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Thank you for addressing HFCs - but the bill is not strong enough. I live in Sedgwick and have 17 acres in forest management that are severely impacted by wind throw and insect damage, problems that climate change compounds. Climate change hurts many other people too. The Gulf of Maine is one of the world's most rapidly warming waters. And climate change is accelerating (see NASA <https://climate.nasa.gov/evidence/>, World Meteorological Organization <https://news.un.org/en/story/2020/03/1059061> , and more). As Maine's climate plan said, "Maine can't wait."

HFCs are a dangerously powerful greenhouse gas. For example, HFC-134a, one of the HFCs specifically addressed in H.P. 161, is about 1,430 times as potent as carbon dioxide as a greenhouse gas, according to the EPA.

When regulating one needs to be careful about unintended consequences, and the flaws I see here in this bill are that it would lock in too many exemptions and loopholes, and prevent DEP from doing its full job in regulating these highly harmful substances. In many cases there are safe alternatives. In other cases, we can dispense with canisters or aerosols that we frankly just don't need.

I call on you therefore to strengthen the bill in at least the three following ways:

- (1) Allow DEP to further limit these gases as needed, above and beyond what EPA is doing at the federal level;
- (2) Close the loopholes in the exemptions except for medical uses; and
- (3) Include a process for DEP and the state to monitor and enforce compliance, and penalize for non-compliance.

(1) DEP: To fight climate change, Maine should strengthen DEP's ability to regulate these harmful gases, instead of limiting DEP's ability as H.P. 161 currently does or relegating such ability to an undefined future. Please therefore, in line 19 on Sec.2 Rulemaking, insert "AT A MINIMUM" before "as provided", and delete "not" before "regulate", so that the full phrase says: "the department shall regulate each substance and end use at a minimum as provided for in this section and by EPA, and may regulate any substance or end use not addressed in this section" .

(2) Exemptions: Since the time when the federal Environmental Protection Agency (EPA) moved to ban or limit HFC's, including HFC-134a, industry and our innovative economy has had 5 years to develop safer alternatives or determine that some products are in fact not necessary. It is therefore surprising and disappointing that H.P. 161 repeats those same initial exemptions that EPA accepted after pushback from industry (see for example an industry blog post at <https://www.spraytm.com/epa-snap-rule-arrives-at-last.html>), with the goal to give industry time to adapt. Surely safer alternatives now exist for "new adhesives and sealants in large canisters for commercial use," "cleaning of electrical and electronic equipment", or "document preservation sprays" just three of the many and broad exemptions in H.P. 161. Surely we can keep utility lines accessible without using HFC aerosols to spray pesticides around them. And so on. The list of exemptions appears to be even longer in H.P. 161 than EPA's. Please therefore tighten and close these exemptions and loopholes, except for medical uses.

(3) Enforcement: A strong bill usually includes provisions for compliance. This one has none. Without curbing any of DEP's existing authorities and power, please include a process for DEP and the state to monitor and enforce compliance, and penalize for non-compliance.

Thank you.