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# AB 32 Implementation Group

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Working Toward Greenhouse Gas Emission Reductions  
And Enhancing California's Competitiveness

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**Our Mission:** Our coalition represents large and small businesses that are vital to California's economy and that provide hundreds of thousands of jobs. Our mission is to be a constructive voice in the process to implement AB 32 (The Global Warming Solutions Act) and ensure that the greenhouse gas emission reductions required under AB 32 are achieved while maintaining the competitiveness of California businesses and protecting the interests of consumers and workers.

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## **AB 32 Implementation Group Principles**

The coalition advocates that AB 32 be implemented consistent with the following principles:

- **Provide Regulatory Certainty**

The Administration and regulators should move swiftly to ensure that companies understand the impact of AB 32 on new investments in the state and receive recognition for energy efficiency projects that save energy and reduce greenhouse gas emissions. The regulatory uncertainty that currently exists under AB 32 threatens new investment in California.

- **Adopt Policies that Keep Jobs in California and Achieve Global Emission Reductions (Leakage)**

As AB 32 is implemented, agencies must carefully evaluate its impact on California companies to ensure that implementation does not force companies to leave California or expand elsewhere. This outcome would transfer the location of greenhouse emissions rather than actually reduce them.

- **Use Sound Scientific Methods of Review**

The AB 32 process should be established through a rigorous, scientifically valid manner subject to an open process that allows adequate time for expert review. This is particularly important in establishing emissions inventories, baselines and allocations.

- **Impose Only Cost-Effective & Technologically Feasible Regulations**

AB 32 requires that regulations to reduce emissions must be cost-effective and technologically feasible. Our coalition strongly supports this directive because it helps ensure that AB 32 will not increase costs for consumers, threaten jobs or make California companies uncompetitive.

- **Promote Innovation and Market-Based Strategies**

Implementation of AB 32 should emphasize policy choices that promote technological innovation and the efficiency of market-based strategies and that include adequate regulatory certainty, reasonable timelines and permit streamlining.

- **Minimize and Fairly Allocate Compliance Costs**

AB 32 implementation should minimize compliance costs and administrative fees to protect California jobs and consumers. Furthermore, the administrative costs of implementing AB 32 should be borne equitably across all sectors.

- **Link to Regional and National Climate Policy Initiatives**

AB 32 Implementation Group recognizes the need and momentum for other states and countries to adopt climate policies to prevent negative impacts of climate change. We promote policies that will link with regional, national and ultimately global efforts, that will support economic development for all participants, and that avoid unfair burdens on California.

- **Coordinate AB 32 with Existing Air and Environmental Quality Standards**

California currently maintains strict air and environmental quality standards. AB 32 goals for maximizing co-benefits and addressing environmental justice should not add new layers of environmental regulations but rather be coordinated with existing regulations to achieve cost-effective and efficient results.