

New Yorkers for Cool Refrigerant Management is a volunteer group that is working on reducing greenhouse gas emissions by advocating for good refrigerant management policies and practices.

New York State is pursuing installing 100,000 heat pumps for heating and cooling by 2025.

NY4CRM is *in favor* of the strategy of installing heat pumps in order to decarbonize buildings.

However, we would like to bring legislators' attention to the important issue of refrigerant leakage. Heat pump operation depends upon a class of chemicals known as refrigerants. Commonly used refrigerants are extremely high GWP chemicals, and the leaks from heat pump systems have the potential to wipe out over half of the emissions reductions that will arise from switching heating from fossil fuel combustion to electric heat pumps. In addition, leaking systems do not operate efficiently, increasing people's heating and cooling costs.

We are asking the NYS legislature to (1) support policies and programs that will reduce leaks and venting and (2) to fast track the approval of lower GWP refrigerants for usage in New York State.

1. We ask the legislature to support NYSERDA in:
  - A. Developing universal standards for installation and maintenance of heat pumps that minimize refrigerant leaks
  - B. Developing universal best practices for end of life refrigerant recovery, reuse, and disposal
  - C. Creating the needed programs to train technicians in these best practices and support their adoption.
  - D. Removing barriers in existing codes and standards to adoption of new low GWP substitutes.

NYSERDA is currently embarking on a pilot project to establish such standards; we would like to see that work fully funded and brought up to scale as quickly as possible.

2. New Yorkers for Cool Refrigerants would like to highlight a section of Governor Hochul's budget **supporting the adoption of newer low GWP refrigerants; we ask the legislature to match it in the one house budget:**

3 § 23. A building code or other requirement applicable to commercial  
4 or residential buildings or construction may not prohibit the use of a  
5 substance authorized pursuant to 42 U.S.C. 7671k. Substances under  
6 review but not yet listed by the United States Environmental Protection  
7 Agency pursuant to 42 U.S.C. 7671k may be allowed for use provided that  
8 such substance and the refrigeration or air conditioning system or other  
9 equipment or products utilizing such substance are designed, installed,  
10 and used in accordance with nationally recognized published standards  
11 that protect building occupant safety and reduce fire risks.

- From Section 23 on page 298 of the attached, this portion is in the Transportation, Economic Development and Environmental Conservation (TED) bill within an energy efficiency package (Part EE "Advanced building codes, appliance and equipment efficiency standards, and building benchmarking act of 2022

<https://www.budget.ny.gov/pubs/archive/fy23/ex/fy23bills.html>