

Margaret: Our first hand raised is Christopher Breese. Mr. Breese, whenever you are ready.

Christopher Breese: Can you hear me okay?

Margaret: Yes.

Christopher: Awesome. Thank you. Hello, my name is Chris Breese. I would like to start off by thanking the Washington Department of Ecology for giving me the opportunity to testify today on behalf of the Air-Conditioning, Heating, and Refrigeration Institute, or AHRI. AHRI represents more than 300 manufacturers of air conditioning, heating, and commercial refrigeration equipment. It is an internationally recognized advocate for the HFC industry and certifies the performance of many of the products manufactured by its members.

We are appreciative of the efforts by the Department of Ecology in passing these regulations, which are complicated by the legislative mandate regarding labeling. AHRI requests that the disclosure and labeling requirements in this rule be modified to allow electronic disclosure or disclosure within product literature, giving the consumers up-to-date, accurate, and clear information on their unit, while preventing an undue and impractical burden on manufacturers to include separate labeling on the unit for every state enacting similar regulations.

AHRI number of manufactured products which are sold through distributors making it uncertain at the time of manufacture, which states the product will be sold in. Due to this, in order to comply with state-level HFC regulations, AHRI number of products using hydrofluorocarbons could potentially require dozens of different labels to comply with each state's labeling requirement as most US [unintelligible 00:04:04] states are considering similar regulations.

For products sold in the market nationally, a state-by-state patchwork of regulations imposes a significant additional burden on manufacturers that they need to comply with each state's requirements. AHRI suggests a disclosure statement as follows be allowed. This equipment meets the regulatory requirements for hydrofluorocarbons in all states as of the manufacturing date. Only those refrigerants approved in the state for specific end-uses may be used.

Thank you all for the opportunity to testify on this issue. I end on this rule, AHRI looks forward to continuing to work with the Washington Department of Ecology on the face-down of the usage of high global warming potential hydrofluorocarbons in the state of Washington. We are happy to discuss this issue further at any time. Please feel free to reach out to us with any questions you may have on our experience working with other states on HFC [unintelligible 00:04:50] rule. Thank you.