



NATIONAL VEHICLE AND FUEL EMISSIONS LABORATORY

ANN ARBOR, MI 48105

August 17, 2026

IACD-2026-12 (LDV/LDT/ICI/LIMO)

SUBJECT: Changes to Engine Oil Specifications

Dear Manufacturer,

The purpose of this letter is to clarify the certification and in-use requirements related to temporary or permanent changes to engine oil specifications. The U.S. Environmental Protection Agency (EPA) has received questions from manufacturers asking what actions, if any, a manufacturer must take if the manufacturer changes the engine lubricating oil specification from the oil described in a certification application or in subsequent service information provided to owners of previously certified vehicles.

CERTIFICATION REQUIREMENTS

Manufacturers should notify the EPA of their intent to change the recommended engine oil for current model year vehicles. Manufacturers should attest, based on data and good engineering judgement, that the vehicles will continue to comply with all regulatory requirements, including, but not limited to: the exhaust and evaporative emissions standards, durability requirements, and on-board diagnostics (OBD) requirements. Manufacturers may use the running change process for making such attestations to the EPA.

If the change is only to the factory fill or a temporary allowance for dealers or individuals to use oil other than the recommended engine oil in the owner's manual in response to circumstances beyond the manufacturer's control, no additional Fuel Economy (FE) testing is required.

If the change is a permanent change to the recommended engine oil for service, all future FE and emissions testing should be conducted with the newly recommended oil. The EPA notes that a change to the recommended engine oil would not require retesting of previously conducted FE tests per the requirements of 40 CFR 600.507.

IN-USE AND WARRANTY REQUIREMENTS

Manufacturers may submit field fix notifications to notify the EPA of their intent to change the recommended service engine oil for vehicles that have already entered commerce. Manufacturers should attest, based on data and good engineering judgement, that the vehicles will continue to comply with all regulatory requirements, including, but not limited to: the exhaust and evaporative emissions standards, durability requirements, and OBD requirements.

Manufacturers may not deny Federal emission-related warranty claims based on the use of either the original recommended oil specification or the new recommended oil specification.

If you have any questions, please contact your certification team representative.

Sincerely,

A handwritten signature in black ink, appearing to read "Byron J. Bunker", written over a light gray rectangular background.

Byron J. Bunker, Director
Implementation, Analysis and Compliance Division
Office of Transportation and Air Quality