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March 3, 2020

Senator Lisa Murkowski
Chairman
Committee on Energy & Natural Resources
304 Dirksen Senate Building
Washington, DC 20510

Senator Joe Manchin
Ranking Member
Committee on Energy & Natural Resources
304 Dirksen Senate Building
Washington, DC 20510

Dear Chairman Murkowski and Ranking Member Manchin,

AHAM would like to provide the views of home appliance manufacturers on S. 2754, the "American Innovation and Manufacturing Leadership Act of 2020," regarding hydrofluorocarbons (HFCs). S. 2754 is being considered as an amendment to the energy bill (S. 2657). AHAM member companies manufacture products that use refrigerants, such as residential refrigerators, freezers, room/window air conditioners, portable air conditioners and dehumidifiers. All of these products are impacted by S. 2754.

We support the basic intent of S. 2754, which is to recreate a federal regulatory structure for HFCs to avoid a patchwork of state actions in this area. However, we have serious and significant concerns with the Senate version of the bill because it can be read to provide EPA authority on expensive recovery of insulating foam for residential refrigerators/freezers (Section 9) for no significant environmental benefit. EPA never had this authority and this would be new, additional authority for a federal agency, which we do not believe is needed or warranted. The House version of the bill (HR 5544) appropriately addresses this matter by stating that the management and disposal provisions of the bill do not apply to regulated substances contained in foam. Should S. 2754 be included in the larger energy bill, we ask your support to address this matter.

We also have additional recommendations to improve the current version of the bill and look forward to working with the Senate on these issues. Thank you for considering of our views.

Sincerely,

Kevin Messner
Senior Vice President, Policy & Government Relations