



Completing the HFC Application-Specific Allowance Holder Biannual Report

HFC Allocation Program Reporting Instructions

July 2026

INTRODUCTION

This document describes each data element in the HFC Application-Specific Allowance Holder Biannual Report and provides step-by-step instructions for completing the form. To submit the report through e-GGRT, you must first be registered with the HFC & ODS Allowance Tracking System (HAWK) module within e-GGRT. Refer to EPA's reporting instructions on [Registration and Account Management](#) for more information on the registration process. If you have any questions about how to fill out your report, please email HFCAllocation@epa.gov. The remainder of this document is organized as follows:

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REPORTING SCHEDULE

The HFC Application-Specific Allowance Holder Biannual Report is due twice per year. The first report covering January 1 – June 30 is due July 31, and the second report covering July 1 – December 31 is due January 31 of the following year.

Reporting Period Covered	Due Date	Form Application and Requirements
January 1 – June 30	July 31st	• Current application-specific allowance holders and entities requesting application-specific allowances for the first time can request allowances for the next calendar year through this report. • Sections 1 – 10 must be completed.
July 1 – December 31	January 31st	• Sections 1 – 4 must be completed.

TAB #1: INSTRUCTIONS

Review worksheet instructions in Tab #1 prior to completing the form.

TAB #2: COMPANY INFORMATION

Tab #2 must be completed when submitting the HFC Application-Specific Allowance Holder Biannual Report due July 31 and January 31.

Section 1 – Company Identification

Who must complete: All application-specific allowance holders **and** entities requesting application-specific allowances for the first time.

The following information must be provided:

- **Company Name:** The name under which your company is registered in HAWK.
- **Company ID:** The ID assigned to your company in HAWK (e.g., AIM001). If you do not have an ID in HAWK, please contact EPA at HFCAllocation@epa.gov.
- **Reporting Year:** The year for which you are reporting data.
- **Reporting Period:** The 6-month period for which you are reporting data.
- **Activity Questions:** Answers to these questions determine the sections you must complete. If a section is blacked out, do not fill it out.

Section 2 – Application-Specific Data

Who must complete: All application-specific allowance holders **and** entities requesting application-specific allowances for the first time.

The following information must be provided:

- **Quantity Acquired through Conferring Allowances:** The amount of each regulated HFC your company acquired, in kilograms, through the conferral of allowances, from an importer, producer, or supplier during the 6-month reporting period. Note that for this category, you are providing the quantity of HFCs you received that were directly the result of your conferred allowances and were imported or produced by another entity.
- **Quantity of HFCs your Company Imported Expending your Allowances:** The amount of each regulated HFC, in kilograms, your company [imported directly](#) during the 6-month reporting period by expending your allowances. (Note: If you imported HFCs, you must also report this activity to EPA using the HFC Importer Quarterly Report.)
- **Quantity of HFCs Purchased for Application-Specific Use without Expending or Conferring your Allowances:** The amount of each regulated HFC your company purchased, in kilograms, during the 6-month reporting period without expending or conferring your allowances (i.e., from the open market). Buying HFCs on the open market means that you did not have to expend or confer allowances to obtain the HFCs as they may have: (1) been imported or produced with the supplier's allowances after January 1, 2022; (2) been imported or produced prior to 2022; or (3) were reclaimed/recycled.
- **Quantity Held in Inventory by the Reporting Company or Held under Contract by Another Company for the Reporting Company's Use:** The amount of each regulated HFC, in kilograms, held on the last day of the previous 6-month period (i.e., December 31 or June 30) in inventory in the United States by your company or held under contract by another company for your use. If there is an increase in inventory from the previous reporting period, the increase should not exceed the quantity of acquired HFCs as reported in the three previous fields. Exclude the quantity of regulated HFCs stockpiled as a result of allowances allocated for the buildup of a stockpile in the event of a production cessation (i.e., under [§84.13\(b\)\(1\)\(iv\)](#)).
- **Quantity Sold, Returned, or Conveyed, Excluding Heels:** The amount of each regulated HFC, in kilograms, your company sold, returned, or otherwise conveyed to another entity during the 6-month reporting period, excluding heels as defined in [§84.3](#).
- **Quantity Destroyed:** The amount of each regulated HFC, in kilograms, your company [destroyed](#) during the 6-month reporting period.
- **Quantity Recycled:** The amount of each regulated HFC, in kilograms, your company recycled during the 6-month reporting period.

Please ensure that the date used for reporting quantities acquired aligns with the date that this material is reported as held in inventory. For example, if your company reports quantities acquired based on the date when the material is received on-site, please use the same date to report when the material is held in inventory. This alignment helps avoid discrepancies in which a company appears to have grown inventory without acquiring HFCs.



Supporting documentation is required for the quantities of HFCs acquired. Examples of supporting documentation include invoices, purchase orders, or shipping documentation. Please ensure you are using the same supporting documentation and dates for the quantities of HFCs acquired year-to-year.



Supporting documentation is required for quantities of HFCs held in inventory. Examples of supporting documentation include a spreadsheet or screenshot of this quantity from your

company's tracking system or a document that certifies that this quantity is correct, as well as a description of how this quantity is calculated.



Supporting documentation is required for quantities of HFCs sold, returned, or otherwise conveyed to another entity, excluding heels as defined in [§84.3](#). Examples of supporting documentation include invoices or shipping documentation.

Section 3 – Allowance Conferral Data

Who must complete: Any entity that acquired HFCs through the conferral of allowances during the 6-month reporting period.

For each company to which allowances were conferred, provide:

- A contact name, email, and phone number.
- The name and amount in kilograms of each regulated HFC received.

Some companies may confer allowances in a different reporting period than which they received HFCs from those conferred allowances. However, if material is reported as “Acquired through Conferring Allowances” in Section 2, that amount for each HFC acquired should equal the total of all “Quantity of HFC Received” in Section 3.

Section 4 – Stockpiling Unique Circumstance Data

Who must complete: Any entity that was allocated allowances for the buildup of a stockpile in the event of a production cessation (i.e., for the unique circumstance defined at [§84.13\(b\)\(1\)\(iv\)](#)).

The following information must be provided:

- **Quantity of HFCs Purchased with the Intent to Build Inventory:** The amount of each regulated HFC, in kilograms, your company purchased with the intent to build inventory during the 6-month reporting period.
- **Quantity of Stockpiled HFCs Held in Inventory:** The amount of each stockpiled regulated HFC, in kilograms, acquired pursuant to [§84.13\(b\)\(1\)\(iv\)](#) and held on the last day of the previous 6-month period (i.e., December 31 or June 30) in inventory.



Supporting documentation is required for quantities of HFCs purchased with the intent to build inventory. Examples of supporting documentation include invoices, purchase orders, or shipping documentation. Please ensure you are using the same supporting documentation and dates for the quantities of HFCs acquired year-to-year.



Supporting documentation is required for quantities of stockpiled HFCs held in inventory. Examples of supporting documentation include a spreadsheet or screenshot of this quantity from your company's tracking system or a document that certifies that this quantity is correct, as well as a description of how this quantity is calculated.

TAB #3: NEXT YEAR ALLOWANCES

Only complete Tab #3 when submitting the HFC Application-Specific Allowance Holder Biannual Report due July 31. Do not complete the sections in this tab in the report due January 31.

Section 5 – Transition Plan

Who must complete: All application-specific allowance holders **and** entities requesting application-specific allowances for the first time.

Describe plans to transition the regulated HFCs currently used in the specified application to those with a lower exchange value or to alternatives to regulated HFCs. This information may include the following:

- Alternatives actively being tested or that have been tested.
- The results of these trials.
- Plans to test alternatives in the future.
- Status of development, deployment, and/or commercialization of any alternatives that have been tested.
- Challenges or successes faced in the use or testing of alternatives.
- Use of reclaimed or recycled HFCs.

As information submitted under this report is required to be accurate and complete, please update this section yearly to reflect the most recent developments in your transition.

Section 6 – Unique Circumstances

Who must complete: Entities that are requesting allowances **in addition to** what the Agency will calculate based on HFC usage during the previous three years (as reported under Section 2 and Section 9). This is not your company's total request, which is to be completed in Section 7. You can use EPA's application-specific allowance allocation estimation tool [here](#) to estimate your company's base allocation based on historical usage and approximate the additional allowances you may require due to a unique circumstance to meet your company's total expected need. **Additional allowances may only be requested due to one of the following unique circumstances**, of which you can choose one or more:

- 1) Demonstrated manufacturing capacity coming online;
- 2) The acquisition of another domestic manufacturer or its manufacturing facility or facilities;
- 3) A global pandemic or other public health emergency, or other healthcare system needs related to increased patients diagnosed with medical conditions treated by metered dose inhalers (MDIs); or
- 4) Building up a stockpile of a specific regulated substance in the event of a production cessation.

To complete this section:

- Specify the applicable unique circumstance(s).
- Provide a projection of the **additional** quantity, in kilograms, of each regulated HFC needed for use in the specified application in the following calendar year.
- If you selected the unique circumstance "Building up a stockpile of a specific regulated substance in the event of a production cessation," specify the quantity you intend to purchase of each HFC, specify the year(s) of intended purchase, and provide a description of the stockpile plan.

- Provide a detailed explanation to justify the additional need for application-specific allowances for each applicable unique circumstance.
 - If you are submitting for the same unique circumstance that you have requested additional allowances for in previous years, please provide an update on progress and an explanation on why this unique circumstance is still relevant.
- **Submit documentation that supports this additional need.** Any supporting documents submitted to EPA will be treated as CBI. Supporting documentation should be verifiable and may include:
 - Copies of permits or other documents to clarify when the new line or facility is opening.
 - Agency communications and/or approval letters for new products or product modifications.
 - More recent sales numbers to document growth in MDI sales resulting from a public health emergency.
 - Purchase and sale agreements for facilities where a new product will be manufactured.
 - Recent invoices for equipment or capital tool purchases.
 - Securities and Exchange Commission filings documenting facility acquisitions or expansions.
 - Other: Please check with EPA if you have other forms of documentation in mind.
- Some forms of documentation may provide helpful context but are not sufficient to substantiate a unique circumstance request on their own. Examples of insufficient documentation include:
 - Projected demand numbers
 - Press releases
- More information on how to submit a unique circumstance can be found [here](#).



Cover Letter: To expedite the review process, EPA recommends including a cover letter with this report that specifies:

- An explanation about why the request for additional allowances due to a unique circumstance is being made.
- A description of the supporting documentation provided.

Section 7 – Total Expected HFC Purchases for the Next Calendar Year

Who must complete: All entities submitting the HFC Application-Specific Allowance Holder Biannual Report due July 31.

- Provide an estimate of the total quantity, in kilograms, of each HFC that your company expects to purchase next year. This should include any additional needs under a potential unique circumstances request as well as your base allocation, determined from your HFC usage over the past three years.

Section 8 – Contracting Information

Who must complete: (1) Entities who both hold application-specific allowances for MDIs or onboard aerospace fire suppression **and** (2) contract out the manufacturing of MDIs or pay another person to perform the servicing of onboard aerospace fire suppression. If you meet these criteria, provide the following information:

- The name and contact information for the manufacturing or servicing company(ies).
- Clarify whether the data provided in this report correspond to the application-specific allowance holder or to the contracting company(ies) described in this section.

Section 9 – Historical Purchase and Inventory Data

Who must complete: Entities that are requesting application-specific allowances for the first time (i.e., you are requesting application-specific allowances for the next calendar year).

The following information must be provided:

- **Quantity Acquired:** The amount of each regulated HFC your company acquired, in kilograms, in the previous three years in 6-month increments. Data for the most recent 6-month period will auto-populate based on information entered in Section 2.
- **Quantity Held in Inventory:** The amount of each regulated HFC, in kilograms, held in inventory as of June 30 of the prior year and June 30 of the current year. Data for the current year will auto-populate based on information entered in Section 2.



Supporting documentation is required for the quantities of HFCs acquired. Examples of supporting documentation include invoices, purchase orders, or shipping documentation. Please ensure you are using the same supporting documentation and dates for the quantities of HFCs acquired year-to-year.



Supporting documentation is required for quantities of HFCs held in inventory. Examples of supporting documentation include a spreadsheet or screenshot of this quantity from your company's tracking system or a document that certifies that this quantity is correct, as well as a description of how this quantity is calculated.

Section 10 – Application Information

Who must complete: Entities that are requesting application-specific allowances for the first time (i.e., you are requesting application-specific allowances for the next calendar year).

To complete this section:

- Select the appropriate application-specific use listed in [§84.13\(a\)](#).
- Provide a description of the use of regulated HFCs and a detailed explanation of how the use is the selected application-specific use.

PRE-SUBMISSION CHECKLIST

Use the checklist below to ensure completeness, accuracy, and consistency prior to report submission.

Report Completion	
All required report sections for the selected reporting period have been completed.	☐
The reported data covers the selected reporting period (Jan. 1 – June 30 or July 1 – Dec. 31).	☐
Required Supporting Documentation	
If your company acquired HFCs during the reporting period , documentation that supports those quantities acquired is attached (e.g., invoices, purchase orders, shipping records).	☐
If your company retains HFCs in inventory at the end of the reporting period , documentation that supports those quantities held in inventory is attached (e.g., inventory system records, spreadsheets, and/or certifications explaining how inventory was calculated).	☐
If your company sold, returned, or otherwise conveyed HFCs to another entity during the reporting period , documentation that supports those quantities is attached (e.g., invoices, shipping records).	☐
If allowances were allocated for building up a stockpile in the event of a production cessation , documentation that supports quantities acquired for this purpose during the reporting period is attached (e.g., invoices, purchase orders, shipping records).	☐
If your company retains stockpiled material as a result of allowances allocated for the buildup of a stockpile in the event of a production cessation , documentation that supports quantities of stockpiled HFCs held in inventory at the end of the reporting period is attached (e.g., inventory system records, spreadsheets, and/or certifications explaining how inventory was calculated).	☐
If your company is requesting additional allowances due to a unique circumstance , documentation that supports that additional need is attached.	☐
A cover letter that explains the report contents and any supporting documentation, including specific file attachment references, is attached. A cover letter is optional but is highly encouraged.	☐
All supporting documentation provides enough detail for EPA to independently verify reported HFCs, quantities, and dates (e.g., clear units of measure, cylinder sizes included, blend composition(s) included). Note: A letter stating purchase and inventory quantities, for example, without supporting documentation that can be used to independently verify reported quantities is <i>not</i> sufficient documentation.	☐
Consistency Checks	
Any increase in inventory from the previous reporting period does not exceed the quantity acquired during the current reporting period.	☐
If your company has a consignment setup with a supplier , quantities acquired and held in inventory are reported consistently (i.e., material reported in inventory is reported as acquired and vice versa) and in a manner consistent with previous reporting periods.	☐
A consistent date (e.g., purchase date or delivery date) is used for reporting quantities acquired from report to report and is also used as the basis for reporting quantities held in inventory.	☐
The basis for inventory reporting (e.g., cylinders in use and in storage) is consistent with previous reporting periods.	☐

The quantity of allowances conferred to suppliers during the reporting year is sufficient to cover the quantity of HFCs reported as acquired through conferring allowances.	☐
Quantities reported as acquired through conferral in Section 2 are equal to the total quantities reported in Section 3 OR the total quantities acquired reported in Section 2 are equal to the total quantities reported in Section 3.	☐
If the quantity of HFCs your company imported directly is greater than zero , your company has also submitted quarterly importer reports.	☐
Calculation Checks	
Calculations have been reviewed for accuracy.	☐
Data are reported in kilograms and use net HFC weights (not gross or container weights).	☐
The correct conversion factor (0.4536 kg/lb) was used where applicable.	☐
Rounding conventions are applied consistently.	☐

POST-SUBMISSION EPA REVIEW PROCESS

Once you have submitted your report, EPA may reach out with additional questions as the Agency reviews your information. The timeline for EPA to determine allowance allocations is limited, so ***timely reporting and responses to EPA's questions ensure your company can be considered for allowances.*** If EPA does not have sufficient documentation to verify your request, you may not receive allowances.

Examples of follow-up may involve EPA requesting:

- Additional information on any discrepancies between your reported data and documentation provided to support this data, such as quantity of HFCs acquired.
- Additional information on unique circumstances, such as timeframe or how the quantity of allowances requested is in addition to the allocation quantity EPA will calculate based on historical HFC usage data.
- Proper supporting documentation for unique circumstances, as outlined above in Section 6.

EPA will request this information through HAWK or by scheduling a meeting. Refer to EPA's reporting instructions on [Submitting HFC Reports](#) for more information on the resubmission process.