



# AIM Act Ruling: What it Means for INDUSTRIAL Customers

## What is the AIM Act?

The American Innovation and Manufacturing Act (AIM Act), passed in 2020 directs the U.S. Environmental Protection Agency (EPA) to oversee the phasedown of hydro-fluorocarbon (HFC) refrigerant production and consumption and transition to alternative refrigerants. It includes a phasedown schedule that began in 2022 and continues to 2036. The EPA announced its final ruling on the Technology Transition Rule in October, affecting several industries.

### The new rule

- Sets a maximum Global Warming Potential (GWP) limit on HFCs or HFC blends that can be used
- Prohibits the manufacture and import of products that use higher GWP refrigerants
- Prohibits the sale, distribution, and export of these products 3 years after the manufacture and import restriction
- Prohibits the installation of new systems that use higher-GWP HFCs

### What we know

- A **product** is defined as a functional assembly upon leaving a factory
- A **system** is defined as an assemblage of separate components that typically are connected and charged in the field with a regulated substance or substitute to perform a function or task
- EPA will allow the **repair** of appliances unless the repair results in a new system
- Automatic leak detection will be required on certain new and existing equipment

## Benefits Estimated by the EPA

**Emission Reduction** **876 Million**  
metric tons of CO<sub>2</sub>

**Climate change mitigation benefits** **\$50.4 Billion**

**Cost Savings to Consumers & Businesses** **\$4.5 Billion**

## How does this affect you?

Your current manufacturer, distributor, or installer will not be able to import, export, or sell you HFC refrigeration systems by the compliance date of your applicable sub sector. For example, cold storage warehouses not be able to buy equipment with R-404A or R-448A.

Allowable low-GWP refrigerants include CO<sub>2</sub>, A2L, Ammonia, and Propane.



Read more on the EPA website

Subsector	Compliance Date <sup>1</sup>	Products	GWP Limit
Ice Rinks	01/01/25	Ice Rinks	700
Chillers as a stand-alone product	01/01/26	Industrial process refrigeration with exiting fluid equal to or above -22°F	700
Industrial Process Refrigeration not using chillers	01/01/26	High temperature side of cascade system and temperature of the refrigerant entering the evaporator equal to or above -22 °F	300
	01/01/26	With less than 200 lb refrigerant charge and temperature of the refrigerant entering the evaporator equal to or above -22 °F	300
	01/01/26	With 200 or more lb refrigerant charge excluding high temperature side of cascade system and temperature of the refrigerant entering the evaporator equal to or above -22 °F	150
Cold Storage Warehouses	01/01/28	With refrigerant entering the evaporator equal to or above -58 °F and less than -22 °F	700
	01/01/26	With 200 or more lb refrigerant charge, excluding high temperature side of cascade system	150
	01/01/26	With less than 200 lb refrigerant charge	300
	01/01/26	High temperature side of cascade system	300
Data Centers	01/01/27	Data centers, computer room air conditioning, and information technology equipment cooling	700

<sup>1</sup> Systems must be installed and operational to compliance starting on the listed date. Products are available for sale, distribution and export 3 years after the listed date.

## Service of Legacy Systems

This rule does not restrict customers from using their existing refrigeration systems. The EPA has allowed for an existing system to continue its operation to the end of their useful life. The systems may be serviced and repaired throughout their use, including replacing components.

The following actions are considered a new installation:

- Assembling a system for the first time from used or new components
- Increasing the cooling capacity, in BTU per hour, of an existing system
- Replacing 75 percent or more of evaporators (by number) **and** 100 percent of the compressor racks, condensers, and connected evaporator loads of an existing system



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