

PROPOSED EPA REGULATIONS ON HFCs

UPDATE, Sept. 30, 2025: EPA's Proposed Reconsideration of the Technology Transition Rule



Previously, in October 2023, and under authority from the AIM Act, EPA published a rule setting Global Warming Potential (GWP) limits for HFC refrigerants used in new refrigeration systems. Now, the Agency is proposing to modify the current version of the Technology Transition rule for refrigeration, air-conditioning, and heat pump products and equipment. EPA's proposal for this reconsideration of the Technology Transition rule was signed on Sept. 30, 2025. The proposed GWP limits and

dates for commercial refrigeration applications are shown in the table† below. The proposed rule would set interim GWP limits for remote condensing unit and supermarket systems of 1,400 starting in 2026 and 2027, respectively. It would also set an interim GWP limit for cold storage warehouses of 700 starting in 2026. Each of these subsectors would then have GWP limits of 150 or 300 (depending on charge size & configuration) starting in 2032. This is only a proposal and the dates and/or GWP limits could change in the final published rule.

Subsector†	Current Rule	Proposed Changes
Retail food refrigeration – remote condensing units with refrigerant charge of 200 pounds or greater	Starting January 1, 2026: GWP limit: 150	Starting January 1, 2026: GWP limit: 1,400 Starting January 1, 2032: GWP limit: 150
Retail food refrigeration – remote condensing units with refrigerant charge of less than 200 pounds or on the high side of a cascade system	Starting January 1, 2026: GWP limit: 300	Starting January 1, 2026: GWP limit: 1,400 Starting January 1, 2032: GWP limit: 300
Retail food refrigeration – supermarket systems with refrigerant charge of 200 pounds or greater	Starting January 1, 2027: GWP limit: 150	Starting January 1, 2027: GWP limit: 1,400 Starting January 1, 2032: GWP limit: 150
Retail food refrigeration – supermarket systems with refrigerant charge of less than 200 pounds or on the high side of a cascade system	Starting January 1, 2027: GWP limit: 300	Starting January 1, 2027: GWP limit: 1,400 Starting January 1, 2032: GWP limit: 300
Cold storage warehouse systems with refrigerant charge of 200 pounds or greater	Starting January 1, 2026: GWP limit: 150	Starting January 1, 2026: GWP limit: 700 Starting January 1, 2032: GWP limit: 150
Cold storage warehouse systems with refrigerant charge of less than 200 pounds or on the high side of a cascade system	Starting January 1, 2026: GWP limit: 300	Starting January 1, 2026: GWP limit: 700 Starting January 1, 2032: GWP limit: 300

EPA Requesting Feedback on:

- Compliance dates
- Data regarding which refrigerants are being considered or adopted in new refrigeration equipment for remote condensing units, supermarket systems, and cold storage warehouses
- Data about the commercial availability and timeline for adoption of new refrigeration equipment using lower-GWP substitutes
- Data about costs and savings resulting from the extension of compliance timelines for manufacturers and servicing companies

Comment Deadline to EPA is November 17th Comments can be submitted here:

<https://www.regulations.gov/docket/EPA-HQ-OAR-2025-0005>

EPA will also hold a virtual public meeting on October 20th.

EPA will try to finalize this rule by December 31, 2025.

† This table does not contain all sectors within the proposal. Please review the proposed rule to see how it will affect your entire operation. The proposed rule can be found here: <https://www.govinfo.gov/content/pkg/FR-2025-10-03/pdf/2025-19438.pdf>

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