



**PLUMBING-HEATING-COOLING
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Office of Air and Radiation
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Phasedown of Hydrofluorocarbons: Reconsideration of Certain Regulatory Requirements
Promulgated Under the Technology Transitions Provisions of the American Innovation and
Manufacturing Act of 2020

Docket ID No. EPA-HQ-OAR-2025- 0005

The Plumbing-Heating-Cooling Contractors—National Association (PHCC) is the oldest construction trades association in the country representing approximately 3,200 plumbing and HVACR contractors employing over 64,000 professionals across the United States. Since 1883, this organization and its members have focused on the safe installation and maintenance of plumbing and HVAC systems.

PHCC contractors are typically the primary point of contact with the consumer faced with unexpected HVAC issues. These consumers are often faced with the realities of forced product changes in the marketplace. This Association appreciates the opportunity to provide comments to EPA on the reconsideration of the Technology Transition Rule (TT Rule) and offers the following observations for consideration.

GENERAL

PHCC has been supportive of the process which has worked to transform the HVAC industry and promote the next generation of refrigerants. This Association has worked with other stakeholders for more than 6 years in planning for an orderly transition to the newer A2L refrigerants. This industry has planned for this transition; it is important to keep on track and maintain schedules as planned to provide certainty in the market.

Admittedly, at the beginning, there was skepticism about these products but as time and research progressed, it became clear that A2L products offer many benefits, have safe applications, and offer value to consumers. Ultimately, many contractors became early adopters, so much so that the demand for A2L products greatly outpaced the expected demand. To an extent, doing the right thing exacerbated the supply side issues of 2025.

REFRIGERANT SUPPLY ISSUES

There is no denying that the availability of refrigerants, particularly R-454B, in service-tech sized cylinders was a pain point for many contractors this year. There are a number of reasons which have been widely discussed which, when those reasons are combined, explain much of the distribution issue.

It is not this Association's intent to lay blame on any particular supply segment for this, rather PHCC acknowledges the incredible work by all stakeholders to find solutions and alleviate the pain many contractors and consumers felt. Cylinder production has ramped up, manufacturers stepped-up to increase pre-charge levels for longer line-sets, additional refrigerant production capacity has come on line, and manufacturers found creative ways to down-pack from bulk refrigerant inventories.

As it is now late fall, or maybe early winter, market demand will moderate and allow some time to recover. Moving into 2026, PHCC believes the A2L market issues will be greatly improved. Both price and availability should stabilize. There could be some spot market issues here and there, or demand could peak should the summer be abnormally hot but there was much learned last year to inform the future. At this time, PHCC believes no intervention is needed in the A2L market.

SELL THROUGH PERIOD

As the TT Rule was developed, there was much discussion regarding sell-through of HFC systems manufactured prior to the cut-off date. At one point, it was suggested that there would be no sell-through period for previously compliant systems, an idea emphatically opposed to by the industry. In the end, a one-year sell-through was included in the rule but that has turned out to be inadequate. However, PHCC does not believe compliant equipment should go bad based on the calendar.

The distribution chain, including contractors, had to predict how much equipment would be sold in 2024. Additionally, the production of new TT Rule compliant products had to ramp up and be in position to take over the market. This issue is tricky, how much does a vendor order, how much does a manufacturer make, and how much room is in the warehouse to hold it all? No one built transition warehouses for this so inventory management became critical yet unpredictable. As often is the case, the many factors add up to compound an issue.

Add to this the fact that many contractors elected to convert to A2L products early in 2025 and the result is a low demand for HFC products that are in the warehouse and a high demand for A2L products just coming off the trucks. When A2L equipment was not available many contractors decided to wait for inventory, possibly make repairs to existing equipment, or as a last resort use HFC equipment.

Some vendors had more HFC sales, some less; initial reports were promising for selling down inventory. It now appears that many wholesalers have HFC inventory left, some in the millions of dollars of inventory.



PHCC supports the removal of the sell-through period termination date. As long as the systems were manufactured or imported prior to January 1, 2025 those systems should be a viable option for consumers. It makes no sense to scrap the investment in perfectly good high efficiency products.

SUMMARY

PHCC has worked with many stakeholders over the course of the last several years planning and preparing for the TT Rule. The industry has invested significant time and resources to ensure an orderly transition. Transitions of this magnitude will encounter some unexpected situations, and this is no different. The industry has worked diligently to overcome obstacles; keeping on schedule will help ensure there are HFC supplies for servicing legacy installations. PHCC also believes that the cost of stranded inventory will be burdensome to the supply chain, a burden borne by consumers; eliminating the termination of the sell-through period is a positive step toward affordable air conditioning products.

PHCC again thanks EPA for the opportunity to comment on this reconsideration and looks forward to future discussions on practical and affordable energy policies.

Respectfully submitted,

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