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## Comments Filed Electronically – Tuesday, Jan. 17, 2017

Mary D. Nichols Chair  
California Environmental Protection Agency Air Resources Board  
1001 "I" Street Sacramento, CA

RE: Public Comments on the Revised Proposed Short-Lived Climate  
Pollutant Reduction Strategy – November 2016

Dear Ms. Nichols:

The North American Association of Food Equipment Manufacturers (NAFEM) appreciates the opportunity to submit comments regarding the revised draft Short-Lived Climate Pollutant (SLCP) Reduction Strategy, issued November 28, 2016.

NAFEM represents more than 550 members that manufacture commercial foodservice equipment and supplies for the food away from home market. These member companies make the tools used to prepare, cook, serve and store food safely, including a variety of refrigeration and cooking products.

Our association has a long history of supporting the prevention of climate change and the reduction of energy consumption. Working with agencies, such as the U.S. Environmental Protection Agency (USEPA), the U.S. Department of Energy (USDOE) and others, our members take an active role in developing standards and products that are energy-efficient and environmentally-friendly wherever it is technologically and economically feasible.

To this end, we support reducing emissions that contribute to the Global Warming Potential (GWP), and commend the Air Resources Board (ARB) for taking a leading role to address climate change and improve air quality.

On August 1, 2016, a group of NAFEM representatives met with ARB officials to discuss the draft Reduction Strategy for Short Lived Climate Pollutants and the companion 2030 Target Scoping Plan. We are encouraged by the collaborative tone of this discussion and others that followed, to establish a thoughtful process that gradually moves to achieve the SLCP emission reduction target levels.

We affirm that any transition to other refrigerants or types of charbroilers could have severe, negative effects on the industry, the consumer, and the environment, if established without careful consideration.

It is important to keep in mind that any transition to alternative refrigeration will take a significant amount of time. Among the many factors to consider are technological and safety implications, agency approvals, the creation of a diverse product line that leads to a lengthy design cycle, and the potentially adverse effects some alternative refrigerants can have on energy efficiency and energy consumption. There are also important food safety issues that are essential in the development of commercial refrigeration products. If not taken seriously, these factors could have many unintended negative consequences, including public health and safety – our highest priority, loss of jobs and compromising the potential for innovative products foodservice operators need to serve consumer demands.

Additionally, as it relates to black carbon emissions, many NAFEM members make charbroilers for use in commercial cooking. Per the SLCP Reduction Strategy draft, many standards are already in place that help reduce emissions from these machines.

We believe the consideration of the above mentioned factors will contribute to a balanced, achievable, and environmentally sound path forward.

NAFEM and its member companies are eager to continue to work with ARB to research, study and discuss feasible alternatives that will benefit both the consumer and the environment. We look forward to continuing a constructive dialogue on these issues as the ARB moves forward with the SLCP Reduction Strategy.

Respectfully Submitted,



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