



AHRI Policy Position Hydrofluorocarbon Phasedown Legislation and Rulemakings

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

Governments have been regulating hydrofluorocarbons (HFCs), including refrigerants, for decades around the world. In an effort to stem a growing patchwork of regulations, AHRI strongly supported the agreement to amend the Montreal Protocol on Substances that Deplete the Ozone Layer to phase down the production and consumption of HFCs as a proven, predictable, and practical approach to addressing environmental concerns while ensuring that critical societal needs continue to be met (e.g. life-saving comfort-cooling and food preservation).

AHRI continues to work closely with governments both foreign and domestic to prepare and successfully execute the safe and orderly transition to low-global warming potential (GWP) refrigerants, including federal and state legislators developing HFC phasedown legislation. While AHRI would prefer to see a federal framework for regulating the phase down of HFCs, AHRI will continue to work with states that have announced an intent to regulate HFCs, to ensure the regulations are implemented in a way that is practical and feasible for industry, and protects society's need for these critical products.

Industry Position and Considerations

As of August 2020, 25 Governors have committed to implementing policies that meet the Paris Climate Agreement, including HFC regulations as a critical component. Thus, in the absence of a federal framework, the HVACR industry will continue to face a growing number of states that pursue implementation of HFC regulations via legislation or existing regulatory authority.

To harmonize state transitions, AHRI supports the adoption of prohibitions on HFCs in EPA SNAP Rules 20 and 21. AHRI opposes disclosure, labeling, and reporting requirements. If these provisions are included, AHRI urges maintaining flexible disclosure options, self-reporting, and recordkeeping for audit purposes only. AHRI also supports state policies providing incentives and allowing the use of reclaimed refrigerant in existing equipment.

AHRI notes that many next-generation low-GWP refrigerants will likely need updated safety standards in state building codes. AHRI urges the adoption of the latest industry consensus standards, including UL 60335-2-40 and ASHRAE 15 standards, to allow refrigerants with the lowest impact to be used in HVACR equipment.

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