



December 7, 2020

Clerks' Office  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

*Submitted electronically at [arb.ca.gov](http://arb.ca.gov)*

**Re: NAMA Comments to CARB on Proposed Amendment to the Prohibitions on Use of Certain Hydrofluorocarbons**

The National Automatic Merchandising Association (NAMA), representing hundreds of large and small businesses that provide vending, coffee and convenience services to thousands of customers in California each day, appreciates the opportunity to submit the following comments regarding the phase out of HFC refrigerants in the State of California.

Founded in 1936, the National Automatic Merchandising Association (NAMA) is the association representing the \$31 billion U.S. convenience services industry, with its core membership being comprised of owners and operators of vending machine, micro market, and coffee, tea and water service and pantry service companies. With nearly 1,000-member companies – including many of the world's most recognized brands – NAMA provides advocacy, education and research for its membership. In California, the convenience services industry represents over, \$2.8 billion in economic impact and nearly 13,000 jobs.

The convenience services industry is committed to a transition away from Hydrofluorocarbons (HFC's) in a timely, efficient, and business feasible manner, however there are several issues that necessitate an extension for implementation in order to do so. Specifically, placement restrictions under national safety standards by the American Society of Heating and Air-Conditioning Engineers (ASHRAE) and Underwriters Laboratories (UL) for machines using HC R-290.

NAMA has been steadfast in its efforts to amend these standards, and as of November 17, 2020, both UL 541 and ASHRAE 15 were successfully amended to allow for placement of vending machines utilizing R-290 public buildings. Machine Manufacturers in the U.S. can now begin producing these advanced, energy efficient, and eco-friendly machines for use in the marketplace.

NAMA has engaged with other states and the U.S. Climate Alliance, to urge a phase out implementation dates of January 1, 2022. To date, all 15 other states that have proposed or enacted hydrofluorocarbon (HFCs) phase-outs have agreed to NAMA's requested deadline due to the industry's unique placement issue.

**We respectfully urge the California Air Resources Board to consider amending the implementation date for refrigerated vending machines to January 1, 2022.**

Extending the date for compliance for new refrigerated vending machines will allow ample time for the industry to begin production and provide operators with viable alternative machines utilizing lower global warming potential (GWP) refrigerants, and bring California's deadline with these other states – allowing for uniformity for industry throughout the nation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike Goscinski". The signature is fluid and cursive, with a prominent loop at the end.

Mike Goscinski  
Director, Federal and State Affairs