



## HOSHIZAKI AMERICA, INC.

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July 2, 2018

Ms. Pamela Gupta

Clerk of the Board, Air Resources Board

1001 I Street, Sacramento, CA 95814

**Subject: Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration and Foam End- Uses**

Dear Board Members:

Thank you for looking out for our environment by proposing regulations for refrigerant use. However, there are concerns with the enforcement requirements for the ruling.

### **ENFORCEMENT REQUIREMENTS**

The requirements for recordkeeping should be eliminated to limit the burden on manufacturers. Manufacturers have a complex recording system to make sure they account for many factors that include the reporting for EPA, DOE, and IRS. Additional requirements by one state can disrupt this process and create unnecessary burdens on business. Hoshizaki America operates in a supply chain where equipment is shipped around the globe on a daily basis. The equipment is often not shipped to the direct end-user. Distribution centers and contractors play a role in delivering the good to the end user. Included in ARB's initial statement of reason in the staff report, is the assumption that "affected businesses already keep all the records that will be required for the record-keeping provision, thus there is no additional recordkeeping cost". While in fact, many businesses do not keep the statements and records that this regulation will now require. Many of the products that are manufactured do not reach California through the initial sale. These products instead enter into the market and are distributed geographically. As currently outlined, all documentation requirements will also not be known for all equipment as some of these pieces are just components of the full system and will not individually contain all refrigerant and charge information. Placing these unnecessary record keeping requirements on manufacturers does come at a cost and does not improve the enforcement of these regulations.

Hoshizaki America also believes the disclosure statement should be eliminated. The disclosure requirement that CARB has proposed is unnecessarily long. Adding a specific statement for California would increase the cost of every machine to accommodate a statement that is not currently on the machine. If our request to eliminate is denied, we make a second request that the statement should be a short simple disclosure statement such as: "This equipment complies with California Code #####).

Sincerely yours,

Stephen Schaefer