

Advocacy at NAFEM

NAFEM's advocacy efforts present members' points-of-view to federal, state and local lawmakers, government agencies and other stakeholders. These efforts provide members and the entire commercial foodservice equipment and supplies industry an opportunity to serve as a unifying and leading voice on key issues.



Energy

On behalf of its members, NAFEM monitors proposed changes to and advocates for energy-efficiency regulations, standards, codes and rebates.



Environment

NAFEM's environmentally focused activities include the development of life-cycle and sustainability footprint calculators. The organization also advances the industry's perspective around current and proposed global environmental regulations, standards and codes.



Materials & handling

Before manufacturers ship finished products, they're expected to understand and report on the materials used to make them. Additionally, reduced freight capacity and increased demand for products is making shipping more challenging. NAFEM keeps tabs on these essential functions and shares the latest developments.



Regulations

NAFEM works to help members understand and navigate the latest standards and rules at the local, state, national and global levels. The organization monitors a wide variety of regulatory issues and helps manufacturers of commercial foodservice equipment and supplies speak with a unified voice in comments and testimony before government agencies.



Taxes, tariffs & trade

These issues affect all manufacturers of commercial foodservice equipment and supplies, as well as their customers. NAFEM supports members' interests by collecting the latest information, communicating potential implications and voicing industry perspectives.

Learn more

To learn more, visit nafem.org/advocacy. For other issues or questions, contact Charlie Souhrada, CFSP, vice president, regulatory & technical affairs: +1.312.821.0212; csouhrada@nafem.org.



What we're watching in 2019

2019 is proving to be a busy year for NAFEM's advocacy efforts. Here's a look at some of the key activities we're engaged around or closely monitoring at the local, state and federal level.

Tariffs

- Section 301 tariffs on \$225 billion in Chinese imports remain in effect. President Trump announced plans to impose 10% tariffs on an additional \$200 billion in imports from the country, effective Sept. 1. He also postponed tariffs on the approximately \$100 billion of remaining imports – including some electronics, footwear and clothing – until Dec. 15 to help keep costs down during the holiday shopping season.
- NAFEM has successfully worked to have numerous products used in the commercial foodservice equipment and supplies industry removed from the extensive lists of items subject to tariffs.
- Section 232 tariffs on imported steel and aluminum continue to impact all countries except Argentina, Australia, Brazil, Canada, Mexico and South Korea.
- NAFEM is working with elected officials and allied organizations to communicate the burden tariffs are causing many of its member companies.

USMCA awaiting approval

NAFEM and its members continue to advocate for passage of the United States – Mexico – Canada agreement (USMCA). President Trump is expected to send the agreement to Congress after Sept. 1. House Democrats are meeting with the administration to address their concerns about enforcement of the labor requirements imposed on Mexico in the agreement. Mexico's Senate has ratified the USMCA; Canada has begun the formal process to consider the Agreement.

DOE addressing interim waiver process

The U.S. Department of Energy (DOE) has concluded a public comment period for its proposed improvements to its interim test-procedure waiver process. NAFEM has met regularly with DOE to discuss the industry's concerns with the current interim waiver process and is largely supportive of the proposed rule changes.

DOE/EPA considering regulatory burden reductions

In addition to the proposed interim waiver improvements discussed above, DOE also issued a proposed process rule to modernize and streamline its approaches. Additionally, the U.S. Environmental Protection Agency (EPA) is expected to continue its efforts to understand how to best consider costs and benefits in the regulatory process by issuing a Notice of Proposed Rulemaking yet in 2019. NAFEM submitted comments on these topics to both agencies outlining the need for them to work together and consider the cumulative effort of regulations.

California HFC reduction efforts continue; others follow suit

The California Cooling Act (CCA) reinstated the hydrofluorocarbons (HFCs) reduction targets from Rules 20 and 21 of the previously vacated EPA Significant New Alternatives Policy (SNAP). The CCA required businesses to transition to alternative refrigerants for products sold in the state Jan. 1, with additional deadlines effective Jan. 1, 2020. The California Air Resources Board has recently resumed meeting to discuss further, future HFC reduction strategies.

Wash. recently approved a similar bill. Initial requirements take effect Jan. 1, 2020; additional requirements roll-out thorough Jan. 1, 2024. Canada has also implemented similar regulations.

Colorado prohibits sale of non-ENERGY STAR® certified products; other states considering

A recent Colorado law requires all commercial dishwashers, fryers, hot food-holding cabinets, steam cookers and a variety of other devices sold in the state to meet or exceed ENERGY STAR and WaterSense requirements after Jan. 1, 2021. Other states, including Conn., HI, Ill., Maine, R.I. and Wash. are considering similar legislation.

Trending topics

- Conn, Md, N.Y. and a host of other states have committed to phase out hydrofluorocarbons (HFCs) by adopting vacated rules 20 and 21 of the EPA Significant New Alternatives Policy (SNAP). No target dates have been announced.
- California's South Coast Air Quality Management District has stated its intent to continue addressing NOx emissions from charbroilers and other appliances in the near future.
- Calif. is also looking at proposed legislation to prevent indoor heat-related illnesses by regulating the temperature of indoor places of employment.