



March 12, 2020

The Honorable John Kennedy
United States Senate
Washington, D.C. 20510

The Honorable Tom Carper
United States Senate
Washington, D.C. 20510

Dear Senators Kennedy and Carper:

On behalf of the members of the Alliance for Responsible Atmospheric Policy and the Air-Conditioning, Heating, and Refrigeration Institute (AHRI), we are writing in support of S. 2754, the American Innovation and Manufacturing Act (AIM Act). The AIM Act has strong bipartisan support in the Senate. It provides a rational approach to achieve the gradual phasedown of hydrofluorocarbon (HFC) compounds over a 15-year period. This legislation works in a fashion similar to provisions of Title VI of the Clean Air Act, which was successfully used to transition from ozone-depleting substances over the past 30 years.

Producers and end-users of HFCs both support this legislation because what industry desires most is a rational, national program for achieving the transition to new effective and beneficial technologies in an economically sustainable manner. Our industries pledged in 2014 to support policies and take steps to achieve a global emission reduction of high global warming potential (GWP) HFCs by 2050. Since that time, the industry has succeeded in supporting a global policy process now endorsed by nearly 100 countries. Here in the United States, these industries have invested billions of dollars to develop new technologies that will allow us to remain global technology leaders. The provisions in S. 2754 are consistent with provisions used for the past three decades, with some additional flexibility built in, carefully balancing the interests of users, producers, consumers, policymakers, and environment groups.

We recognize that a great deal of interest has been expressed in preempting states from enacting stricter policies than those of the federal government. Our view and experience have been that the most effective preemption is having a credible national program in place. In the early 1990s, when Title VI was first enacted, more than 20 states had adopted some type of regulatory measure focused on ozone depleting substances. Within a few years of federal action, all of those programs were gone, and Title VI has been a great success for that 30-year period. We believe an effective national program on HFCs will produce similar results over the next 15 years and beyond.

Industry is desirous of a uniform federal approach, states and environment groups are desirous of knowing that the national program is credible and effective. We believe that S. 2754 will produce such a program as drafted and urge you to support its passage.

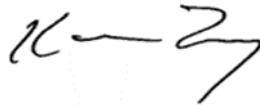
As you know, a University of Maryland analysis found that this program will generate 33,000 U.S. manufacturing jobs, increase our overall share of the global export market, and improve our balance of trade annually by \$12.5 billion. Further, it is our understanding that the U.S. Environmental Protection Agency's own cost analysis, which has not yet been released, suggests that this program will actually result in billions of dollars in consumer savings over its 15-year implementation period.

It is imperative that we support this carefully balanced policy to capture the economic and environmental benefits it presents. Every day we delay reduces our chances of achieving the outlined benefits, as the global market transitions, and the U.S. market remains unsure of its path forward. We look forward to working with you on this important legislative policy initiative.

Sincerely,



Stephen R. Yurek
President & CEO
AHRI



Kevin Fay
Executive Director
Alliance for Responsible
Atmospheric Policy