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| **EPA SNAP Ruling has Broad Impact on Boatbuilders, Composites and US Manufacturing** |
| Scott Lewit, President of Structural Composites, recently testified at a [Significant New Alternative Policy (SNAP)](http://www.epa.gov/ozone/snap/) hearing in Washington DC supporting NMMA’s position regarding the need for a five year extension for implementation. The SNAP program is EPA's method of evaluating and regulating substitutes for the ozone-depleting chemicals that are being phased out under provisions of the Clean Air Act (CAA). The current EPA SNAP rule requires a phase out of HFC 134a, a specific chemical used by boat builders, by January 1, 2017. HFCs are widely used by boat builders as a blowing agent in floatation foam, but are also used for insulating foams in buildings and as a refrigerant in air conditioning, refrigerators and freezers. As part of an ongoing process to reduce ozone depletion, the EPA originally required hydrochloroflourocarbons (HCFCs)  to replace chlorofluorocarbon (CFC) in these manufacturing processes. Later, in further efforts, HCFCs were replaced by today's hydroflourocarbons (HFC.) However, the newest EPA proposal seeks now to eliminate HFC completely, without a reasonable timeline in place for transition. Industry experts also note that the EPA's proposed replacement chemicals for HFCs lack the technical maturity, supporting infrastructure, scale and certification to be safely used. Lewit commented on the meeting “It was a real eye opener to see how broadly the proposed change will impact the US. The negative impacts reach far beyond the boating and composites industry.  From automotive giants to small business that make walk in freezers, nearly every speaker at the hearing stated that EPA has proposed a very flawed transition timeline. Many agree that the energy inefficiencies caused by the SNAP will cause more green-house gasses, more energy consumption and higher costs all around, to build and operate."NMMA urges boat builders to provide written comments to the EPA on the proposed rule, indicating that the current plan is flawed, will hurt our industry, and that we need more time to identify , qualify and implement suitable, safe alternatives. Comments must be submitted before October 6, 2014. To view the federal register notice and find instructions on submitting comments, [click here](http://www.gpo.gov/fdsys/pkg/FR-2014-08-06/pdf/2014-18494.pdf).For more information from the EPA, contact Rebecca von dem Hagen, Stratospheric Protection Division, Office of Atmospheric Programs, at vondemhagen.rebecca@epa.gov.Additional questions? Contact John McKnight at jmcknight@nmma.org. |