

Representative Karin Power
Chair, House Committee on Energy and Environment
900 Court St. NE
Salem, OR 97301

February 6, 2020

Re: HB 4024 – Support with amendment

Chair Power and members of the committee, thank you for the opportunity to share the viewpoints of the home appliance manufacturing industry regarding HB 4024.

AHAM's membership includes over 150 companies throughout the world. AHAM member companies employ tens of thousands of people and produce more than 95% of the household appliances that are shipped for sale within the United States. The factory shipment value of these products is more than \$38 billion annually. Through its technology, employees and productivity, the industry contributes significantly to the US job market and the nation's economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. The purchase of new appliances often represents the most effective choice a consumer can make to reduce home energy use and costs.

AHAM represents manufacturers of residential refrigerators/freezers and supports a harmonized regulatory framework for reducing hydrofluorocarbon use nationwide. In California, we negotiated SB 1013 with a diverse group of stakeholders to find a compromise that phased out HFCs and allowed the industry sufficient time to make the required changes. Certainty is key for our industry; when HFCs are regulated on a state-by-state basis, we ask that there is consistency throughout these regulations that will allow our manufacturers to comply. Oregon's neighbors to the north and south have already passed similar legislation; we ask that the Oregon version mirror these previously adopted versions.

HB 4024 includes many of our priorities. The bill appropriately includes the same effective dates for restrictions as California and other states for consumer refrigeration products and defines that term as it is in the federal regulations. The bill also provides clarity that the dates are tied to the date of manufacture. **However, I would like to convey AHAM' support for HB 4024 with an important amendment.**

The bill creates duplicative disclosure rules. If the committee decides to include product labeling requirements, we would recommend the below bill language. The law enacted in Washington State (HB112) specifically included a provision that the regulating agency "must consider labels required by state building codes and other safety standards in its rule making." Home refrigerator/freezers are already required to have labels on the products under safety standards



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(UL) and the National Electrical Code (NEC). We do not want to be forced to have another duplicative, costly label on our products. Again, certainty is key for us and the change below maintains the intent but assures the rulemaking process has some certainty for us.

*The commission shall adopt rules requiring manufacturers to disclose the substitutes used in their products or equipment. **The commission shall recognize** any one of the following as providing sufficient disclosure of the use of substitutes in the product or equipment:*

- (a) Labeling of products and equipment;*
- (b) Submitting information to the Department of Environmental Quality;*
- (c) Disclosure of products containing substitutes to the buyer of those products; or*
- (d) **labels and disclosure required by state building codes and other safety standards.***

In summary, AHAM supports efforts to transition from HFCs as we have supported these bills in other states. We want to support a strong bill that provides certainty for our industry. Our recommended changes would maintain the intent of the bill while assuring the rulemaking process more certainty. AHAM appreciates the opportunity to comment on the HB 4024 and would be glad to discuss further these matters.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin Messner", is written over a white background.

Kevin Messner
Sr. VP, Policy & Government Relations