, are compounded by the compliance environment many of these suppliers operate in. Smaller manufacturers of components often do not store chemicals above the reporting thresholds required under the EPA's Central Data Reporting (CDR) Rule or their Toxic Release Inventory (TRI) Sara 313 reporting rules. As a result, many companies in our supply chain never cultivated the systems or expertise needed to gather and store the relevant chemical data for the components and parts they manufacture and distribute. Their task is made more difficult due to the confidential business information (CBI) protections many bulk chemical manufacturers utilize to conceal the composition of their products, making downstream reporting almost impossible to achieve. Additionally, International suppliers follow various global regulations which differ from U.S. mandated chemical reporting requirements, deepening the enforcement and educational issues throughout our supply chains. Absent a data reporting system adopted globally across our industry sectors that can track

and monitor chemical substances throughout the supply chain, it will remain an extraordinarily difficult, if not impossible, task for a single OEM to know the chemical composition of the articles currently sold into New Mexico.

The experience of related industry sectors in their efforts to obtain full material disclosures on their component parts provide a useful example of the challenges of overcoming these widespread educational issues. Adjacent industries, such as the automotive sector, maintain exclusive access to a substance monitoring system, called the International Material Data System (IMDS). The IMDS is used to monitor the chemical composition of goods sold through the automotive supply chain, but due to legal separation and confidentiality laws, does not extend to other industries, such as the non-road equipment industry. This system took a tremendous amount of time, money, and effort to fully implement, but after 20 years of use the system still only covers 80% of the chemicals found in the finished product. The implementation process demonstrates the practical limitations of reaching complete material disclosures for complex durable goods and provides a preview of the struggles all complex article manufacturers will encounter as they work to implement their own systems. For instance, the IMDS system allows a small portion, up to 10% of non-Global Automotive Declarable Substance List (GADSL) chemicals, to remain hidden as industry trade secrets. This creates large data gaps for unregulated substances, such as PFAS chemicals. Additionally, these types of systems rely on *de minimis* thresholds and the use of CAS numbers for reporting purposes. Given the absence of any *de minimis* thresholds in the proposed rule, as well as the large number of PFAS chemicals in use without a recognized CAS number, any system adopted by industry would lack the ability to meet the requirements of the proposed rule.

With this in mind, the lack of supply chain transparency presents significant challenges to non-road OEMs. Identifying PFAS-containing components is often not feasible without performing extremely expensive and unreliable testing for a vast number of parts and components or supplier declarations, which are not reliable, nor do they provide high quality data. Small and mid-sized suppliers may lack the resources or technical capacity to provide detailed chemical inventories, especially for legacy parts or proprietary formulations they are purchasing from further up the supply chain. Leading to obstacles for the nonroad equipment industry due to incomplete or inconsistent data, leading to uncertainty, delays, and potential noncompliance despite good-faith efforts.

Recommendations:

AEM opposes the labeling requirement for complex durable goods containing intentionally added PFAS, as outlined in the proposed rule, on the basis that many such components pose minimal or no exposure risk to customers and end users. In industrial, agricultural, and construction equipment, PFAS are often used in sealed systems, internal gaskets, coatings, or electrical insulation—applications where the chemical is not accessible during normal use or maintenance. Mandating consumer-facing labels for these products overstates the potential risk, creating unnecessary alarm and confusion among users, fails to distinguish between high-exposure consumer products and low-exposure industrial components, undermining the credibility of the labeling system, and imposes disproportionate compliance burdens on manufacturers without delivering meaningful public health benefits.

We urge NMED to adopt a risk-based labeling approach that considers actual exposure potential, product function, and accessibility of PFAS-containing components. Provide waivers to low-risk applications from the onerous labeling requirements which better align with scientific principles and regulatory best practices, while still supporting transparency and environmental goals.

6. **<u>Unrealistic Timelines for Compliance</u>**

The proposed compliance deadline of January 1, 2027, is unrealistic given the complexity of identifying, evaluating, and replacing PFAS-containing components in durable goods and industrial systems. Manufacturers face significant challenges in obtaining accurate data from global supply chains, many of which do not currently track PFAS content at the material level.

The first step in complying with this labeling requirement is identifying the substances of concern in our industry's products. The primary issue is the sheer number of PFAS substances identified through various stakeholder group research. Even with one universal agreed upon definition of PFAS, having a single list that still requires industry to identify and account for over 14,000 unique chemical substances is an extremely challenging task. Requiring companies to account for long lists of chemicals of concern, without corresponding *de minimis* relief provisions, takes time, effort, and resources to accomplish.

While not solely unique to the non-road equipment industry, the issue of supply chain education and communication presents a substantial challenge to global OEMs. Historically, the non-road industry had very little expertise and history regarding the collection and storage of data for chemical management regulations. This educational issue, endemic throughout the supply chain, is compounded by the wider compliance environment many of these companies operate in.

Smaller manufacturers of components often do not store chemicals above the reporting thresholds required under US law (e.g. CDR, SARA 313 reporting rules. As a result, many companies in our supply chains never cultivated the systems or expertise needed to gather and store the relevant chemical data for the components and parts they manufacture and distribute. Their task is made more difficult due to the CBI protections many bulk chemical manufacturers utilize to conceal the composition of their products, making downstream reporting extremely challenging to accomplish. Additionally, International suppliers follow various global regulations which differ from each other, deepening the data collection obstacles faced by the global supply chain. Absent a data reporting system adopted globally across our industry sector that can track and monitor chemical substances throughout the supply chain, it remains an extraordinarily difficult task for a single OEM to know the chemical composition of the articles they currently market.

Table 1: Estimated Timeline for the Non-Road Mobile Machine Industry to Collect PFAS Chemical Data from their Supply Chains

ACTIVITY	TIME
IDENTIFY ALL SUBSTANCES CLASSIFIED AS PFAS FROM REG. LIST	1 months
IDENTIFY HIGH RISK COMPONENT TYPES	6 months
CREATE LIST OF AT-RISK PARTS AND SUBCOMPONENTS	6 months
UPDATE INTERNAL DATA COLLECTION AND COMPLIANCE SYSTEMS	9 months
SUPPLIER COMMUNICATION AND TRAINING	3 months
REQUEST DATA FROM SUPPLIERS	12 months
FORMAT DATA, CHECK ACCURACY & STORE DATA	1 months
TOTAL	38 months

From the timeline listed in Table 1, obtaining data from 80% of the supply chain would take a minimum of 38 months to complete. This assumption relies on upstream suppliers providing high quality chemical information to downstream manufacturers. It also relies on the supply chain having a limited number of chemicals they are required to report. The scale and complexity of the global supply chain will challenge this estimated timeline. Response rates will differ based on

supply chain knowledge gaps, unfamiliarity with chemical regulations, the absence of pre-established systems for collecting material data, as well as the issues associated with CBI protected chemical products. The contrasting formats and methods used to distribute chemical data throughout industry further complicate this project. Some industries, like the automotive industry, use an established system (IMDS) to collect material disclosures for their parts and components. This system uses known CAS numbers, established *de minimis* reporting thresholds, and other criteria to assist in tracking chemical substances in articles. The non-road industry does not possess a system like this, nor do they utilize a common format to collect the required information. Full material disclosures collected on the common formats are received on average 25% faster than "non-standardized" or company specific formats. The uncoordinated and inexperienced nature of the global supply chain creates immense compliance obstacles for OEMs, which will challenge a manufacturer's ability to meet these estimated timelines.

Recommendation

We request that NMED extend compliance timelines for their labelling requirements and allow for technology readiness assessments to ensure that alternatives are available and effective before enforcement begins.

7. **Labelling Waiver Applications on an Industry-level**

Under the revised proposed rule, label waiver requests may be submitted and, if completed by October 31, 2026, considered approved pending review, with NMED issuing final determinations by June 1, 2027. However, the rule assumes that waivers are submitted by individual manufacturers, which may lead to the same product class being evaluated repeatedly for nearly identical technical justifications. Under section 20.13.2.13(F)(4), NMED does mention a label waiver for a product class but based on the section this only applies for individual manufacturers, as opposed to an industry wide waiver request. While product class waiver requests made by an individual manufacturer may make sense for certain products that are unique to an individual manufacturer, in reality, most non-road mobile machines are built to globally harmonized standards and closely mirror each other in their function and use cases. Allowing for only exemptions on an individual manufacturer basis, as opposed to a broader sector type waiver, will result in tens of thousands of unique requests all looking to ask for waivers on the same type of internal gasket or seal. This method will favor larger manufacturers at the expense of smaller manufacturers and raise the costs of doing business in New Mexico, while forcing much higher administrative costs on New Mexico as they work to process the requests.

Recommendation:

Allowing an industry-level submissions would reduce administrative burden both for NMED and for industry, create consistency in determinations for similar products, and harmonize the waiver process with the CUU request structure, which already allows broader, category-level evaluations under the statute. This approach would maintain consumer-protection goals while streamlining regulatory workload and improving clarity across product sectors.

AEM requests that NMED allow industry associations to submit labeling-waiver requests on behalf of a product class for industry.

8. **Operator Maintenance Manual Request**

The proposed indicates that PFAS-containing components must be listed in “sufficient detail” to allow them to be “readily located,” a requirement that creates substantial implementation challenges for manufacturers of complex machinery containing hundreds or thousands of internal components. In practice, operators are not exposed to most PFAS containing parts during the equipment’s standard operational lifecycle. Maintenance professionals, who work with internal components, are trained, follow service protocols, and use proper PPE under OSHA-regulated conditions. Because operator exposure risk is minimal and because mapping all internal PFAS elements in a complex system is disproportionately burdensome, we recommend that the operator maintenance manual (OMM) disclosure requirement be limited to components with which an operator may interact or be exposed during routine use, rather than requiring a comprehensive inventory of all internal PFAS-containing parts.

Recommendation:

AEM requests that NMED revise the PFAS-information requirements for the OMM to limit disclosure obligations to those components with which equipment operators may reasonably come into contact during normal use.

9. **30-Day Reporting Requirement:**

Under the New Mexico PFAS Protection Act proposed rule, manufacturers must report detailed information on intentionally added PFAS in their products beginning in 2027, and reporting obligations apply to any product or component not otherwise banned or exempted. Although the proposed rule materials confirm that manufacturers must maintain up-to-date PFAS information, industry stakeholders have noted that the rule requires submission of an updated report within 30 days of any significant change to PFAS content, an especially challenging timeline for manufacturers with large, global, or highly customized supply chains. Each update also triggers a $1,000 reporting-update fee, creating compounding financial pressure for companies that experience frequent supplier-driven formulation revisions. Because the proposed rule establishes extensive reporting duties without a streamlined mechanism for frequent updates, the 30-day update requirement poses substantial compliance challenges. For manufacturers of specialized or low-volume equipment, where each product may be unique and involve intricate component sourcing, the combination of rapid update deadlines and recurring $1,000 fees will inevitably force companies to evaluate whether continued participation in the New Mexico market is economically viable. Some may conclude that the regulatory and financial burdens outweigh the sales potential in the state, potentially reducing product availability for New Mexico customers.

Recommendation

AEM recommends revising the rule’s requirement that updates to PFAS content be submitted within 30 days of a significant change, as this timeline presents significant feasibility challenges for complex durable goods manufacturers. To promote regulatory transparency while minimizing unnecessary strain on manufacturers, we recommend aligning the update schedule with an annual reporting requirement, which would better reflect industry practices, ease compliance costs, and align more closely with PFAS programs adopted in other states.

Summary of Requests:

The non-road equipment manufacturing industry recognizes the importance of uncovering the presence and usage related to PFAS chemicals. Additionally, non-road equipment manufacturers understand the value in collaborating with policymakers to communicate the needs of industry

during crucial rulemaking decisions. To ensure new rules meet their objectives with accurate and complete data, AEM requests that MCPA:

AEM respectfully requests that NMED reconsider the proposed rule and revise it to:

A. Harmonize the labelling rules with the legislative intent of the statute.
B. Adopting terminology that is globally consistent with established industry frameworks.
C. Clarify the exemption of replacement parts and components of exempted whole goods.
D. Move swiftly to clarify the waiver process and publish detailed instructions, templates, and system specifications as soon as possible.
E. Provide waivers to low-risk applications from the labeling requirements.
F. Extend the compliance timelines for the labelling requirements.
G. allow industry associations to submit labeling-waiver requests on behalf of a product class for industry.
H. Revise the PFAS-information requirements for the OMM.
I. Changing the 30-day update schedule with an annual reporting requirement.

We appreciate the opportunity to provide input and look forward to continued engagement with NMED and the Environmental Improvement Board.

Please feel free to contact me at Jmalcore@aem.org if you have any questions or require any further information.

Best Regards,

Jason Malcore
Senior Director – Safety & Product Leadership
Association of Equipment Manufacturers (AEM)