



Shaping Tomorrow's Global
Built Environment Today

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February 28, 2025

The Honorable Michael Johnson
Speaker
U.S. House of Representatives
Washington, DC 20515

The Honorable John Thune
Majority Leader
U.S. Senate
Washington, DC 20510

The Honorable Hakeem Jeffries
Democratic Leader
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Charles Schumer
Minority Leader
U.S. Senate
Washington, D.C. 20510

Dear Speaker Johnson, Majority Leader Thune, Minority Leader Schumer, and Leader Jeffries:

On behalf of ASHRAE, we would like to express our opposition to House Joint Resolution 30 (H.J. Res. 30) and Senate Joint Resolution 14 (S.J. Res. 14), which would overturn a rule that would enhance the management, recycling and reuse of certain refrigerants authorized by the American Innovation and Manufacturing Act of 2020 (AIM Act).

ASHRAE, founded in 1894, is a professional and technical society of more than 55,000 members that focus on building systems, energy efficiency, indoor air quality, refrigeration and resiliency within the industry. Through our Society's research, standards writing, publishing, certification and continuing education, ASHRAE shapes tomorrow's global built environment today.

The AIM Act, which enjoys strong bipartisan support, authorized EPA to phase down the production and consumption of hydrofluorocarbons (HFCs) by 85 percent in a stepwise manner by 2036 through an allowance allocation and trading program. The legislation provides critical support for the HVACR sector, which employs 1.3 million people in the U.S., as the industry advances into next generation refrigerant technologies.

The HFC management rule establishes an Emissions Reduction and Reclamation Program that includes several provisions such as leak repair and monitoring for new and existing appliances, and a standard for reclaimed HFC refrigerants. This framework provides regulatory, and market certainty needed to ensure an orderly transition to next-generation refrigerants. Billions of dollars have already been invested in research and development to create and safely handle new and innovative refrigeration products and equipment. Additionally, the international market for refrigeration and air conditioning is growing rapidly, and an orderly phase down of HFCs including through proper refrigerant management, recycling and reuse, is essential to ensure that next generation products and equipment can be brought to market. Overturning this rule would lead to significant market and regulatory uncertainty, undermining American companies and raising costs for HVACR industry and consequently the American people.

Finally, using the Congressional Review Act on this rule would prevent the agency from promulgating a similar rule. This would leave the industry without a federal standard, leading to a patchwork of state laws, creating market uncertainty.

Thank you for considering our comments and we strongly urge you to block this legislation as this rule enjoys widespread support from the industry and was created with significant public comment. If you have any questions or need additional information, please do not hesitate to contact either of us or have your staff contact GovAffairs@ashrae.org.

Sincerely,



M. Dennis Knight
2024-2025 ASHRAE President



Jeff H. Littleton
Executive Vice President