



April 8, 2020

The Honorable John Barrasso
Chairman
Committee on Environment & Public Works
United States Senate
Washington, DC 20510

The Honorable Thomas Carper
Ranking Member
Committee on Environment & Public Works
United States Senate
Washington, DC 20510

Dear Chairman Barrasso and Ranking Member Carper:

I am writing on behalf of the Halon Alternatives Research Corporation (HARC) to provide input to the Committee on its consideration of the *American Innovation and Manufacturing Act of 2019* (AIM Act) (S.2754). HARC is a non-profit trade association formed to promote the development and approval of halon alternatives that serves as an information clearinghouse and focal point for cooperation between government and industry on issues of importance to special hazard fire protection. HARC members encompass all levels of the fire protection industry including agent manufacturers, equipment manufacturers, distributors/installers, recyclers, and end-users.

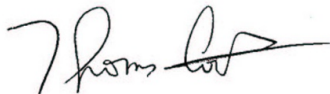
A main focus of HARC's activities since its inception in 1989 has been working with the Environmental Protection Agency (EPA) on implementation within the fire protection industry of the Montreal Protocol on Substances that Deplete the Ozone Layer. HARC believes that it is critical for the United States to continue to be a leader in the Montreal Protocol process and to fully implement all of its provisions, including the Kigali amendment on hydrofluorocarbons (HFCs). The AIM Act provides a federal framework for phasing down HFCs in accordance with the Kigali amendment and enabling a transition to next generation technologies. This is vital to the continued competitiveness of important U.S. industries such as heating, air conditioning, refrigeration and fire protection.

HARC is aware of the various state regulations on HFCs that have appeared in the last few years. Although they do not currently regulate fire protection agents, they provide states with

the authority to do so, potentially resulting in inconsistent policies regarding the use of HFC fire protection agents in the U.S. HARC feels strongly that the environmental regulation of special hazard fire protection agents such as HFCs should be handled at the federal level by EPA because of their extensive experience and technical knowledge as compared to the various state regulators. The AIM Act provides for a clear national policy on the regulation of HFCs and ensures implementation of that policy by EPA.

Although HARC has concerns about the authority provided to EPA in the AIM Act to regulate individual HFC agents in specific applications beyond the phase down, the proliferation of state regulations on HFCs make that somewhat of a moot point. If regulation of individual HFC agents in specific applications is going to occur in the U.S., we would prefer those decisions to be made at the federal level as provided for in the AIM Act.

Respectfully submitted,



Thomas Cortina
Executive Director

cc:

The Honorable James M. Inhofe
The Honorable Shelley Moore Capito
The Honorable Kevin Cramer
The Honorable Mike Braun
The Honorable Mike Rounds
The Honorable Dan Sullivan
The Honorable John Boozman
The Honorable Roger F. Wicker
The Honorable Richard Shelby
The Honorable Joni Ernst

The Honorable Benjamin L. Cardin
The Honorable Bernard Sanders
The Honorable Sheldon Whitehouse
The Honorable Jeff Merkley
The Honorable Kristen Gillibrand
The Honorable Cory A. Booker
The Honorable Edward Markey
The Honorable Tammy Duckworth
The Honorable Chris Van Hollen

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