



Proposed Changes to GWP Rule under AIM

EPA Releases Details of Proposed Technology Transitions Rule Changes

On September 30th, 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:

- **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.**
- 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).
- 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.

If approved, this proposal will not alter Air Management Supply's policy regarding the return of R-410A equipment. We are closely monitoring the situation and will keep you updated on any future developments.

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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: [CLICK HERE](#)



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