

Fact Sheet

American Innovation and Manufacturing Act: Reclamation Requirements for Hydrofluorocarbon Refrigerants

Background

The American Innovation and Manufacturing (AIM) Act enacted on December 27, 2020, authorizes the U.S. Environmental Protection Agency (EPA) to address hydrofluorocarbons (HFCs) in three main ways:

- (1) Phasing down HFC production and consumption through an allowance allocation program;
- (2) Maximizing reclaiming and minimizing releases of HFCs from equipment and ensuring the safety of technicians and consumers; and
- (3) Facilitating the transition to next-generation technologies by restricting the use of HFCs in the sector or subsectors in which they are used. This fact sheet concerns the second area – maximizing reclamation and minimizing releases of HFCs.

In this fact sheet, EPA is providing information on the reclamation requirements established under the 2024 Emissions Reduction and Reclamation (ER&R) final rule published on October 11, 2024 ([89 FR 82682](#)). The rule establishes regulatory requirements to minimize the release of HFCs and certain substitutes from equipment (*e.g.*, air conditioning and refrigeration appliances) and to maximize the amount of HFCs reclaimed. The rule also requires two-time reclamation reporting to support a data driven evaluation of the supply of reclaimed refrigerants ahead of the 2029 servicing requirement for certain subsectors.

EPA publishes information on refrigerant reclamation:

- [Reclamation Report](#)
- [Refrigerant Reclamation Data and Trends](#)

Summary of Reclamation Provisions¹

Prohibition

The rule prohibits the sale, distribution, or transfer to a new owner of any HFC used as a refrigerant in stationary refrigerant-containing equipment that contains any recovered HFC(s), unless they were:

- (1) Reclaimed by an EPA-certified reclaimer to the applicable standard; or
- (2) Sold, distributed, or transferred to a new owner solely for the purposes of being reclaimed or destroyed.²

Reclamation Standard

Beginning January 1, 2026, no person may sell, identify, or report refrigerant as being reclaimed for use in the installation, servicing, or repair of refrigerant-containing equipment if the HFC component of the refrigerant contains more than 15 percent, by weight, of virgin HFCs. “Virgin” means newly produced. The final rule also includes certain recordkeeping and labeling requirements.³

¹ This information is provided for informational purposes only and should not be relied on for compliance.

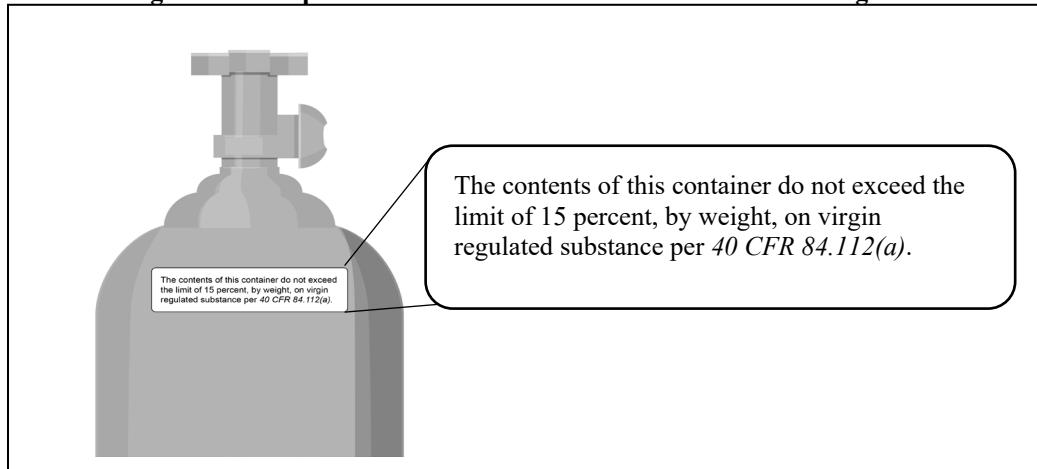
² Refer to [40 CFR 84.104](#) for complete requirements related to the prohibitions.

³ Refer to [40 CFR 84.112\(a\)](#) for the reclamation standard; [40 CFR 84.112\(c\)](#) for labeling requirements; and [40 CFR 84.112\(d\)](#) for recordkeeping requirements.

Labeling

Beginning January 1, 2026, reclaimers certified by EPA under 40 CFR 82.164 must affix a label⁴ to any container they fill that is being sold, distributed, or offered for sale or distribution and that contains reclaimed HFCs. This label certifies that the contents do not exceed 15 percent, by weight, of virgin HFCs and must meet the requirements at [40 CFR 84.112\(c\)](#). Figure 1 provides an illustrative example of a label on a container of reclaimed HFC refrigerant.

Figure 1. Example Label for Container of Reclaimed HFC Refrigerant



Servicing and/or Repair with Reclaimed HFCs

Beginning January 1, 2029, servicing and/or repair of refrigerant-containing equipment that contains an HFC in the supermarket systems, refrigerated transport, and automatic commercial ice makers subsectors must be done with reclaimed refrigerant that meets certain requirements. Refer to [40 CFR 84.112\(e\)](#) for complete requirements.

Recordkeeping

Beginning January 1, 2026, reclaimers certified under [40 CFR 82.164](#) must keep a record and certify that the reclaimed HFC(s) used to fill a container that will be sold or distributed, or offered for sale or distribution do not exceed 15 percent, by weight, of virgin regulated substances. The records must meet the requirements at [40 CFR 84.112\(d\)](#), including that they be kept for three years.

Such records include:

- The name, address, and other contact information for the EPA-certified reclaimer;
- Certification that the contents of the container are from a batch that does not exceed 15 percent, by weight, virgin HFCs;
- The percent of virgin HFCs of the batch used to fill container(s); and
- The date the container was filled with reclaimed HFC(s), the amount filled, the serial associated with the container(s) filled with the batch, and identification of the batch used to fill the container(s).

⁴ Reclaimers may alter current labels used on containers of reclaimed HFC refrigerants to meet the requirements at [40 CFR 84.112\(c\)](#).

Reporting

The reporting requirements in [40 CFR 84.112\(f\)](#) apply to reclaimers, distributors, and wholesalers of reclaimed refrigerants that:

- Contain an HFC; and
- Are sold or distributed for the intended purpose of servicing and/or repair of refrigerant-containing equipment in the supermarket systems, refrigerated transport, and automatic commercial ice makers subsectors.

Covered reclaimers, distributors, and wholesalers must submit two annual reports by the following deadlines:

- February 14, 2027, covering activity from January 1 through December 31, 2026; and
- February 14, 2028, covering activity from January 1 through December 31, 2027.

These reports must contain the information specified in [40 CFR 84.112\(f\)\(1\)](#) and [40 CFR 84.112\(f\)\(2\)](#), respectively, including:

- The quantity of reclaimed refrigerant containing HFCs, broken down by the name and mass of reclaimed HFCs; and
- The specific subsector where the reclaimed refrigerants are sold or distributed.



Additional Resources

Managing Use and Reuse of HFCs and Their Substitutes:

www.epa.gov/climate-hfcs-reduction/managing-use-and-reuse-hfcs-and-substitutes

EPA-Certified Reclaimers:

www.epa.gov/section608/epa-certified-refrigerant-reclaimers

ER&R Fact Sheets and Additional Resources:

www.epa.gov/climate-hfcs-reduction/resources-managing-hfc-use-and-reuse

Contact EPA: HFCEmissionsReductions@epa.gov