



## 2021 STATE LEGISLATIVE PRIORITIES

### Building Decarbonization

- Encourage market-based approaches to decarbonization, where such initiatives are under consideration, and oppose electric-only policies.
- Promote policies that prioritize the following factors: consumer choice, consumer costs, and consumer comfort and safety.
- Promote the responsible development and use of all energy sources and encourage energy efficiency measures aimed at meeting future energy demands.
- Ensure that state proposals to modify buildings or restrict energy sources do not impose on the ability of AHRI members to do business in that state. Specifically, federal preemption is not violated, and products are not forced out of the market due to energy source.
- Support energy/fuel choice legislation that prohibits local jurisdictions from banning access to a specific utility.

### Chemicals and Refrigerants Policy

- Oppose regulatory and legislative efforts to ban the use of chlorocarbons as a refrigerant feedstock or where trace amounts of the chlorocarbon remain in a refrigerant after it is consumed or transformed in a closed system.
- Monitor policies that limit refrigerant choice.
- Monitor policies impacting refrigerant chlorocarbon emissions in manufacturing.
- Monitor hazardous waste definitions to ensure recovered refrigerant and reclaim are excluded.

### Codes and Standards

- Encourage state and local jurisdictions to adopt, implement, and advance national consensus building energy codes that permit flexibility at the local level, while at the same time do not conflict with federal energy conservation standards.
- Encourage state and local jurisdictions to adopt and implement building codes that include updated references to federally mandated performance metrics.
- Support policies that harmonize with ASHRAE Standard 90.1
- Support enabling the use of next generation refrigerants through safety standards adoption into codes for all applications. Educate state elected officials and regulatory agencies on the need for next generation refrigerants.

### Corrugated Stainless Steel Tubing Safety Campaign

- Support state level efforts to ensure that homeowners and home inspectors are made aware of the need to have properly grounded equipment when connecting gas sources to appliances.

### Cybersecurity and Data Privacy

- Encourage consistent state data privacy policies and practices that ensure the proper handling of data through inclusion of industry best practices, self-regulation, and market-based solutions.

- Oppose cybersecurity policies that do not include clear compliance pathways and those that expose manufacturers to undue liability.
- Support state cybersecurity policies that encourage innovation among manufacturers and rely on voluntary, industry-led best practices aimed at ensuring products are secure and safe from the threat of hacking or malfeasance.

### Demand Response

- Support demand response programs and policies that encourage innovation and preserve the ability of manufacturers and consumers to utilize the best available technology.
- Support harmonization of demand response programs and policies with existing regulations and requirements at both the state and federal level, including the ENERGY STAR program, in order to avoid differing requirements based on jurisdiction.
- Support inclusion of *AHRI Standard 1380 – Demand Response through Variable Capacity HVAC Systems in Residential and Small Commercial Applications* and *AHRI Standard 1430 – Demand Response for Electric and Heat Pump Water Heaters* (being developed) when states or utilities implement demand response programs and policies that target residential and/or small commercial HVAC or water heating systems, as applicable.
- Oppose proposals that would create programs where burdens are unfairly placed onto manufacturers relative to other stakeholders.

### Energy Efficiency Program Funding

- Support state funding for utility-run energy efficiency programs.
- Work with state legislators, regulatory bodies, and the utility industry to support programs that would incentivize consumers to replace older, less efficient HVACR and water heating equipment with newer, more efficient equipment.
- Support legislative and regulatory actions seeking to provide financial incentives for the purchase and/or installation of energy efficient product and equipment.

### Energy Standards/Programs

- Ensure that efficiency standards and building codes for HVACR and water heating equipment are uniform throughout the United States and do not conflict with federal requirements and do not violate the Energy Policy and Conservation Act's preemption provision.
- Encourage state and local jurisdictions to update legislative and regulatory language that accurately reflects current energy efficiency standards and performance metrics being used to measure product efficiency.

### Hydrofluorocarbon Phase Down Legislation and Rulemakings

- Support the adoption and harmonization of state level prohibitions on HFCs in all end uses in EPA SNAP Rules 20 and 21.
- Support harmonization of state disclosure and reporting requirements. Maintain flexible disclosure options and limit to self-reporting and recordkeeping for audit only.
- Support the allowance of reclaim in existing equipment and promote state actions to incentivize the use of reclaim.
- Support enabling the use of next generation refrigerants through safety standards adoption into codes for all applications. Educate state elected officials and regulatory agencies on the need for next generation refrigerants.

## Indoor Air Quality

- Monitor state proposals that mandate indoor air quality requirements.
- Support harmonization for minimum indoor air quality requirements with ASHRAE Standard 62.1 and ASHRAE 170 where applicable.
- Support incentives for adoption of best available technologies for improving indoor air quality.

## COVID-19 Policy

- Support implementation of COVID-19 related liability protections for essential businesses.
- Encourage states to follow the federal (DHS/CISA) guidance that designates the HVACR and WH industry, including the full supply chain, as essential when considering additional COVID-19 related executive actions.
- Support funding opportunities for ventilation and HVACR upgrades for buildings, including schools and government buildings, in response to COVID-19

## Permitting Compliance

- Support statewide online permitting systems that streamline the permit application process and reduce barriers to permitting compliance.
- Oppose serial number tracking or digital tracking as a method of attempting to increase permitting compliance.

## Plastics and Single-Use Packaging

- Support policies that expand recycling infrastructure and programs that encourage viable and sustainable reuse and recycling.
- Oppose proposals that place the burden of reducing or eliminating plastics and single-use packaging only on manufacturers.
- Oppose efforts to ban single-use packaging that is used to store or transport manufacturers' products (i.e. non-consumer-oriented, transport or tertiary packaging). Support proposals that include exemptions for non-consumer-oriented, transport or tertiary packaging.
- Oppose proposals that require 100% recyclable content in non-consumer-oriented packaging, as some single-use plastics and packaging materials are necessary for the protection of products and recycling options are limited.
- Encourage policies that include reasonable source reduction requirements that differentiate between point-of-purchase and non-consumer-oriented packaging.
- Educate policymakers about the need for balance between source reduction and the importance of preventing damage to products.

## Right to Repair

- Work with legislators to ensure right to repair legislation is limited in scope and does not include HVACR and/or water heating products in the definition of eligible equipment.

## Warranty

- Oppose state policies that interfere with manufacturers' warranty processes and programs and/or their relationships with contractors.
- Oppose state policies that limit a consumer's ability to choose the warranty coverage that meets their personal and financial needs.

- Educate policymakers about the importance of manufacturer warranty registration requirements and oppose state policies that interfere or eliminate the warranty registration process.

## Workforce

- Support state policies that encourage schools to offer a diverse array of career and technical education (CTE) programs, including industry-recognized certification programs.
- Support state and local policies aimed at developing and expanding a skilled workforce through Science, Technology, Engineering, and Mathematics (STEM) retention programs for students who indicate an interest in a STEM career field.
- Work with industry partners at the state level to promote quality installation and maintenance of HVACR and water heating equipment. Ensure that repairs and maintenance are being completed by qualified, licensed contractors.