

January 19, 2022

The Honorable Gina M. Raimondo  
Secretary  
Department of Commerce  
1401 Constitution Ave, N.W.  
Washington, D.C. 20230

RE: Kigali Amendment  
ETTAC Recommendation 2021-03

Dear Secretary Raimondo:

The Environmental Technologies Trade Advisory Committee (ETTAC) is a federally established committee whose purpose is to advise on the policies and procedures of the U.S. government that affect environmental technology, goods, and services exports. In this capacity, we appreciate the opportunity to provide these comments and suggestions regarding the Administration support for the Kigali amendment to the Montreal Protocol to phasedown hydrofluorocarbons (HFCs).

We commend the Administration for sending the amendment to the Senate for ratification. Ratification would help secure America's place as the global leader transitioning to lower global warming potential (GWP) technologies, provide access to global markets, and give American workers an advantage against global competitors.

HFCs are compounds typically used as refrigerants, foam-blowing agents, etchants, solvents, propellants, and fire suppressants, providing critical services to communities across our nation.

American companies have been active participants in the evolution of the Montreal Protocol and its implementation in the United States for more than 30 years through Presidential Administrations of both parties. Implementation of the Kigali amendment worldwide is projected to increase U.S. manufacturing jobs by 33,000, stimulate \$12.5 billion in new investment in the U.S. economy, and boost HVACR exports by 25 percent.<sup>1</sup> A growing recycling sector for current products also underscores the potential long-term value to consumers.

In addition to ratifying the treaty, we must address the current unfair and potentially illegal trade practices involving the dumping of products and equipment in U.S. markets priced below the cost of manufacturing.

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[https://www.ahrinet.org/App\\_Content/ahri/files/Resources/Economic\\_Impacts\\_of\\_US\\_Ratification\\_of\\_the\\_Kigali\\_Amendment.pdf](https://www.ahrinet.org/App_Content/ahri/files/Resources/Economic_Impacts_of_US_Ratification_of_the_Kigali_Amendment.pdf)

Therefore, we urge the Department to work with your interagency colleagues and members of the U.S. Senate to ensure timely ratification of the Kigali amendment.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. Decker', with a long horizontal flourish extending to the right.

William Decker  
ETTAC Chair