



**GOVERNMENT RELATIONS**

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March 21, 2024

The Honorable David A. Bennett  
Chair, House Committee on Environment and Natural Resources  
State of Rhode Island House of Representatives  
27 Shippee Avenue  
Warwick, RI 02886

Dear Chairman Bennett and Members of the Committee:

Thank you for the opportunity to provide our comments on House Bill 7356 - An Act Relating to Health and Safety – Comprehensive PFAS Ban Act of 2024. We humbly submit our written testimony on HB 7356, and we look forward to working with you and the committee for a balanced science and risk-based solution that protects both environmental and public health –as well as a strong, growing Rhode Island economy.

If we could ever be of a resource or provide your office with additional data, please feel free to reach out to our team of scientists and experts. We appreciate your willingness to engage with us on this issue --should you require additional information or wish to discuss, please do not hesitate to reach out to me at (202) 256-1151.

Respectfully,

Rhoda Washington  
Director, U.S. State & Local Government Relations

Honeywell International, Inc.

Written Testimony

Rhode Island – HB. 7356 An Act Relating to Health and Safety – Comprehensive PFAS Ban Act of 2024

**Honeywell International, Inc.**  
**Written Testimony**  
**Rhode Island - House Bill 7356**  
**An Act Relating to Health and Safety – Comprehensive PFAS Ban Act of 2024**  
**March 21, 2024**

Chairman Bennett and distinguished members of the Rhode Island House Committee on Environment and Natural Resources, thank you for providing stakeholders with the opportunity to submit comments regarding HB 7356. Honeywell International, Inc. is a company with values deeply rooted in human safety and wellness, protecting the health, safety, and wellbeing of public health and environment, and the many communities in which we operate and serve. Through our two facilities in the state and our numerous suppliers and contractors, Honeywell contributes more than \$39 million to Rhode Island’s tax base each year. While we strongly support Rhode Island’s efforts to regulate and address contamination from the PFAS substances that may be of concern, such as PFOA and PFOS, the definition of PFAS included in the bill attempts to regulate PFAS as one group, simply based on their chemical structure. For example, this definition would limit access to safe substances governed under the Federal Drug and Cosmetic Act (FDCA) and regulated by the Biden-Harris Food and Drug Administration (FDA) that are used for packaging for drugs, devices, and supplements and veterinary medicines.

**This overly broad definition would have tremendous impact to small and large businesses located within and those businesses servicing the state with goods and products –not to mention, preventing Rhode Island from reaching its climate goals.** The State of Rhode Island has established aggressive goals to address climate change, positioning Rhode Island to lead by example in energy efficiency and clean energy. The state promotes a 45% target reduction in total emissions, and a pledge to boost heat pumps to 90% of home equipment sales by 2040.

**HFOs are more energy-efficient refrigerants that can help Rhode Island meet its climate and heat pump goals.** HFOs are innovative gases that were purposefully developed to replace high-global-warming-potential substances like HFCs. HFOs have been categorized as having negligible Ozone Depletion Potential, low Global Warming Potential, and are **non-toxic, non-bioaccumulative, and dissipate from the environment in a number of days.** To date, they have already helped avoid the equivalent emissions of more than 329 million metric tons of CO<sub>2</sub> – which is equivalent to **removing 70 million gasoline-powered cars from the roads, each year.**

HFOs are essential for sustainably heating, cooling, and insulating **commercial and residential buildings, automobiles, grocery stores, hospitals, public schools and beyond.** HFO refrigerants are also the lifeblood of electric heat pumps. Ensuring access to EPA-approved HFOs ensures heat pumps continue to be affordable and accessible for Rhode Island.

**HFO technologies support many Rhode Island industries and jobs,** from HVAC contractors to building construction, and throughout the entire cold chain - safely and efficiently moving products from farm through distribution -- to our kitchen tables. That includes supporting countless small businesses across the United States and reducing their energy bills.

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Written Testimony

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Because HFO solutions are more energy efficient, if every supermarket refrigeration system in the U.S. were converted to CO<sub>2</sub> over an HFO, it would require 5.6 TWhr/year of additional electricity usage. The energy savings from using HFOs over alternatives in AC and heat pump applications across the U.S. would be even greater – 44.2 TWhr/year. **For Rhode Island, that would mean enough energy to provide more than 7 years of electricity to every home in the State.**

**HFOs have been heavily studied and rigorously evaluated**, pursuant to the U.S. Clean Air Act and other environmental review programs including the U.S. EPA’s Significant New Alternatives Policy (SNAP) program. As outlined in both the SNAP program as well as in the EPA’s Strategic PFAS Roadmap, the **EPA does not consider HFOs nor their byproducts to be PFAS**. In fact, the Biden-Harris EPA encourages HFOs as an alternative to higher global warming gases in accordance with global sustainability agreements. **This means HFOs are a suitable choice for refrigeration systems and building insulation applications as the world transitions away from high-GWP HFCs**, as outlined in the American Innovation and Manufacturing (AIM) Act and the Kigali Amendment to the Montreal Protocol.

One of the byproducts that certain HFOs can generate when they break down in the atmosphere is a substance called TFA. The quantity of TFA generated from HFOs is relatively small, well characterized and understood. TFA has been extensively studied worldwide, and **all available independent scientific data confirm that TFA will not pose risks to human health or the environment in the foreseeable future.**

It is **important to distinguish HFOs from PFAS that may cause concern, such as PFOA and PFOS, and exclude HFOs from PFAS ban bills**. HFOs are considered environmentally friendly alternatives that support almost every industry - supporting jobs ranging from production line to almost every product found on our local grocery stores shelves. The Biden-Harris Department of Defense has also confirmed HFOs have vital national security applications, and that **broad-based PFAS policies will negatively impact these mission-critical applications**, lowering defense readiness and endangering public safety.

**HFOs are critical tools in enabling a rapid, cost-effective, and responsible transition away from high-GWP legacy products and meeting Rhode Island’s climate goals.** Currently, other states like New Jersey and New Hampshire have recognized the rigorous approach that the EPA has taken to evaluating HFOs and have deferred to its judgement when regulating the chemical. In addition, Maine’s Department of Environmental Protection has recently released amendments to the existing PFAS Law, recommending adoption of SNAP exempted products and removing reporting and notification –changes that will allow for the use of federally approved chemistries and their uses but also saving millions through jobs and consumer costs.

We recommend that Rhode Island follow a similar approach, specifically by enshrining a codified exemption for products which federal regulators have already reviewed and approved, including those approved under the SNAP program.

We look forward to working with you to find balanced science and risk-based solutions that will ensure access to these technologies while addressing the PFAS substances of greatest concern.

Thank you for your time and consideration.

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