

**From:** Pierce, Sarah  
**Sent:** Friday, April 12, 2019 3:25 PM  
**To:** 'asheldon@leg.state.vt.us' <[asheldon@leg.state.vt.us](mailto:asheldon@leg.state.vt.us)>  
**Subject:** Inquiry on Amending VT SB 30 - HFC legislation  
**Importance:** High

Dear Chairwoman Sheldon:

Good afternoon, my name is Sarah Faye Pierce. I am the director of government relations for the home appliance manufacturing industry. I am looking at a bill, VT SB 30 that has been referred to your committee and wanted to reach out to determine if you would be open to considering 2 very small amendments to the legislation?

Our organization supports Vermont, whether by regulation or legislation, prohibiting uses of HFCs consistent with the transition dates in California and under deliberation in Washington, New York, and others. With minor modifications to VT SB 30, the transitions adopted in California and under consideration elsewhere are based on the 2015 and 2016 US EPA Significant New Alternatives Policy (SNAP) rules concerning the use of high global warming potential (high-GWP) HFCs. Prohibitions on HFCs consistent with California and other states will give industry the certainty it needs as it continues to invest, plan, and act to transition away from high-GWP HFCs. We look forward to working with your committee and the state of Vermont as it considers these measures.

For reference: in March 2018, the California Air Resources Board adopted an agency regulation for new refrigeration equipment that implemented the majority of the HFC prohibitions in SNAP Rules 20 and 21. By 2030, this regulation will help realize 80 percent of California's anticipated emissions reductions under SNAP Rules 20 and 21.<sup>[1]</sup> Subsequently, Governor Brown signed California's Senate Bill 1013, passed by supermajority, which will phase out several other major HFC uses in EPA's SNAP Rules 20 and 21 following similar transition dates but with minor modifications.

I would be glad to speak with you and also to Senator Pearson – the Senate sponsor of the bill to offer minor amendments to the bill so that it is consistent with CA, WA and other states. We look forward to working with you and to supporting this bill.

Sarah

**Sarah Faye Pierce**  
**Director, Government Relations**  
**Association of Home Appliance Manufacturers**  
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<sup>[1]</sup> Public Hearing to Consider the Proposed Regulation for Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration and Foam End-Uses, Staff Report: Initial Statement of Reasons pg. 35, California Air Resources Board, January 30, 2018.

**From:** Pierce, Sarah  
**Sent:** Monday, May 6, 2019 11:15 AM  
**To:** 'asheldon@leg.state.vt.us' <[asheldon@leg.state.vt.us](mailto:asheldon@leg.state.vt.us)>  
**Cc:** 'CPearson@leg.state.vt.us' <[CPearson@leg.state.vt.us](mailto:CPearson@leg.state.vt.us)>; 'lbozarth@leg.state.vt.us' <[lbozarth@leg.state.vt.us](mailto:lbozarth@leg.state.vt.us)>  
**Subject:** SUPPORT w/Amendment VT SB 30 - HFC legislation  
**Importance:** High

Dear Chairwoman Sheldon and Ms. Bozarth:

Good morning, my name is Sarah Faye Pierce, I am the Director of Government Relations for the Association of Home Appliance Manufacturers. I write to you regarding VT SB 30 that is scheduled to be heard before your committee tomorrow afternoon at 1:00pm. AHAM would be pleased to support SB 30 if the Committee would be willing to make a minor modification which would make the bill consistent with both California and Washington state.

Attached please find a coalition letter that was sent to Secretary Moore of Vermont Natural Resources this past April regarding VT SB 30. The letter depicts our coalition's support for phase out of high GWP refrigerant gasses and blowing agents and supports the bill and committees work. However there is one issue that should be made consistent with CA and WA which is to **prohibit the sale, lease, rent or entry into market of any equipment of products leading to the use of any prohibited substance based on the date of manufacture.**

This clause should be added to the bill and AHAM will gladly endorse Senator Pearson's bill. I would be happy to call into the hearing tomorrow to communicate this to the full committee, please let me know if you would like AHAM to do so.

Thank you very much for your consideration.

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**From:** Pierce, Sarah <[SPierce@AHAM.org](mailto:SPierce@AHAM.org)>  
**Sent:** Monday, May 06, 2019 11:51 AM  
**To:** Amy Sheldon <[ASheldon@leg.state.vt.us](mailto:ASheldon@leg.state.vt.us)>  
**Cc:** Christopher Pearson <[CPearson@leg.state.vt.us](mailto:CPearson@leg.state.vt.us)>; Laura Bozarth <[LBozarth@leg.state.vt.us](mailto:LBozarth@leg.state.vt.us)>  
**Subject:** RE: SUPPORT w/Amendment VT SB 30 - HFC legislation

Just to follow up quickly – this is what the language looks like from WA state which is the most recent state to enact the HFC phase out:

(1) A person may not offer any product or equipment for sale, lease, or rent, or install or otherwise cause any equipment or product to enter into commerce in Washington if that equipment or product consists of, uses, or will use a substitute, as set forth in appendix U and V, Subpart G of 40 C.F.R. Part 82, as those read on January 3, 2017, for the applications or end uses restricted by appendix U or V of the federal regulation, as those read on January 3, 2017, consistent with the deadlines established in subsection (2) of this section. Except where existing equipment is retrofit, nothing in this subsection requires a person that acquired a restricted product or equipment prior to the effective date of the restrictions in subsection (2) of this section to cease use of that product or equipment. **Products or equipment manufactured prior to the applicable effective date** of the restrictions specified in subsection (2) of this section may be sold, imported, exported, distributed, installed, and used after the specified effective date.

(2) The restrictions under subsection (1) of this section for the following products and equipment identified in appendix U and V, Subpart G of 40 C.F.R. Part 82, as those read on January 3, 2017, take effect beginning:

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