



The Alliance
for Responsible Atmospheric Policy

**STATEMENT OF
THE ALLIANCE FOR RESPONSIBLE ATMOSPHERIC POLICY**

Kevin Fay, Alliance Executive Director

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Good morning. My name is Kevin Fay. I am the executive director of the Alliance for Responsible Atmospheric Policy (Alliance) and it is an honor to present the views of our organization on the SNAP program as we reflect on a year of active rulemaking in this area.

The Alliance is an industry coalition organized in 1980 to address the issue of stratospheric ozone depletion. It is the leading voice of manufacturers, businesses and trade associations who make or use fluorinated gases for the global market. Today, Alliance member companies are leading the development of safe, efficient, 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 to continue its long history of working in a positive manner with EPA on the protection of stratospheric ozone and the mitigation of climate change.

The Alliance appreciates the flexibility demonstrated by EPA in its adjustments to the final provisions of the last change of listing status rule, particularly a number of the status change effective dates. Those changes were an appropriate response to the concerns expressed by some companies regarding technology development in some sectors.

We also welcome news that the agency is preparing to issue a proposed response to the Alliance's January 2014 petition to extend the provisions of Section 608 of the Clean Air Act to HFCs. Promoting effective refrigerant management practices, including recovery, reclamation and reuse, is an important immediate element of reducing the greenhouse gas footprint associated with the use of HFCs and will allow production to be focused primarily for use in new equipment.

The Alliance believes that the most effective means of reducing the future climate change contribution of HFCs should be global in nature. It also must do so in a manner that is orderly, and in a flexible fashion which allows companies to continue to fulfill consumers' need for products and technologies which are vital to public health, food safety, energy conservation, comfort and productivity. The Montreal Protocol has met both of these standards when

successfully addressing CFCs and HCFCs. We believe an amendment to address HFCs would do so as well.

The Alliance recognizes, however, that there is uncertainty over whether the Montreal Protocol will be amended to phase-down HFCs and, as a result, sub-global jurisdictions have begun to address HFCs in order to reduce emissions of high-GWP HFCs. The Alliance also recognizes that the concurrent development of sub-global HFC policies can impact amendment discussions in the Montreal Protocol and encourages sub-global jurisdictions to consider policies which can advance the Montreal Protocol amendment process.

The Alliance is generally supportive of SNAP listing. The listing of new alternatives places new products on the market and empowers user industries and consumers to determine which products best meet their needs. The SNAP program works most effectively when used as a means of complementing the market.

In order for EPA to build further understanding with industry on the need for additional change of listing status rules, the Alliance encourages EPA to:

- Explain how EPA is now better coordinating its rulemaking schedule with DOE
- Clarify the details of EPA's SNAP risk assessment matrix
- Include an explicit statement in future change of listing status rules of the net climate benefit expected (to include energy efficiency impacts)
- Preface rulemakings with a technology review process to include industry input
- Explain how EPA is coordinating its rulemaking schedule with the code- and standard-setting process
- Clarify how SNAP rulemaking is consistent with EPA's support for a global phase-down approach to HFCs

Any additional EPA actions to control HFCs should be carefully pursued and incorporate the important considerations we have cited above. The Alliance believes that those actions should be consistent with proposed global controls as well as other existing and proposed sub-global controls. EPA should also consider revising its approach to HFCs if an amendment to the Protocol is adopted.

In the meantime, the Alliance remains available to assist EPA staff in consideration of any potential rulemakings. The Alliance appreciates the opportunity to provide input on EPA's future use of SNAP and looks forward to working with the agency in a constructive manner to achieve and implement an environmentally beneficial, safety enhancing, and economically viable policy towards HFCs.