

09-1-2
Aaron Lowe

**Testimony before the
California Air Resources Board
Regarding Agenda Item 09-1-2
Proposed Regulation for Small Containers of Automotive Refrigerant**

**Presented by:
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The Automotive Aftermarket Industry Association (AAIA) is a national trade group representing manufacturers, distributors and retailers of automotive parts and accessories. Many of our members are involved in the packaging and selling of R-134a in small containers.

I want to register AAIA's support for CARB staff's decision not to ban the retail sale of the small cans of refrigerant containing 134a. Such a ban not only would have had a severe adverse impact on our members, but would have been particularly burdensome on California citizens living on fixed or low income who cannot afford professional service.

The alternative program that would be implemented as a result of this proposal was jointly developed by the industry and the board and includes: a can recycling requirement, use of a self sealing can, and the establishment of a consumer education program. I want to emphasize that implementation of this program will not be easy for our industry and will require many changes to the cans used by consumers, as well as the infrastructure employed by our industry to distribute the products to California retail locations.

In particular, AAIA's members are concerned that the 90% can return rate established in the proposal will be very challenging for the packagers and retailers to meet. Although we are committed to doing everything within our powers to achieve this goal, AAIA hopes that the staff will continue to monitor implementation and will be open to discussing changes to the program that might become necessary based on our member's "real world" experience in operating the recycling program.

Notwithstanding the challenges that lay ahead, the Board's adoption of this regulation will mean that the citizens of the state will still have access to affordable options for servicing their air conditioner, but at the same time minimize emissions of greenhouse gases. Clearly a win-win for everyone involved.

AAIA strongly believes that the proposal and the process that led up to this hearing is an example of how industry and government can work cooperatively to develop solutions to difficult environmental problems. I want to particularly commend the staff for all of their hard work on this project. I'm sure that they will attest to the fact that this process was

not always easy, but that by listening to each other's concerns, and by adopting a positive attitude, we were able to bridge any disagreements and continue to move forward.

I want to assure the board that our members are committed to making this program work and we look forward to continuing to work closely with staff to ensure a smooth and effective rollout.

In closing, I strongly urge the board to approve this proposal during this meeting.

Thank you for the opportunity to testify on this rulemaking and I am available to respond to any questions you might have.