



**LEGISLATIVE POSITION:  
UNFAVORABLE  
Senate Bill 528  
Climate Solutions Now Act of 2022  
House Environment & Transportation Committee**

**Thursday, March 24, 2022**

Dear Chairman Barve and Members of the Committee:

Founded in 1968, the Maryland Chamber of Commerce is the leading voice for business in Maryland. We are a statewide coalition of more than 5,500 members and federated partners, and we work to develop and promote strong public policy that ensures sustained economic recovery and growth for Maryland businesses, employees, and families.

SB 528 is an extensive and dense piece of legislation proposing major changes to Maryland's policies relating to the emission of greenhouse gas. Despite the many different and worrisome proposals, the Maryland Chamber of Commerce has a few primary concerns with SB 528 as introduced:

1. Maryland's existing climate plans are required to achieve a greenhouse gas reduction target while simultaneously increasing jobs and economic benefits. The current plan meets that standard and is therefore a win-win for Maryland. SB 528 changes the current standard by modifying the net benefit test to compare proposals to "no-action" by the rest of the world. By comparing jobs and economic impacts to a global climate catastrophe than any measure, no matter how draconian, will be a positive.

**SB 528 essentially eliminates the requirement that the plan result in a net economic benefit to the State's economy and a net increase in jobs.**

2. The GHG reduction goals outlined in SB 528 are more stringent than those recommended by the Biden Administration or international organizations such as the United Nations. The net-zero goals by 2050, which have been widely accepted, has been used by the private sector in sustainability plans almost exclusively. SB 528 does no more than move the goal post on targets that have been the basis of GHG reduction plans across the State.

3. Further, SB 528 imposes a building tax on existing commercial buildings for greenhouse gas emissions attributable to the buildings failure to meet energy use intensity targets set by the department. For a sector that is under enormous pressure from the economic fallout of COVID-19, levying an additional tax will only further harm anemic recovery.

SB 528 creates significant challenges for existing businesses and future economic development in Maryland. This legislation effectively removes the consideration of economic impact from the State's GHG reduction plans. It adds a new tax on businesses and upends many corporate GHG reduction and sustainability plans by setting goals out of line with our federal government and international organizations. Finally, it places Maryland at a significant regional economic competitiveness disadvantage.

For these reasons, the Maryland Chamber of Commerce respectfully requests an **unfavorable report** on SB 528.

