



## AHRI Policy Position Chlorocarbon Refrigerant Feedstock Bans

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The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) is the trade association representing manufacturers of heating, ventilation, air-conditioning, refrigeration (HVACR) and water heating equipment within the global industry. AHRI's more than 320 member companies account for over 90 percent of HVACR and water heating residential and commercial equipment manufactured and sold in North America.

### Background on Industry Use of Chlorocarbons

AHRI member companies are dedicated to manufacturing clean, safe refrigerants and highly effective and efficient heating, cooling, and refrigeration systems that utilize those refrigerants and benefit consumers.

Chlorocarbons, including trichloroethylene (TCE) and perchloroethylene (PCE), are commonly used as feedstock in the production of certain refrigerants necessary to commercial and residential HVACR equipment. During the production of these refrigerants, the chlorocarbon is consumed and converted into products, such as refrigerants, except, in some cases, for trace quantities. Any trace quantities present would be a byproduct of refrigerant manufacturing and could also be found in small quantities in HVACR equipment. They do not pose a risk to public health and may not be able to be completely removed from the manufacturing process.

Note that refrigerant manufacturing uses chlorocarbons in closed systems in ways that do not emit the chlorocarbon into the air or surrounding environments. Again, this ensures industry's use of chlorocarbons for the production of refrigerants does not negatively impact public health or the environment.

### Industry Position and Policy Considerations

Manufacturers are opposed to any state regulatory or legislative efforts to ban the use of chlorocarbons as a refrigerant feedstock or where trace amounts of the chlorocarbon remain in a refrigerant after it is consumed or transformed in a closed system. Legislation that prohibits the use of certain chlorocarbons could directly impact the refrigerant supply chain and cause serious barriers to the continued manufacturing of refrigerants and/or equipment in a state.

As previously stated, the use of chlorocarbons by the HVACR and water heating industry in the production of refrigerants is not harmful to the environment or public health. Thus, legislation that proposes to prohibit the use of chlorocarbons should include an exemption for processes where only trace amounts of the chlorocarbon remain after the chlorocarbon is consumed or converted into a product that is critical to society. An exemption should also be included that clarifies the ban does not apply to the use of the chlorocarbon in closed systems.

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