



**PLUMBING-HEATING-COOLING
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Before the United States Senate Committee on Environment and Public Works

**Written Testimony in Support of S.2754—The American Innovation and Manufacturing
(AIM) Act**

Chuck White, Vice President of Regulatory Affairs

Mark Valentini, Director of Legislative Affairs

On Behalf of the Plumbing Heating Cooling Contractors—National Association (PHCC)

Chairman Barrasso, Ranking Member Carper, and Members of the Committee: Thank you for the opportunity to provide written testimony regarding S.2754, the American Innovation and Manufacturing (AIM) Act. The Plumbing Heating Cooling Contractors – National Association (PHCC)* has been working with other industry stakeholders via coalitions and task forces on the base topic of the AIM Act, the orderly transition to alternate refrigerants for use in commercial and residential applications—for the intents and purposes of PHCC membership, those applications relate specifically to the sale, installation, use, and maintenance of heating, ventilation, air-conditioning and refrigeration products. PHCC approaches this issue with the utmost concern, because our members must consider all aspects of these products to prepare both our workforce and customers for adoption of the next generation of products and technology.

The HVAC industry has successfully navigated refrigerant transitions in the past and has drawn on that experience. Older refrigerants, such as R-22, have been replaced with newer alternatives, such as R-410A. There has been very little disruption to the industry or consumers. Phased out refrigerants that have been reclaimed and recycled and alternate refrigerants are still available meaning older equipment may remain in service. As equipment ages and reaches the end of its economic life, upgrading to newer equipment with updated refrigerant becomes the norm.

The change resulting from the AIM Act will have parallels to the R-22 to R-410A conversion. Advanced technology and refrigerants will require new equipment and will not be compatible with older components of air conditioning or refrigeration equipment. Workforce training will be required to understand the new installation, operation and maintenance conditions.

Safe operation will require additional controls to monitor for leaks, start mitigation systems, and notify competent personnel of issues in the systems. The additional training required will be broader than with R-410A to ensure competent technicians work safely with these new products. PHCC believes in the need for training and certification of technicians and supports stronger enforcement of those certification requirements. We are particularly supportive of ensuring

qualified professionals are handling these substances and those substances are properly disposed of at the end of its life cycle.

The industry has worked hard to lay the groundwork for this transition. Much work has been done to develop codes and standards to implement new products. Maintaining the American lead in manufacturing and delivering the highest level of technology has been the driving force in these efforts. The industry is working to develop and implement comprehensive training for its workforce with a particular focus on safety. PHCC is confident that the HVAC industry will be ready for implementation when the time comes.

Perhaps the greatest challenge is the lack of uniformity across the country. Without Federal direction, some jurisdictions are already moving forward to set requirements and establish timelines that may not be attainable. The AIM Act would solidify this activity, manufacturers could proceed with product design, building designers could plan how to proceed, the distribution chain could implement processes for handling equipment, and installing contractors could develop and train the next generation of HVACR technicians.

PHCC asks that this committee advance the AIM Act for Congressional action and allow the HVAC industry to move forward in its work.

Should you or Committee staff have any questions or concerns, or otherwise need further clarification, you can contact us at government@naphcc.org. Again, we thank the Committee for hearing our testimony.

*The Plumbing Heating Cooling Contractors – National Association (PHCC) has represented plumbing and HVAC contractors for over 137 years. Our 3,400 plus contractor-members have significant interest in many aspects of energy related products and expect to deliver top quality products and services to their consumer clients.