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March 12, 2021

Senator Stacey Brenner, Senate Chair
Representative Ralph Tucker, House Chair
Joint Standing Committee on Environment and Natural Resources
100 State House Station
Augusta, ME 04333

**Re: Supporting LD-226 (Proposed Amendment – Rep. Tucker); Opposing
Unnecessary Exemptions for Foam Products**

Dear Chair Brenner and Chair Tucker:

I write today on behalf of Hunter Panels to encourage the Joint Standing Committee on Environment and Natural Resources to continue Maine's strong leadership on protecting the environment through the reduction on hydrofluorocarbons (HFCs) as proposed under LD-226. This legislation proposes an important program to transition industry away from HFCs and towards the use of commercially-available substitutes with significantly lower global warming potentials (GWP). In order to create a level playing field for manufacturers of building insulation, it is critical that LD-226 not create unnecessary exemptions that would allow for the continued use of HFCs in products like extruded polystyrene (XPS) foam board insulation.

Hunter Panels is a leader in the manufacture of polyisocyanurate (or polyiso) insulation – a rigid foam board with exceptional performance that is used to insulate roofs and walls of commercial and residential buildings. Hunter Panels is headquartered in Portland, Maine and operates seven manufacturing facilities across the country. We are proud to call Maine home and are in full support of legislation that protects our environment. Our company is part of an industry that has long been recognized for its environmental stewardship, including eliminating the use of ozone depleting (ODP) and high-GWP substances from its manufacturing process. Today, polyiso insulation is manufactured using non-ODP, low-GWP substances. Additional information on the polyiso industry's use of environmentally-preferred blowing agents is available at: www.polyiso.org/page/HFC.

Energy Smart Polyiso
www.hunterpanels.com



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We support the intent of LD-226 to transition Maine’s economy away from the use of products manufactured or serviced with HFCs. Within the foam insulation sector, it’s important to note that commercially-available, low-GWP substitutes (i.e., GWP <150) are available for all foam insulation products. This fact has been recognized by neighboring states when promulgating their own HFC regulatory frameworks. In particular, Massachusetts, New York and Vermont do not provide for waivers or other exemptions that would permit the continued use of HFCs, or blends thereof, for foam insulation products like XPS insulation. This outcome creates a level playing field for manufacturers in the foam insulation sector and protects the investments made by other manufacturers to transition away from harmful HFC substances.

Therefore, we strongly encourage the Joint Standing Committee to eliminate or oppose any provision within LD-226 that would permit the continued use of high-GWP substances, including HFCs, or blends thereof, for XPS foam insulation, beyond the proposed effective date of January 1, 2022 for the foam sector.

Hunter Panels appreciates the Joint Committee’s work on environmental leadership. Please contact our industry trade association, the Polyisocyanurate Insulation Manufacturers Association (jkoscher@pima.org), if additional information would be helpful to your legislative process.

Sincerely,

A handwritten signature in cursive script that reads "Matt Peterson".

Matt Peterson
General Manager

Cc: Senator Benjamin Chipman (Ben.Chipman@legislature.maine.gov)
Representative Samuel Zager (Sam.Zager@legislature.maine.gov)