



April 7, 2020

Chairman Barrasso and Ranking Member Carper
Senate Environment and Public Works Committee
Dirksen Senate Office Building
Washington, D.C. 20510

RE: Pending Federal Regulation of HFC: S. 2754, American Innovation and Manufacturing Act of 2019: NMMA Written Testimony

Dear Sirs:

The National Marine Manufacturers Association (NMMA) supports the comments of Structural Composites/Compsys, Inc regarding the pending regulation of HFC 134a. NMMA urges Congress to provide an extension or exemption for Structural Composite Preforming as requested. Many US boat manufacturers which are small businesses depend on the availability of this technology to build boats and more time is needed until a suitable HFC replacement is developed for this process. Without this relief our members will face great hardship at a time when they can least afford it. The marine industry has already successfully eliminated 95% of the HFC used in USCG required vessel floatation foam, we just need more time for BASF or others to reformulate a suitable alternative for structural composite preforms.

The NMMA is the largest recreational marine industry trade association in the United States, representing over 1,500 members, including boat, engine and accessory parts manufacturers. NMMA members collectively produce 80% of all recreational products sold in the U.S. The recreational boating industry contributes over \$121 billion to the economy annually, with 35,000 marine businesses supporting over 650,000 jobs.

If you have any questions, please do not hesitate to contact me at 202-257-3754 or jmcknight@nmma.org

Sincerely,

A handwritten signature in cursive script that reads "John M^c Knight".

John McKnight, Senior Vice President
Environmental & Safety Compliance
National Marine Manufacturers Association
650 Massachusetts Ave Suite 560

Washington DC 20001