

Ms. Shobna Sahni

Ms. Belinda Chen

Ms. Anna Wong

Ms. Natalie Reavey

California Air Resources Board

1001 I Street

Sacramento, CA 95814-282820th November 2025

Subject: Comments on the California Air Resources Board Drive Forward Light-Duty Vehicle Program initiative

Dear Ms. Sahni, Ms. Chen, Ms. Wong, and Ms. Reavey,

Bugatti Rimac d.o.o. ("Bugatti Rimac" or the "Company") is pleased to submit comments to the California Air Resources Board ("CARB" or the "Agency") regarding the Drive Forward Light-Duty Vehicle Program initiative.

Bugatti Rimac appreciates CARB's continued leadership in advancing clean air and climate goals. The Company intent in providing feedback is to emphasize the importance of maintaining continuity in requirements for small volume manufacturers, consistent with previous regulatory frameworks. Preserving this continuity ensures that environmental objectives are met without imposing disproportionate burdens on niche manufacturers.

We also recognize that regulatory harmonization, both within California and across other jurisdictions, is an important factor in achieving environmental benefits efficiently. Harmonized standards reduce complexity, support innovation, and enable manufacturers to allocate resources effectively toward technologies that deliver meaningful emissions reductions.

➤ **Potential alignment to EPA Tier 4 NMOG+NOx fleet average compliance**

The Company appreciate the intent of harmonizing to federal requirements. In analogy with the implementation and phase-in of the federal requirements, Bugatti Rimac would like to underline the importance of keeping continuity on providing flexibilities to SVMs, who need more time in adapting to new significant regulatory requirements.

➤ **Exploring more rigorous test cycles for dyno and Real-World Emission control**

CARB is looking for input on real-driving emission test procedures, referring to European requirements during the workshop held on the 21st of October. Bugatti Rimac would like to highlight that the European Commission provides exemption to SVMs from RDE testing: the European Commission recognised that the burden of testing SVMs vehicles is disproportionate, and the design of peculiar vehicles (e.g. supercars and hypercars) is a

technical limitation for the installation of the equipment (e.g. PEMS). For those reasons, Bugatti Rimac would like to suggest to CARB to consider SVMs exclusion from the scope of real-driving testing.

➤ **Non-Exhaust Emissions**

Bugatti Rimac would like to underline that harmonization with international standards is essential to reduce complexity and regulatory burden. Tire abrasion performances and brake particle emissions requirements and testing procedures are currently being developed at UNECE and harmonization with those standards would ensure consistency and efficiency in achieving environmental goals.

➤ **ZEV Certification**

CARB is looking for inputs on additional allowances for ZEVs. At this stage, it is not clear which kind of limitation or benefits would apply to ZEVs and if CARB intention is to apply ZEV scheme to PHEVs. Bugatti Rimac would like to remark to CARB to take into consideration the peculiarity of high-performance PHEVs (e.g. hyper cars). This type of architecture usually implies several constraints that would make difficult the satisfaction of specific ZEV requirements, especially in terms of minimum charging capability, minimum range, or similar.

Bugatti Rimac appreciates the opportunity to provide comments and feedback to CARB Drive Forward Light-Duty Vehicle Program initiative. Thank you for your consideration of these comments.

Should you have any questions, please contact us at certification@bugatti-rimac.com.

Sincerely,

Alessandro Campochiaro

Head of Vehicle Type Approval & Regulatory Affairs

Bugatti-Rimac d.o.o.



Digitally signed by
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