

February 24, 2022

Hon. Amy Sheldon, Chair
House Committee on Natural Resources, Fish and Wildlife
Vermont State Capitol
115 State Street
Montpelier, VT 05633

RE: House Bill 523 – Hydrofluorocarbons

Dear Chairwoman Sheldon and Members of the Committee:

On behalf of the Alliance for Automotive Innovation (Auto Innovators), I am writing relative to the Committee's consideration of House Bill 523, legislation designed to further regulate the sale of products containing hydrofluorocarbons or HFCs. Formed in 2020, the Alliance for Automotive Innovation is the singular, authoritative, and respected voice of the automotive industry, and represents automakers producing nearly 98 percent of cars and light trucks sold in the U.S., as well as tier-one suppliers and other automotive technology companies.

Automaker Environmental Commitments

Protecting consumers and their employees is a top priority for our members – spanning from protection from exposure to harmful hazardous materials to limiting and minimizing our environmental footprint. More than just a vague principle, this objective has been pursued through concrete actions. Not only are automakers producing more fuel-efficient and safer cars than ever, our members have also made tremendous strides in reducing the amount of substances of concern contained within automobiles. For example, automakers removed lead wheel weights from all automobiles in 2009, have eliminated several PDBE flame retardants, are currently phasing out the use of deca-BDE, and are working with brake pad manufacturers to reformulate brake friction material to utilize compounds with a smaller environmental impact than heavy metals, such as copper. In 2006, after eliminating the use of mercury in convenience lights and antilock brakes, automakers joined with the federal Environmental Protection Agency (EPA), states, environmental groups, and other industry stakeholders—such as steelmakers, auto dismantlers, and recyclers—to create the National Mercury Switch Removal Program. This program was designed to ensure the safe removal and collection of mercury-containing switches in automobiles. More than 7 million mercury switches have been collected to date, preventing approximately 15,000 pounds of mercury from being released into the environment.

Automakers have also been the leaders in manufacturing recyclable consumer products. Automobiles are among the most recycled consumer products in the U.S. Through the recycling process, end-of-life vehicles are used as donor vehicles for the existing vehicle fleet, recycled into new vehicles and new vehicle components, or repurposed into non-automotive applications. Approximately 86% of a vehicle's material content is recycled, reused, or used for energy recovery. Moreover, many auto manufacturing plants have gone landfill-free or zero waste-to-landfill.

HB 523 - Hydrofluorocarbons

With respect to House Bill, 523, automakers have recognized the need to reduce greenhouse gas emissions associated with refrigerants, and have already started to voluntarily transition to refrigerants with lower Global Warming Potential (GWP). In 2013, the Cadillac XTC became the first vehicle sold in the U.S. that utilized a new refrigerant, R-1234yf, which has a GWP of only 4, instead of a rating of 1,430 carried by HFC-134a. Some automakers are also transitioning to an even newer refrigerant, R-744, with a GWP of just 1. Today, over 85% of the light-duty vehicle fleet uses these low GWP refrigerants, providing significant and real GHG emissions benefits. Whether transitioning to R-1234yf, R-744, or a new refrigerant not yet developed, the light-duty vehicle market in the U.S. and around the world is moving away from the refrigerants cited in House Bill 523 – voluntarily.

In the time since House Bill 523 was filed, we have worked with Representative McCormack to discuss the great strides made by the auto industry. It is our understanding that – in recognition of these voluntary efforts – Representative McCormack has suggested that when the Committee considers House Bill 523, it should do so with an eye toward striking the sections that would apply to new cars and trucks, Sec. 1. 10 V.S.A. sec. 586 (b)(4)(G) and (H).

If the Committee should decide to House Bill 523 forward in the legislative process with the above suggested changes, it would be doing so with the support of the Alliance for Automotive Innovation.

In closing, I should also note that we see no concerns with the other sections of the bill that relate to automotive uses of these refrigerants, specifically the banning of over-the-counter recharge containers and the requirement for appropriate equipment be used to extract and reclaim HFCs when older vehicles are in need of repairs. Both are practical steps to help ensure HFCs are not improperly vented into the atmosphere.

Thank you for your consideration of the Auto Innovators' position. Please do not hesitate to contact me, should I be able to provide any additional information.

Sincerely,



Wayne Weikel
Senior Director, State Affairs

cc: Members - House Committee on Natural Resources, Fish, and Wildlife
Representative Curt McCormack