

September 18th, 2025

To:

John O'Leary, President and CEO, Daimler Truck North America
Karin Rådström, President and CEO, Daimler Truck
Christian Levin, President and CEO, Traton
Mathias Carlbaum, President and CEO, International Motors Inc
Preston Feight, CEO, PACCAR Inc.
Peter Voorhoeve, President and CEO, Volvo Group North America
Martin Lundstedt, President and CEO, Volvo Group
Oliver Blume, CEO, Volkswagen Group

Re: Stand by the Clean Truck Partnership and honor your global electrification commitments

To the CTP Lawsuit Plaintiffs and their Parent Companies

We are reaching out to express our concern regarding the lawsuit filed by your companies or subsidiaries – Daimler Truck North America, Volvo Group North America, International (formerly Navistar and a subsidiary of Traton) and PACCAR – over the Clean Truck Partnership (CTP), a deal to which your companies are signatories. We call on you to uphold the agreement you made, and drop the lawsuit against California and align your activities in a major market with your global commitments to decarbonize your trucks.

The CTP, established in 2023, is a voluntary agreement between the State of California and US truck manufacturers – including Daimler Truck North America, Volvo Group North America, Navistar (now International) and PACCAR. The purpose of the CTP is to advance a cleaner transportation future regardless of any policy shifts. [The agreement states](#), “The OEMs commit to meet, in California, the relevant provisions of the CARB regulations... irrespective of the outcome of any litigation challenging the waivers or authorizations for those regulations *or of CARB’s overall authority to implement those regulations.*” By signing the CTP, the Truck & Engine Manufacturers Association (EMA) and individual members committed to complying with California’s truck emission rules, even if the state lost the federal authority to enforce them. In return, signatories secured tangible benefits, including agreed-upon implementation flexibilities, long-term regulatory and market certainty, and new program designs that manufacturers themselves selected as a condition of the agreement.

On August 4, we delivered [a letter](#) calling on all CTP signatories to stop undermining the deal. Instead, on August 11, Daimler Truck North America, Volvo Group North America, International and PACCAR [filed a lawsuit](#) against the state of California in an attempt to invalidate the CTP. The next day, the Federal Trade Commission ([FTC](#)) [announced its decision](#) to close an anti-trust investigation, an investigation which notably had not been publicized until this very announcement. This decision was allegedly in response to [letters from Daimler Truck, International Motors, PACCAR, and Volvo Group to the FTC](#), stating that the CTP was “rendered

unenforceable.” These letters were dated Sunday, August 10, the day before the FTC’s announcement to drop the investigation. Then on August 15, four days after the lawsuit was filed, the Department of Justice (DOJ) [joined the lawsuit against California over the CTP](#). The concurrent timing of these actions raises questions about whether your companies are being swayed by political forces to undermine your own previously established electrification commitments.

In the legal filing, the four plaintiffs claim to be “caught in the crossfire” between the state of California and the United States, yet these companies have played an active role in undermining the very lifesaving emissions standards to which they committed. For example, the California Air Resources Board [released an analysis](#) showing how US truck manufacturers were shifting responsibility for implementing the Advanced Clean Trucks (ACT) rule onto dealers and fleets by mandating purchases of electric trucks and restricting the sale of diesel trucks. In the state of Oregon, Daimler Truck North America even [suspended the sale of diesel trucks](#), which riled up dealers into opposing the rules. Additionally, some truck manufacturers and their industry associations have also been active in [lobbying against these rules](#) and [EPA regulations](#). Instead of investing in solutions to meet regulations that protect air quality, health, and the environment, these manufacturers have devoted time and resources to actions that delay the transition to a zero-emissions future.

As CTP signatories, Daimler Truck North America, Volvo Group North America, International and PACCAR should be reaffirming their commitments to both the Clean Truck Partnership and their own zero-emissions truck ambitions. In stark contrast, the five other OEM CTP signatories, Cummins, Hino, Stellantis, General Motors and Isuzu, are not party to the lawsuit, and when a similar agreement between California and light-duty vehicle (LDV) OEMs was challenged by the federal government, Stellantis [reaffirmed its commitment](#).

Additionally, weakening regulations risks triggering a domino effect across global markets, as setbacks in a major market impact your competitiveness in the global transition to electrification. Relatedly, we are concerned to see truck manufacturers also challenging supply targets and openly questioning the penalty levels for non-compliance in the European Union. [The European Automobile Manufacturers' Association \(ACEA\) – of which Volvo Group and Daimler Trucks are members – sent a letter](#) to European Commission President Ursula von der Leyen to conduct immediate talks and early reconsideration of Europe’s truck emissions reduction targets. Questioning supply targets undermines efforts to shift to zero-emission vehicles, such as charging infrastructure development. This instability causes greater market uncertainty and jeopardizes your market share at a time when legacy manufacturers are at serious risk of falling behind Chinese electric truck manufacturers.

Accelerating the transition is not only vital to your companies’ long-term success, but also to the success of your US customers who have already adopted [over 52,000 electric trucks](#). By acting now, you avoid locking fleets into outdated technology that [will cost businesses and consumers](#) in the long run – or losing loyal customers altogether.

Beyond the economic benefits, this transition will also secure health benefits for communities around the world for generations to come. As you are aware, diesel trucks represent only 3% of vehicles on the road but cause [86% of NOx](#) and [30% of GHG emissions](#). Diesel pollution carries toxins that cause cancer, respiratory illness, and heart problems, and are [linked to severe health impacts and death](#). Indeed, [a recent study from the Centre for Research on Energy and Clean Air \(CREA\) linked](#) the diesel pollution produced by 10 years of truck sales from Daimler Truck, Traton, Volvo Group and Paccar to 307,000 deaths worldwide and more than USD 1.4 trillion in global health costs by 2040. Standing by your electrification commitments is the best pathway to avert this economic and human toll.

We call on you to take the necessary steps to ensure that Daimler Truck North America, Volvo Group North America, International and PACCAR drop the lawsuit against California. Additionally, we urge you to support regulations that provide market certainty and foster electric truck adoption across regions, including the US and Europe.

We call on you to honor your commitment – not just to the CTP but to the truck drivers, fleets and communities who stand to greatly benefit from electrification – and demonstrably increase your efforts to electrify the medium and heavy duty trucking sector. The future of the global trucking sector is in your hands.

Sincerely,

Acterra EV Charging for All Coalition

ActionAid Denmark

Alliance of Nurses for Healthy Environments

California Interfaith Power & Light

Climate Action California

California Environmental Voters

Climate Solutions

Climate Stewards

Communication for Change

Confidence Consult.

Data Desk

Ekō

Electric Vehicle Association

Environmental Action Germany

Evergreen Action

Global North and South Movement

Green Transition Denmark

GreenLatinos

League of Conservation Voters (LCV)

Native Sun Community Power Development

Natural Resources Defense Council (NRDC)

Neighbors for Clean Air

NorCal Elders Climate Action

Opportunity Green

Oregon Business for Climate

Outcast activism forum Uganda

New Mobility Association (PSNM)

Public Citizen

Rede de Trabalho Amazonico - GTA

Sierra Club

SoCal Elders Climate Action

Transport & Environment (T&E)

The Greenlining Institute

The Sunrise Project

YES-Europe