



## **MEMO OF SUPPORT**

### **S.2471 (Parker)**

### **Greenhouse Gas Emission Accounting System**

MACNY – The Manufacturers Association, and The Manufacturers Alliance of New York strongly support S.2471, which would align the state’s greenhouse gas accounting system with internationally recognized standards.

New York currently utilizes a 20-year global warming potential (GWP), which significantly increases the calculated impact of methane relative to the widely accepted 100-year IPCC standard used federally and internationally. This divergence artificially inflates reported emissions and risks driving higher emission costs than necessary. By adopting a 100-year GWP and aligning lifecycle methodologies, S.2471 helps ensure that compliance obligations under New York emissions reductions programs are grounded in internationally accepted science. This alignment will help moderate cost impacts on ratepayers and manufacturers alike.

Manufacturers and large industrial facilities are particularly vulnerable to emissions leakage which occur when businesses shift production to jurisdictions with lower regulatory costs. Many members are energy-intensive and trade-exposed industries operating in highly competitive national and global markets. When energy and compliance costs rise disproportionately in New York, production and associated jobs migrate elsewhere, often to jurisdictions with weaker environmental standards. This undermines our state’s economic and climate objectives.

Manufacturers already face some of the highest electricity and energy costs in the nation. Policies that inadvertently inflate emissions risk increasing allowance prices under programs such as New York’s proposed Cap-and-Invest program, driving higher energy rates that are borne by both businesses and households. Aligning New York’s greenhouse gas accounting system with the IPCC and federal standards is a pragmatic and economically responsible step that supports both climate progress and economic competitiveness.

For these reasons, we strongly support S.2471.

**ABOUT MACNY:** [MACNY, The Manufacturers Association](#), is a 113-year-old non-profit organization representing manufacturers and other non-industrial service providers throughout Central New York. With a commitment to enhancing economic development and workforce opportunities, MACNY serves as an advocate for manufacturers, offering a wide array of

programs and services to help businesses grow and thrive in a competitive global market.

**ABOUT THE MANUFACTURERS ALLIANCE OF NEW YORK:** The Manufacturers Alliance of New York is a statewide organization comprised of nine manufacturing associations, united to advocate for the manufacturing community in Albany and Washington.