



The Alliance
for Responsible Atmospheric Policy

Discussion Item 20-13-4: Public Hearing to Consider Proposed Amendments to the Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Chillers, Aerosols-Propellants, and Foam End-Uses Regulation

California Air Resources Board Meeting

December 10, 2020

Madame Chair, members of the Board, my name is Kevin Fay and I am pleased to provide comments concerning the CARB proposed amendments to the prohibitions on use of HFCs in stationary refrigeration, and air conditioners on behalf of the member companies of the Alliance for Responsible Atmospheric Policy.

The Alliance for Responsible Atmospheric Policy, the Alliance, is an industry coalition of fluorocarbon producer and user entities and trade associations of companies that rely on these compounds. The Alliance was organized in 1980 and has been a leading voice in the development and implementation of ozone protection policy at the global level as well as domestic implementation under Title VI of the Clean Air Act. Today, the Alliance coordinates industry participation in the development of economically and environmentally beneficial international and domestic policies at the nexus of ozone protection and climate change. A list of members is attached.

I appear today to give our strong support for the revised proposal for the stationary air conditioning transition dates to achieve transition for certain equipment categories away from high-GWP hydrofluorocarbon (HFC) refrigerants to low GWP compounds and technologies as part of your effort to reduce emissions of HFCs as required by Senate Bill 1383. This proposal, moving the Unitary air conditioning sector transition date to January 1, 2025, and the industry providing 10% replacement of the high GWP new equipment refrigerant installed in the 2023-2024 period, is the most comprehensive and far-reaching policy with regard to the air conditioning sector around the globe. It is both progressive and pragmatic, in that it recognizes the complicated nature of the transition to occur, the importance of having in place adequate building codes and safety standards, as well as the tremendous investment being made by the industry in achieving the regulatory objective.

This proposal creates a partnership with this industry and will require additional work beyond to further the development of policies with respect to refrigerant management and reclaim programs as well as the consideration of other policies encouraging the use of reclaim material in equipment service as an important component of how we achieve our objectives.

We also align ourselves with the technical comments provided by AHRI.



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The air conditioning industry has been an active member of the Alliance since its founding in 1980, organized to first address the concerns with the use of ozone depleting substances, and now successfully addressing the impacts of current refrigerant technologies on the earth's climate. In 2013, Alliance members pledged to "support policies and take actions to achieve an 80% reduction in global HFC emissions by 2050." Coming out of that pledge was the Kigali amendment to the Montreal Protocol which was adopted in 2016 to establish the global basis for achieving a worldwide phasedown of HFC compounds. That amendment was successfully negotiated with the active support and input from our industries.

The modified proposal before you today is consistent with the goals of the Kigali amendment and an important part of our goal to have a unified federal approach in the United States to achieve an HFC phasedown. We believe this CARB proposal will be an important precursor to that end in the coming year at the federal level. As part of our activity, we are also currently supporting federal legislation, known as the AIM Act, that would facilitate a federal program for this purpose.

The transition date you have proposed for the air conditioning sector is a very aggressive standard, and one that will require a continued public-private partnership in order to achieve its proposed objectives. We support its approval because the CARB staff has shown a willingness to understand the complex challenges confronting the industry, and the need to coordinate the implementation activities with a full suite of additional approaches. In fact, similar flexibility may be required for other parts of the refrigeration sector, as has been expressed with regard to ice rinks and other components of the commercial refrigeration sector, and we encourage CARB to provide such flexibility where necessary. We are prepared to work with you in developing the implementation rules and programs to provide for a transition that is environmentally and economically effective, and works for the many industry participants as well as the citizens of California.

Again, the Alliance appreciates the opportunity to provide the comments to this proposed rule. We look forward to working with the state to achieve amenable approaches to the regulation. Thank you and please do not hesitate to contact us if we can elaborate on these comments.

Sincerely,

Kevin Fay
Executive Director
Alliance for Responsible Atmospheric Policy



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