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**Testimony from Christina Theodoridi, Natural Resources Defense Council, to the Vermont House Committee on Natural Resources, Fish, and Wildlife Regarding H523**

Good morning, Chair Sheldon, Vice-Chair McCullough, and members of the Committee. I am Christina Theodoridi with the Natural Resources Defense Council. NRDC is a national environmental advocacy organization with over three decades of experience working to protect the ozone layer and the climate from harmful refrigerant gases in cooling and heating appliances.

NRDC supports H523, as proposed to be amended by Representative McCormack. The amended version will **effectively authorize the use of climate-friendlier alternatives to hydrofluorocarbons (HFCs) in the state of Vermont**. HFCs are super-potent greenhouse gases used today as refrigerants, but which are being phased down across the world on account of their environmental destructiveness. This transition away from HFCs first started in Vermont with the enactment of Act 65 in 2019. Since then, a new federal law called the AIM Act, will phase down HFC refrigerants across all end-uses by 85% over the next 15 years avoiding 4.6 billion tons of CO<sub>2</sub>e cumulatively through midcentury, which is nearly equal to three years of U.S. power sector emissions at 2019 levels.

Enabling the transition away from HFCs is particularly important for states like Vermont that have ambitions to electrify heating. The amended language will ensure that Vermonters will have access to heat pump models with climate-friendlier refrigerant alternatives, which otherwise may be considerably delayed.

To unlock the transition to new refrigerants, **building codes in all fifty states must be updated so that climate-friendlier substitute refrigerants can be used in chillers, air conditioning and heat pumps, and commercial refrigeration equipment**. The proposed amendment does that here in Vermont by ensuring that the state building code permits use of refrigerants that are approved by US EPA under its Significant New Alternatives Policy program (or SNAP for short). The requested amendment includes a reference to Section 42 of the US code – that's the reference to EPA's SNAP program.

EPA conducts refrigerant evaluations and approvals under the SNAP program based on the same underlying product and building safety standards as the model building codes, including an evaluation of impacts on human health and the environment. H523 once amended, will simply ensure that the state building codes permit these safer alternatives.

**NATURAL RESOURCES DEFENSE COUNCIL**

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**The bill does not in any way limit the broad authority of the Department of Environmental Conservation to issue regulations addressing refrigerants.** Once Vermont updates its building codes to the latest model codes, this language will effectively no longer be needed. But that process may take several years: Vermont currently uses the 2015 version of the model codes when the 2024 version is the first edition that fully enables substitute refrigerants. Because of this timing mismatch several states (e.g., OR, TX, ME, MA, AZ) are adopting the proposed legislative language to bridge that gap.

On behalf of NRDC, I urge you to support the amended version of H523 as a key part of the transition away from climate-polluting HFCs. Thank you for the opportunity to present testimony here today and I welcome your questions.