

Mary D. Nichols
Chair
California Environmental Protection Agency
Air Resources Board
1001 "I" Street
Sacramento, CA

RE: Public Comments on the Air Resources Board's Draft Short-Lived Climate Pollutant Reduction Strategy

Dear Ms. Nichols:

The North American Association of Food Equipment Manufacturers (NAFEM) appreciates the opportunity to submit in a response to your draft Short-Lived Climate Pollutant (SLCP) Reduction Strategy.

NAFEM represents more than 550 members that manufacture commercial foodservice equipment and supplies for the food away from home market. These member companies make the tools used to prepare, cook, serve and store food safely, including a variety of refrigeration and cooking products.

NAFEM has a long history of supporting the prevention of climate change and the reduction of energy consumption. Working with federal agencies, like the U.S. Environmental Protection Agency (USEPA) and the U.S. Department of Energy (USDOE), our members strive to make products more energy efficient where technologically and economically feasible in the North American market.

To that end, while we support reducing emissions that contribute to the Global Warming Potential (GWP), we believe that any transition to other refrigerants or types of charbroilers could have severe, negative effects on the industry, the consumer, and the environment, if established without consideration of a broad set of factors.

It is important to understand that any transition to alternative refrigeration will take a significant amount of time. Among the many factors to consider are technological and safety implications, the creation of a diverse product line that leads to a lengthy design cycle, and the potentially adverse effects some alternative refrigerants can have on energy efficiency and energy consumption. There are also important food safety issues that are essential in the development of commercial refrigeration products. If not taken seriously, these factors could have many unintended negative consequences, including loss of jobs and innovative products. Foodservice operators need to serve consumer demands.

Additionally, as it relates to black carbon emissions, many NAFEM members make charbroilers for use in commercial cooking. Per CARB's draft, many standards are already in place, that help reduce emissions from these machines. As with any transition, any change to regulations would take a significant amount of time. NAFEM and its member companies are eager to work with CARB to research and study feasible alternatives that will benefit both the consumer and the environment.

We believe the consideration of the above mentioned factors will contribute to a balanced, achievable, and environmentally sound path forward. NAFEM welcomes a constructive dialogue on these issues as the Board moves forward.

Respectfully Submitted,

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