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November 21, 2025

Assistant Administrator Aaron Szabo
U.S. Environmental Protection Agency
Office of Air and Radiation
EPA Docket Center (EPA-HQ-OAR-2025-0005)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Comment on “Phasedown of Hydrofluorocarbons: Reconsideration of Certain Regulatory Requirements Promulgated Under the Technology Transitions Provisions of the AIM Act of 2020” (Docket ID EPA-HQ-OAR-2025- 0005)

Dear Assistant Administrator Szabo:

The Air Conditioning Contractors of America (ACCA) is the leading national association representing heating, ventilation, air conditioning, and refrigeration (HVAC-R) contractors. Our over 3,000 member companies are recognized as industry leaders and are responsible for \$88 billion in annual sales. They are responsible for designing, installing, and maintaining HVAC-R systems that heat and cool homes, protect our food supply, ensure the possibility of modern medicine, and enable data centers to operate.

ACCA appreciates the opportunity to comment on the Environmental Protection Agency’s (EPA’s) reconsideration of the Technology Transitions Rule and strongly supports its proposal to remove the installation compliance date for residential and light commercial air-conditioning and heat pump systems manufactured or imported before January 1, 2025, under 40 CFR part 84, subpart B.

ACCA further supports the removal of the installation deadline for Variable Refrigerant Flow (VRF) and Variable Refrigerant Volume (VRV) systems, which face similar design, distribution, and installation constraints as other light commercial systems. ACCA supports maintaining existing manufacturing and import deadlines for residential and commercial space heating and cooling equipment to ensure market stability but urges EPA to eliminate installation deadlines that serve no environmental purpose and create unnecessary economic and operational risk.

Background and need for action

The 2023 Technology Transitions Rule originally established an installation restriction beginning January 1, 2025, for systems using refrigerants with a global warming potential (GWP) above 700, including R-410A, which were the most common systems used in residential and light commercial settings before the implementation of the AIM Act’s phasedown of hydrofluorocarbons (HFCs). This created an untenable situation, which resulted in EPA’s interim final rule issued on December 26, 2023 (88 FR 88825). The interim final rule extended the installation deadline for R-410A systems by one year, to January 1, 2026, for systems manufactured or imported before 2025. While most eligible systems will likely be sold off by January 1, 2026, this arbitrary installation deadline would still needlessly limit product availability and flexibility on installation timing. These circumstances would strand legally manufactured and imported equipment for no legitimate reason.

The same rationale applies to VRF and VRV systems, which often have longer design and construction timelines due to the scale and complexity of the projects in which they are used. These systems are frequently ordered months or even years in advance, with installation dependent on building completion



schedules beyond the control of contractors. Imposing an installation cutoff on pre-2025 manufactured VRF and VRV systems would needlessly penalize contractors, developers, and consumers who made good-faith investments based on existing regulatory guidance. EPA should extend the removal of the installation compliance deadline to VRF and VRV equipment, consistent with the treatment of other residential and light commercial systems.

Impact on contractors and consumers

The supply shortage that the HVAC-R industry experienced during the summer of 2025 underscores the need for a practical and sensible transition policy. Removing the installation compliance date will allow contractors to obtain, sell, and install systems that were lawfully manufactured or imported before 2025 without the risk of those units being unnecessarily stranded due to arbitrary compliance deadlines. This action will preserve inventory value and protect small businesses from financial losses associated with unsellable stock. For consumers, it will extend access to affordable and available systems and reduce installation delays.

VRF and VRV system installations are among the most capital-intensive projects in the HVAC-R sector. Delays or cancellations caused by an arbitrary installation cutoff could halt or significantly delay construction projects and impose millions of dollars in additional costs. Removing the installation deadline would reduce overall financial exposure without affecting the total number of units manufactured or environmental compliance outcomes.

Supporting market stability

Eliminating the installation deadlines does not expand the volume of R-410A equipment legally manufactured or imported before January 1, 2025. Rather, it simply allows lawful, pre-2025 inventory to be installed until it is sold through. The total number of systems that will ultimately use legacy refrigerants remains consistent with the EPA's own modeling in the 2023 Technology Transitions Rule, meaning no additional environmental impact beyond what was already projected. This adjustment will help prevent artificial and avoidable supply chain bottlenecks that increase costs and benefit bad actors who have no interest in complying with EPA's mandates, thus undercutting law-abiding contractors. By allowing contractors to install available inventory while the HVAC-R market continues to normalize around A2L refrigerants, EPA will help maintain public confidence in the phasedown process and avoid unnecessary disruptions.

ACCA also encourages EPA to remain mindful of the cumulative impact of multiple regulatory changes on overall HFC allocation and market balance. Changes that accelerate the drawdown of available HFC allowances or prematurely force a transition toward highly-flammable A3 refrigerants could undermine the orderly and safe adoption of A2L alternatives. ACCA urges the Agency to structure any relief or revisions under this reconsideration in a manner that preserves long-term allocation stability and does not inadvertently hasten transitions beyond what the marketplace can safely absorb.

We are also concerned that states may respond to additional federal changes with a worsening patchwork of state rules. In the absence of federal preemption under the AIM Act, several states are pursuing accelerated regulatory timelines that effectively mandate a transition to A3 refrigerants. These state efforts undermine the coordinated national phasedown that Congress and President Trump intended when enacting the AIM Act. A3 refrigerants pose materially different installation, ventilation, and ignition-risk challenges than A2Ls, and the rapid transition schedules under consideration in some states would force contractors to navigate incompatible codes, unavailable equipment, and unclear liability exposure. As such, we recommend that EPA use whatever authority it possesses (whether through guidance, technical findings, formal advisories, or coordination with states) to discourage a patchwork of state refrigerant regulations.

Implementation and compliance considerations

ACCA supports EPA's intent to preserve basic recordkeeping requirements, showing that eligible systems were manufactured or imported before January 1, 2025. Maintaining existing documentation and labeling practices is sufficient to ensure transparency without imposing new burdens on small businesses. We further recommend that EPA avoid any new paperwork or reporting obligations, as existing data collection processes under current rules are adequate to monitor market activity.

The agency should make the installation deadline removal effective immediately upon publication and provide clear, plain-language guidance for contractors and distributors explaining eligibility and compliance expectations. Since the publication of the final rule seems unlikely before January 1, 2026, the agency should also provide prompt and formal assurance that no enforcement action will be taken against contractors and technicians who install covered residential and light commercial systems between January 1, 2026, and the date of publication.

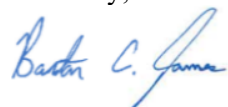
Conclusion

The supply disruptions of 2025 demonstrated that well-intentioned deadlines can have unintended consequences for consumers and small businesses when refrigerant and equipment availability cannot keep pace with regulatory timelines. Removing the installation compliance date for residential and light commercial systems manufactured or imported before January 1, 2025, is a sensible, low-risk correction that prevents stranded inventory, supports contractors, promotes consumer choice, and preserves the environmental objectives of the AIM Act. Extending this same relief to VRF and VRV systems is equally warranted and necessary to ensure consistency across the marketplace.

ACCA reiterates its support for maintaining existing manufacturing and import deadlines for residential and commercial space heating and cooling equipment to ensure market stability but strongly opposes installation deadlines that artificially constrain lawful commerce and penalize small businesses.

ACCA appreciates the EPA's attention to real-world implementation challenges and its continued engagement with contractors and the broader HVAC-R industry. We urge the agency to finalize this proposal promptly to ensure contractors and consumers alike are protected from needless supply and scheduling disruptions.

Sincerely,



Barton C. James
President & CEO
Air Conditioning Contractors of America