



The Alliance
for Responsible Atmospheric Policy

STATEMENT OF

THE ALLIANCE FOR RESPONSIBLE ATMOSPHERIC POLICY

Kevin Fay, Executive Director

November 12, 2014

EPA Clean Air Act Sec. 608 Stakeholder Meeting

Good Morning. My name is Kevin Fay and I am honored to speak here today as executive director of the Alliance for Responsible Atmospheric Policy, a US industry coalition organized in 1980 to address the issue of stratospheric ozone depletion. The Alliance is composed of manufacturers, businesses and trade associations, which make or use fluorinated gases in their course of business. Today, Alliance member companies are leading the development of next generation, climate- and ozone-friendly, technologies and applications. According to a recent study, the US fluorocarbon using and producing industries contribute more than \$158 billion annually in goods and services to the US economy, and provide employment to more than 700,000 individuals with an industry-wide payroll of more than \$32 billion. The Alliance represents more than 100 companies across several sectors engaged in the development of economically and environmentally beneficial international and domestic policies regarding fluorinated gases. The Alliance is proud of its extensive history of working in a constructive manner with EPA on the protection of stratospheric ozone and the mitigation of climate change.

The Montreal Protocol has achieved impressive success in ozone and climate protection due to a combination of internationally-negotiated CFC and HCFC production and consumption phasedown mechanisms paired with domestic implementation measures to control emissions. With HFCs receiving significant consideration under the UNFCCC and potentially under the Protocol as well as expanding domestic measures under current authorities, it is critical to have a comprehensive approach to address their potential climate change contribution, including HFCs already in use in the installed equipment base.

We know that the majority of refrigerant emissions occur during the service, maintenance, repair and disposal of air-conditioning and commercial refrigeration units. Moreover, that equipment operates most

efficiently when properly charged and maintained, minimizing energy consumption and related greenhouse gas emissions.

As industry we are moving forward with measures to promote the responsible use of refrigerants. At the September 23 UN Climate Summit, the Alliance, in conjunction with the Air-Conditioning, Heating and Refrigeration Institute and ABRAVA, the Brazilian Association for HVAC-R, launched the Global Refrigerant Management Initiative to reduce leaks and service emissions throughout the industry's global supply chain through better education, training and certification. This initiative has already received the support of industry associations from 9 countries and the EU, representing 4 continents, and is expected to continue expanding in 2015. But we cannot accomplish our goal of responsible refrigerant management alone.

Such voluntary actions are important, but can be bolstered by sound policies. That is why in January, the Alliance submitted a petition to extend the regulations under Section 608 of the Clean Air Act to HFCs and other substitutes for class I and class II ozone-depleting substances. These policies have proven effective in limiting ODS emissions; now it is time to bring consistency to stationary refrigerant management regulations by extending them to HFCs and other substitutes for class I and class II ozone-depleting substances.

The Alliance appreciates the effort required of EPA to initiate new regulatory activities. We understand that this stakeholder meeting is only an initial step in what could be a lengthy process. Fortunately, as we indicated in our petition, in 1998 the Agency already determined that it has the statutory authority to control emissions of HFC refrigerants from refrigeration and stationary air-conditioning applications. We now encourage EPA to move expeditiously to finalize its 1998 proposal to extend Section 608 regulations regarding sales and distribution; evacuation, certification, reclamation and recovery; leak repair; and reporting and recordkeeping requirements to HFCs and other substitutes for class I and class II ozone-depleting substances.

EPA has posed a series of questions for stakeholders to consider as we reflect on the impact such policy changes may have on business operations and the environment. The Alliance feels that considering these issues is important for the long-term implementation of the policy extension at hand and Alliance members have been encouraged to answer them from a company perspective. However, we urge the Agency to move as soon as possible on the parts of the proposal that it can finalize quickly and not wait until all details of implementation are settled. Once a final rule is issued, the Alliance offers itself as a

partner in working to resolve any remaining details to ensure a comprehensive expanded refrigerant management policy that will be ultimately successful.

In reducing the contribution of HFCs to climate change, initiating proper refrigerant management practices remains the lowest hanging fruit. The Alliance appreciates the opportunity to address EPA and other stakeholders today on this important element of HFC policy and looks forward to cooperatively supporting the design and implementation of a Section 608 extension. We know from the ODS experience that this is possible; let us move quickly to repeat that success with HFCs and other substitutes for class I and class II ozone depleting substances.