



TESTIMONY OF
THE AIR-CONDITIONING, HEATING, AND REFRIGERATION INSTITUTE

BEFORE THE MAINE STATE LEGISLATURE
JOINT COMMITTEE ON ENVIRONMENT AND NATURAL RESOURCES

HEARING ON HB 1505

MARCH 4, 2020

Chair Carson, Chair Tucker and members of the Joint Committee on Environment and Natural Resources, thank you for allowing the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) to submit written testimony with respect to House Paper 1505 (HP 1505) and its intent to reduce greenhouse gas emissions from hydrofluorocarbons (HFCs).

AHRI represents more than 300 manufacturers of air conditioning, heating, and commercial refrigeration equipment. It is an internationally recognized advocate for the HVACR industry and certifies the performance of many of the products manufactured by its members. In North America, the annual economic activity resulting from the HVACR industry is approximately \$256 billion. In the United States alone, AHRI members companies, along with distributors, contractors, and technicians employ more than 1.3 million people.

AHRI has been actively engaged with rulemakings and legislation at the international, federal, and state levels supporting the reduction of HFC emissions from stationary air conditioning and refrigeration systems. While industry would prefer to see a federal initiative address low global warming potential refrigerants, AHRI will continue to provide technical expertise and practical solutions to states that have announced an intent to regulate HFC emissions.

It is our goal that through providing technical feedback and industry expertise we can help states, including Maine, adopt and implement laws and regulations that achieve the objectives stated in HP 1505 – to transition Maine from HFCs to replacement refrigerants that have lower global warming potential and that pose lower overall risks to human health and the environment.

AHRI generally supports adoption of EPA’s Significant New Alternatives Policy (SNAP) Program Rules 20 and 21, a foundational piece of HP 1505. **However, we respectfully request your consideration of the following industry concerns and suggested amendment language that aims to ensure manufacturers can reasonably comply with the requirements included in HP 1505.**

Disclosure Statements

A variety of disclosure statements have been proposed by states planning to regulate HFCs. These proposals are state-specific, including the Maine-specific disclosure language included in HP 1505 Section 4. An important policy consideration in implementing state regulations is the additional burdens that a state-by-state patchwork of regulations impose on a line of products that are marketed and sold nationally. A practical regulation would align states’ requirements to reduce the compliance burden to manufacturers and added costs to consumers.

With these concerns in mind, **AHRI requests Section 4 be amended to expressly allow for digital disclosures, which are the most cost effective and practical means of communicating important compliance information, and suggests the following disclosure statement language:**

This equipment meets the regulatory requirements for hydrofluorocarbons in all states as of the manufacturing date. Only those refrigerants approved in the state for specific end uses may be used.

Commercial Refrigeration Compliance Deadline

AHRI requests HP 1505 be amended to allow for a one-year delay for the commercial refrigeration products listed in Section 2(I) through Section 2(P), and Section 2(Z) as this equipment is often specified and may even be already under contract through January 2022. **By delaying the compliance deadline for the commercial refrigeration products and equipment listed in these sections until January 1, 2022, the Legislature will ensure manufacturers have sufficient time to prepare for, and comply with, Maine's regulations.**

Addition of Codes and Standards Provision

Finally, **AHRI respectfully requests the bill be amended to include language directing the Maine Department of Public Safety to amend the state building code as necessary to align the requirements for the use of certain equipment or products with the prohibitions and requirements for the use of HFCs or other substitutes in those equipment or products.** Including this language is critical, as the adoption of appropriate safety standards into building codes must be completed to enable the lower global warming potential solutions needed to comply with the legislation. Large commercial chiller systems, in particular, will require the adoption of new consensus safety standards into Maine's building codes to comply with this legislation. The following suggested language would address this concern.

The Department of Public Safety shall adopt rules as necessary to align the state building code to enable the use of substitutes not restricted under section 2 of this 2020 Act and rules adopted by the Department of Environmental Protection pursuant to section 2 of this 2020 Act.

We hope this is the start of an ongoing conversation between the Maine State Legislature and AHRI. We believe that AHRI can provide helpful recommendations during the legislative -- and subsequent regulatory -- process that are technically feasible, allow for market certainty, and benefit consumers and the industries that serve them, while still positively impacting the environment without imposing an undue burden on manufacturers.

Thank you for the opportunity to submit testimony for this hearing. AHRI looks forward to working with Chair Carson, Chair Tucker, and members of the Maine Legislature, so we can be partners in supporting and achieving the phase down of high-global warming potential HFCs.