

February 4, 2023

RE: Building code legislation to support HFC phasedown

In December 2020, former President Trump signed into law the American Innovation and Manufacturing Act (AIM Act), which directs the U.S. Environmental Protection Agency (EPA) to issue rules that will phasedown the use of hydrofluorocarbons (HFCs) and authorizes EPA to restrict the use of HFCs in certain applications, such as commercial refrigeration, chillers, and stationary air conditioning equipment. As a result, building codes in all fifty states must be updated to enable the safe, efficient transition to HFC replacement refrigerants in HVACR equipment. Manufacturers, distributors, contractors, and consumers need the building code update to be completed as soon as possible before the refrigerant transition goes into effect. To that end, states must adopt legislation specifying that building codes cannot prohibit the use of a substitute refrigerant allowed by EPA.

HFCs are chemicals, with a high global warming potential, that are typically used in refrigerants. Today, HVACR manufacturers use HFCs in most of the equipment they produce. The new federal regulations will require manufacturers to begin producing equipment that utilize new substitute refrigerants that have a lower global warming potential. Over the past decade, the HVACR industry has spent hundreds of millions of dollars preparing for this transition. We have invested in research and development, facility construction and expansion, and training, to ensure a safe and efficient transition when the federal regulations go into effect in the U.S.

This orderly, national transition will allow U.S. manufacturers to maintain technological leadership in the global HVACR marketplace, while creating new domestic jobs and driving domestic economic growth. The phasedown is projected to create 33,000 new manufacturing jobs and will also help sustain 138,400 existing jobs between now and 2027, while increasing direct manufacturing output by \$12.5 billion.¹

State legislation is essential to the orderly and effective phasedown of HFCs, and we urge states to pass legislation that will ensure a victory U.S. manufacturers, distributors, contractors, and consumers by preparing for an orderly transition to next generation refrigerants.

Signed,

Air-Conditioning, Heating, and Refrigeration Institute
Alliance for Responsible Atmospheric Policy
Heating, Air-conditioning, & Refrigeration Distributors International
Plumbing-Heating-Cooling Contractors—National Association

Contact: Mike Nerozzi, Director of Government Affairs, AHRI – mnerozzi@ahrinet.org

¹ “Economic Impacts of U.S. Ratification of the Kigali Amendment.” Industry Forecasting at the University of Maryland (INFORUM) and JMS Consulting, 2018.