



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

BEFORE THE HAWAII STATE LEGISLATURE
HOUSE COMMITTEE ON ENERGY AND ENVIRONMENTAL PROTECTION

HEARING ON HB 2492

JANUARY 30, 2020

Chair Lowen and members of the House Committee on Energy and Environmental Protection, thank you for allowing the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) to submit written testimony with respect to House Bill 2492 (HB 2492) and its intents to reduce greenhouse gas emissions from hydrofluorocarbons (HFCs). AHRI supports HB 2492, but respectfully requests that the Committee consider an implementation delay for the products and equipment listed in §342B-B(a)(1).

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. As an association, we have organized our members and facilitated information sharing with all of the 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 Hawaii, adopt and implement laws and regulations that achieve the objectives stated in HB 2492 – to transition Hawaii from HFCs to replacement refrigerants that have lower global warming potential and that pose lower overall risks to human health and the environment.

AHRI supports the legislation and its intent to adopt the Environmental Protection Agency's Significant New Alternatives Policy (SNAP) Program Rules 20 and 21. However, we **respectfully request two minor modifications to §342B-B:**

- 1. Delay the compliance deadline for the products and equipment listed in §342B-B(a)(1) until January 1, 2022, to ensure that our manufacturers have sufficient time to prepare for, and ensure compliance with, Hawaii's regulations.**
- 2. To provide better clarity for manufacturers and distributors, amend the language in §342B-B(a) to read as follows:**

(a) No person shall offer any product or equipment for sale, lease, rent, or installation, or otherwise cause the product or equipment ~~to enter commerce~~ to be installed in the State if that equipment or product consists of, uses, or will use a substitute, consistent with the deadlines established in subsection (b).

Also, of note, **AHRI would like to specifically mention our industry's very strong support for §107, which directs the Hawaii Building Code Council to establish codes and standards to permit the use of substitutes required by the regulations.** Maintaining 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 Hawaii's building codes to comply with this legislation.

We hope this is the start of an ongoing conversation between the Hawaii 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 Lowen and the Hawaii Legislature, so we can be partners in supporting and achieving the phase down of high-global warming potential HFCs.