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## Regulatory Update

### Rheem Government Affairs



October 2, 2025

## Proposed Changes to GWP Rule under AIM

### *EPA Releases Details of Technology Transitions Rule Changes*

On September 30<sup>th</sup>, the U.S. EPA pre-published a draft rule amending certain provisions of the 2023 Technology Transitions Rule under the AIM Act. EPA had previously signaled reconsideration of the rule in March of 2025.

The proposed changes generally do not affect production of new air conditioning or heat pumps, but they do impact the disposition of existing inventory of legacy equipment. In commercial refrigeration, the changes are more substantial, particularly in the subsectors of cold storage and supermarkets using remote condensing units.

In summary:

- The proposal affirms the 2025 prohibition date for new R-410A equipment production for AC/HP and 2026 for VRF and delays certain compliance dates for refrigeration.
- Refrigeration compliance dates for 150/300 GWP are delayed to 2032 for remote condensing units, with interim GWP limits beginning in 2026 (see table on next page).
- EPA eliminates the January 1, 2026 installation deadline for split air conditioning and heat pumps manufactured or imported prior to January 1, 2025. There is no change to the three-year sell through for packaged products.
- Components remain exempt from rule prohibitions, so component manufacture may continue for R-410A compressors, service coils, etc. as long as they are intended and labeled for service of existing systems.

Next steps:

- EPA will accept public comments for 45 days following publication in the *Federal Register* and may also conduct a virtual public hearing.
- 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 final rule on or around the end of the year, with an effective date 30 days after publication. The ongoing government shutdown may affect this timing.

Rheem Government affairs remains close to the rule development process and will provide additional updates as they are available.

## Key Takeaways

EPA proposes to eliminate the installation deadline for legacy AC/HP made prior to 2025.

Amendments include significant changes to GWP limits and compliance dates for new equipment in refrigeration subsectors.

There are no changes to the prohibition on manufacturing and import of complete R-410A systems.

For more information on the proposed rule, including EPA fact sheet, see the rulemaking page:

<https://www.epa.gov/climate-hfcs-reduction/regulatory-actions-technology-transitions>



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## Revised Restrictions on HFCs for Commercial Refrigeration, Proposed

Equipment Subsector	Original Technology Transitions Rule		Proposed Amendments to Technology Transitions Rule			
	GWP Limit	Installation Compliance Date	GWP Limit	Installation Compliance Date	GWP Limit	Installation Compliance Date
Cold storage systems with refrigerant charge $\geq$ 200 lbs	150	1/1/2026	700	1/1/2026	150	1/1/2032
Cold storage systems with refrigerant charge < 200 lbs	300	1/1/2026	700	1/1/2026	300	1/1/2032
Retail food refrigeration – remote condensing units with refrigerant charge $\geq$ 200 lbs	150	1/1/2026	1,400	1/1/2026	150	1/1/2032
Retail food refrigeration – remote condensing units with refrigerant charge < 200 lbs	300	1/1/2026	1,400	1/1/2026	300	1/1/2032
Retail food – supermarket systems with refrigerant charge $\geq$ 200 lbs	150	1/1/2027	1,400	1/1/2027	150	1/1/2032
Retail food – supermarket systems with refrigerant charge < 200 lbs	300	1/1/2027	1,400	1/1/2027	300	1/1/2032

**Note: Revisions are not effective until 30 days after EPA publishes a final rule.**