ASSOCIATION OF HOME APPLIANCE MANUFACTURERS

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TESTIMONY

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On Behalf of
The Association of Home Appliance Manufacturers

Before the Colorado House
Energy and Environment Committee

HEARING
HB 25-1161

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Chair Valdez, Vice Chair Velasco, and members of the Environment and Energy Committee, the Association of Home Appliance Manufacturers (AHAM) appreciate the opportunity to provide comment on HB 25-1161, which would require the labeling of gas-fueled stoves. This proposal is unnecessary as existing Standards provide consumers with robust protection from gas cooking emissions. AHAM supports effective ventilation, which is the key to enhancing indoor air quality. Recent building code updates have focused on improving ventilation in newer homes, which are constructed to be more airtight than older homes. AHAM supports appropriate and accurate science-based warning labels for all cooking surface products. However, as currently drafted, AHAM is opposed to HB 25-1161.

AHAM represents more than 160 member companies that manufacture 90% of the major, portable and floor care appliances shipped for sale in the U.S. Home appliances are the heart of the home, and AHAM members provide safe, innovative, sustainable and efficient products that enhance consumers' lives.

The home appliance industry is a significant segment of the economy, measured by the contributions of home appliance manufacturers, wholesalers, and retailers to the U.S. economy. In all, the industry drives nearly $200 billion in economic output throughout the U.S. and manufactures products with a factory shipment value of more than $50 billion.

In Colorado, the home appliance industry is a significant and critical segment of the economy. The total economic impact of the home appliance industry to Colorado is $1.7 billion, approximately 12,000 direct and indirect jobs, $260.9 million in state tax revenue, and more than $610.5 million in wages. The home appliance industry, through its products and innovation, is essential to consumer lifestyle, health, safety and convenience. Home appliances also are a success story in terms of energy efficiency and environmental protection.

Existing Standards Negate the Need for a New Label

Gas cooking is an affordable and preferred technology used in 40 percent of U.S. homes[1]. All cooking products, including gas ranges and cooktops, meet or exceed current safety standards and building code requirements. The Standard for household cooking gas appliances, CSA/ANSI Z21.1/CSA 1.1, was developed in compliance with the Standards Council of Canada requirements for National Standards of Canada and approved by the American National Standards Institute (ANSI).[2] The Standards that protect consumers from exposure to harmful byproducts, undergo regular updates, which includes:

- ASHRAE 62.2-2022 -- Ventilation and Acceptable Indoor Air Quality in Residential Buildings. **Includes a provision that all cooking should be vented externally**, not just gas.

[1] https://www.eia.gov/consumption/residential/data/2020/state/pdf/State%20Appliances.pdf

[2] https://webstore.ansi.org/standards/csa/csaansiz21242024?srsltid=AfmBOoqDRWyUQ3jDMGhzrXrbArZzFB261KLdtilnWDxs676liGcivxmD

- ANSI Z21.1 -- Protects consumers from exposure to carbon monoxide. AHAM submitted a request to add a test method for the measurement of NO_2. A 2024 research study of the actual emissions through two different measurement points will be used to support the development of the final test method.

Ventilation is Key

All cooking—whether gas or electric—emits pollutants, and most indoor air quality issues associated with cooking can be effectively addressed through ventilation. As homes have become more tightly constructed, the need has grown for specific steps aimed at improving ventilation. That is why building codes have long required mechanical ventilation and external cooking exhaust in newly constructed more airtight homes. This is just one of many solutions that can improve indoor air quality while cooking.

Regulators in California recognize the importance of ventilation. Recently, the Lawrence Berkeley National Laboratory studied California's ventilation system requirements for the California Energy Commission. The study found that their proposed updated ventilation requirements were adequate to protect consumer health and safety from a variety of sources, including kitchen sources of airborne contaminants.[3] Recent building codes (including Title 24-2022) were, in fact, developed through the application of these standards.

Indisputably and by far the most important improvement in indoor air quality related to cooking of any type is improved ventilation, primarily, but not exclusively, to deal with particulate matter, especially $PM_{2.5}$, emitted during both gas and electric cooking and originating in the foodstuffs cooked.

We support further public educational campaigns aimed at building owners, consumers, public housing authorities, and other entities to install and use improved ventilation in residences, including, but not limited to, the proper use and installation of ventilation devices such as exhaust hoods and fans.

Conclusion

Though we are opposed to HB 25-1161, we remain committed to the development of standards. Regardless of the fuel type used for cooking, the appropriate installation and use of improved ventilation in residences, such as exhaust hoods and fans, is key to the enhancement of indoor air quality. Thank you for the opportunity to comment.

[3] https://eta-publications.lbl.gov/sites/default/files/indoor_air_quality_in_california_homes_with_code-required_mechanical_ventilation_0.pdf