

March 3, 2020

The Honorable John Barrasso
Chairman, Senate Environment and Public Works Committee
U.S. Senate
410 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Thomas R. Carper
Ranking Member, Senate Environment and Public Works Committee
U.S. Senate
456 Dirksen Senate Office Building
Washington, DC 20510

Dear Chairman Barrasso and Ranking Member Carper:

The National Marine Manufacturers Association (NMMA) welcomes the opportunity to express our support for the American Innovation and Manufacturing Act of 2019 (S.2754) – including provisions that require gradually phasing down the use of hydrofluorocarbons (HFCs) – and offer suggestions on how to strengthen the legislation.

NMMA is the trade association for the U.S. recreational boating industry, representing nearly 1,300 marine business including recreational, boat, engine and accessory manufacturers, many of which are small businesses. NMMA members manufacture more than 80 percent of the marine products in the U.S.

We appreciate that both the Senate and House bills include a gradual phasedown period over the course of 15 years. To date, the recreational boating industry has completely phased out vessel flotation foams and foam used for sound and vibration reduction that contain HFCs, resulting in an 80 to 90 percent reduction in our industry's HFCs use. For the small portion of the industry that currently uses structural composite foams with HFCs – an essential manufacturing material used to frame the skeleton of a vessel's hull – there is not a viable substitute at this time. While we support phasing down the use of HFCs, it is important to note that structural composite foams greatly reduce the weight of a vessel, which equates to significant reductions in fuel use and emissions.

NMMA members are working diligently with partners to develop HFC-free alternatives to structural composite foams and we are hopeful that suitable replacements will be available in the near future. As we continue to work with industry partners to identify and install a replacement material for boats that require structural foam, we applaud the House and Senate for including a provision that would allow manufacturers to notify the U.S. Environmental Protection Agency if there is no HFC substitute or alternative technology available after the initial phasedown.

Additionally, given the economic and environmental impact of this legislation, the recreational boating industry is concerned that the legislation does not pre-empt states from setting their own HFC restrictions, and thus, leading to conflicting standards. NMMA believes that states should not

be able to set HFC requirements that differ from the federal government as this will continue to cause confusion.

For our industry to continue to grow, we must continue innovating to make the boating experience and manufacturing process more environmentally friendly. Again, NMMA appreciates your consideration of our comments on this legislation and looks forward to working with the committee to address this important environmental issue.

Sincerely,



T. Nicole Vasilaros, Esq.
Senior Vice President, Government and Legal Affairs
National Marine Manufacturers Association