



AHRI Policy Position Plastics and Single-Use Packaging

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

Quality of life encompasses complex economic and social considerations, requiring both environmental protection and economic development. Environmental laws and regulations, including those that focus on reducing waste from plastics and packaging materials, should be designed with the utmost care to ensure they are effective in achieving their desired objectives while also avoiding adverse economic, public health, or social impacts.

To that end, the HVACR and water heating industry supports efforts to reduce waste from plastics and single-use packaging materials. AHRI member companies strive to be strong environmental stewards; manufacturers work diligently to design products that minimize waste and maximize recyclability. The industry also supports efforts to increase recycling of consumer-facing products and establish the infrastructure required to reduce and reuse single-use packaging and waste.

It is important to note, however, that AHRI members manufacture highly complex and technologically sophisticated equipment that must be safely transported throughout the supply chain. A wide variety of packaging and plastic materials are used during transport, distribution, and storage of HVACR and water heating equipment; in many cases, those materials never reach the consumer. The ability to utilize these packaging materials is critical to ensuring HVACR and water heating equipment reaches its destination without damage. For this reason, AHRI encourages policymakers to distinguish between non-consumer-oriented packaging (also known as transport or tertiary packaging) and point-of-purchase packaging (also known as primary, sales, grouped, or secondary packaging).

Non-consumer-facing packaging and point-of-purchase packaging require different recycling and waste management processes. In fact, many companies already recover large portions of their non-consumer facing packaging to lower costs and achieve company sustainability goals. AHRI encourages policymakers to recognize these efforts and the need to allow companies the flexibility to package highly specialized HVACR and water heating equipment in a way that prevents damage. Damaged products often need to be scrapped and replaced, thus causing unforeseen environmental consequences. Due to this, broad efforts to create stewardship programs and regulatory frameworks that do not properly account for non-consumer-oriented packaging and provide exemptions for it can create an unsustainable and unfulfillable mandate on manufacturers.

AHRI also recognizes that waste management and recycling efforts are costly, but the cost of these policies and programs should not be placed solely on manufacturers. Any policies that aim to reduce the usage of

plastics and single-use packaging should include proper infrastructure and the financial support necessary to implement them. Further, any regulatory authority granted to enact these programs must be both properly funded and not overly broad in scope, aiming to reduce the greatest amount of waste without creating an unsustainable or impractical mandate.

AHRI urges that legislators and regulators collaborate with industry in the development of proposals to reduce plastics and single-use packaging waste. AHRI and our members can provide technical feedback and expertise about the most effective approaches to achieve these goals and identify where reducing plastics and packaging usage might be feasible, both from an engineering and economic standpoint.

Industry Position and Policy Considerations

AHRI supports policies that expand recycling infrastructure and programs that encourage viable and sustainable reuse and recycling. However, we oppose proposals that place the burden of reducing or eliminating plastics and single-use packaging only on manufacturers.

In addition, due to the need for packaging that is non-consumer facing for storage and transport of products, we oppose efforts to ban single-use packaging that is used to store or transport manufacturers' products (i.e. non-consumer oriented, transport, or tertiary packaging). However, AHRI can support proposals that include exemptions for this type of packaging.

AHRI opposes requirements for 100 percent recyclable content in non-consumer-oriented packaging, as some single-use plastics and packaging materials are necessary for the protection of products and recycling options are limited.

AHRI encourages policies that include reasonable source reduction requirements that differentiate between point-of-purchase and non-consumer-oriented packaging. AHRI is also willing to work with policymakers to clarify the need for balance between source reduction and the importance of preventing damage to products.

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