



## Breaking News

# Rheem Government Affairs

December 1, 2023

## Update Regarding AIM Final GWP Limit Rule

### ***EPA Response Letter to Industry***

On November 29<sup>th</sup>, the U.S. EPA issued written responses to AHRI, The Alliance for Atmospheric Policy, and HARDI, regarding concerns raised about the install-date provisions in the final rule entitled “Restrictions on the Use of Certain Hydrofluorocarbons Under the American Innovation and Manufacturing Act of 2020” (88 FR 73098, October 24, 2023).

In the response letter, EPA acknowledges the serious industry concern about the potential for stranded inventory within the air conditioning subsector.

EPA recognizes that reconsideration is necessary for systems subject to a January 1, 2025, and a January 1, 2026, installation compliance date. The EPA therefore intends to act swiftly to address concerns regarding the January 1, 2025, installation compliance date, including by potentially amending the final regulation to allow for installation of previously manufactured components until January 1, 2026, and separately intends timely consideration of VRF systems

**Rheem is encouraged, based on this letter, that EPA will amend the January 1, 2025, installation date deadline to resolve the industry’s concerns with AC/HP and VRF systems.**

Next steps:

- AHRI, the Alliance, and HARDI will continue to engage with EPA on the specifics of the rulemaking processes, including timing.
- EPA is expected to issue a rule revision for AC/HP in the next 2-3 months, if not sooner.
- The VRF rule would follow in the early part of 2024.

EPA has also posted additional information to their [FAQ page](#).

## Key Takeaways

EPA intends to act swiftly to address concerns regarding the January 1, 2025, installation compliance date for residential heat pump and air conditioning systems including by potentially amending the final regulation to allow for installation of previously manufactured components until January 1, 2026

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Separately, EPA intends timely consideration of industry concerns related to VRF systems.

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For more information on the final rule, including EPA fact sheet and FAQs, see the rulemaking page: <https://www.epa.gov/climate-hfcs-reduction/regulatory-actions-technology-transitions>

