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The Polyisocyanurate Insulation Manufacturers Association (PIMA) generally supports the intent of LD 226 (proposed amendment – Rep. Tucker) to limit the use of hydrofluorocarbons (HFCs) in the economy and particularly within the foam insulation sector. However, we oppose the provisions that would permit the continued use of HFCs and blends thereof in certain foam end uses (Section 3.C and 6.D).

Polyisocyanurate insulation is a foam insulation manufactured using a substance (blowing agent) with low global warming potential (GWP). This technology has been used by manufacturers of polyisocyanurate for more than two decades. Our members manufacture product at more than 36 locations across the United States and Canada. Hunter Panels, a member company, is headquartered in Portland, ME.

Importantly, low GWP substances are now commercially and technologically available for the entire foam insulation sector. This includes extruded polystyrene (XPS) foam insulation boards. Multiple manufacturers now sell XPS insulation products manufactured with low-GWP technology (no HFCs) in both the United States and Canada. Therefore, PIMA is strongly opposed to any provision within LD 226 that would permit manufactures of XPS foam insulation to continue to use HFCs or blends thereof where the GWP value can be as high as 750. Foam insulation products compete as alternatives to one another in the building and construction industry. Therefore, such exemptions under Maine's regulatory framework would create an unfair advantage for a limited number of manufacturers and penalize companies that have made investments to commercialize low-GWP solutions for their products.

In conclusion, Maine's HFC restrictions should establish without any exemptions a uniform prohibition date (January 1, 2022) for HFCs and blends thereof for the entire foam insulation sector (polyisocyanurate, spray foam, extruded polystyrene and expanded polystyrene). We recommend that Sections 3.C and 6.D be deleted in order to level the playing field for manufacturers.

Additional information on PIMA can be found at www.polyiso.org.