



From: 350NYC.org

RE: Letter in Support of the Senate Bill S. 2754, “American Innovation and Manufacturing Act of 2019”

**Contact Name: Margaret Perkins, PhD.,
180 West End Ave, 27F
New York, NY 10023
meperkins@nyc.rr.com
917-796-7613**

We are members of the grassroots climate group 350NYC.org, and we are very pleased to have the opportunity to write to Senator John Barrasso and other members of the Senate Committee on Environment and Public Works in support of S.2754, the AIM Act. The bill is sponsored by Senators John Kennedy and Tom Carper and supported by more than a third of the Senate. It proposes an ambitious phase-down of production and use of hydrofluorocarbons (HFCs), man-made chemicals with high global warming potential.

At the outset, 350NYC.org members would like to state that it is indeed heartening, given these disturbing times of extreme national insecurity, to have an important bi-partisan climate bill come before the Senate. The major goal of the 350NYC.org is to advocate for strong policies that will reduce the greenhouse gas (GHG) emissions of the United States to conform with Paris Climate Accords that the US signed, along with 193 countries, in 2015. S.2754 is an important step towards our national climate commitments.

S.2754 proposes an ambitious but necessary timeline for the phase-down of high global warming potential HFCs, which is smart not only from an environmental perspective, but as an economic driver. The AIM Act will achieve an 80% reduction in emissions from HFCs by 2035. This is consistent with the emissions reductions required under the Kigali Amendment to the United Nations’ Montreal Protocol, which has been ratified by 93 nations since its negotiation in 2016. S.2754 has wide support from industry groups that are anxious to retain their crucial leadership in innovation by transitioning to safe refrigerant alternatives. These groups are demanding market certainty to compete with other countries in global trade. Many countries have already made the significant transition to safer low global warming potential alternatives. It is the role of Congress to provide market certainty, and time is of the essence.

S2754 will make an important contribution to the overall reduction in the U.S. GHG emissions that must be achieved by 2050 to slow climate change and prevent catastrophic disruption to the health and the security of the billions of the planet’s population. The current COVID-19 crisis illustrates that the nation must decisively enact policies based on science, to avert the climate crisis and mitigate future societal disruptions. The potential health consequences of the COVID-19 pandemic were recklessly downplayed by political leaders who chose to dismiss the glaring scientific evidence predicting the gravity of the situation. We urge the Senate committee not to downplay the compelling scientific evidence forecasting the impending climate crisis when they consider S.2754.

S.2754 also includes very robust provisions on Refrigerant Management. This is crucial as it is estimated that 90% of the F-gases in large refrigerant systems and appliances is vented to the atmosphere due to leakage and incorrect methods of disposal at end of product life. The original EPA SNAP regulations on HFC management included detailed rules on servicing, reclamation and disposal of gases, and we strongly urge the senators to retain these important rules in S2754. *Switching to lower global warming potential alternatives will not solve the problem alone. We must regulate stringent guidelines on F-gas containment through mandated management protocols.* Finally, we recommend that S.2754 maintain the precedent set by the Clean Air Act amendments concerning the phase out of ozone depleting gases and give states the rights to regulate their GHG emissions.

Sincerely

Rachel Makleff, rachelmakleff@msm.com

Rachel Goodgal, Rachel.goodgal@gmail.com

Dorian Fulvio dfulvio@gmail.com and

Margaret Perkins meperkins@nyc.rr.com for 350NYC.org Steering Committee