

April 16, 2025

The Honorable Lee Zeldin  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**VIA EMAIL**

***Re: Industry Support for the AIM Act as a Pillar of American Manufacturing Strength***

Dear Administrator Zeldin:

We write to reaffirm our strong support for the American Innovation and Manufacturing (AIM) Act of 2020. We the undersigned organizations support this administration's commitment to deregulatory action to provide pro-growth policies and regulatory certainty to the business community and manufacturers across the nation. We look forward to working with the you and the EPA to drive this work forward. Accordingly, the AIM Act provides a vital economic framework for the continued success of U.S. manufacturing, technological leadership, and global competitiveness in the heating, ventilation, air conditioning, and refrigeration (HVACR) and chemical sectors, and their respective value chains. We request your consideration of this important economic positioning for U.S. industry as you advance your regulatory right sizing agenda.

The AIM Act has proven to be a sound economic policy that supports more than \$132 billion in output, more than half a million American jobs across manufacturing, distribution, and technical services, over \$68 billion in GDP, more than \$38 billion in labor income, and roughly \$15 billion in federal, state, and local tax revenues combined.

The Act's predictable phasedown schedule for hydrofluorocarbons (HFCs) has enabled our industries to make timely investments in research, retooling, and workforce development, while enhancing certainty across supply chains and reducing long-term compliance burdens. This stability has been critical to avoiding the disruptions and cost escalations that a fragmented, state-by-state regulatory approach would have imposed.

Importantly, the AIM Act strengthens the competitive position of American manufacturers by securing a level playing field in global trade. Without it, our domestic industries would be at risk of being undercut by lower-cost foreign imports that do not meet the same technological, safety, or environmental standards. The AIM Act has helped ensure that American-made products continue to lead in key export markets—growing our share of the global HVACR and fluorochemical industries and supporting billions in domestic manufacturing output.

The law has also enhanced consumer protection and affordability. Through the orderly transition enabled by the AIM Act, consumers maintain access to affordable servicing options for existing equipment and benefit from the availability of modern systems that offer improved performance, longer lifespans, and lower total ownership costs. This outcome contrasts sharply with the potential efficiency trade-offs posed by certain alternative refrigerants, which some states might mandate as exclusive replacements in the absence of a coordinated federal framework under the AIM Act. Experience has shown that past refrigerant transitions, when executed under clear and consistent federal rules, have lowered costs over time through economies of scale and innovation-driven efficiency.

Our member companies—large and small—have already absorbed many of the necessary investments to align with the AIM Act. Reversing course or creating uncertainty at this stage would impose duplicative costs, disincentivize further domestic investment, and complicate logistics for thousands of U.S. manufacturers, distributors, and contractors.

We urge EPA to continue implementing the AIM Act in a manner that sustains the robust economic and technological benefits it has delivered to date. We stand ready to work with your team to ensure the continued success of this landmark legislation.

Thank you for your leadership and commitment to American industry.

Respectfully,

Air-Conditioning, Heating, and Refrigeration Institute (AHRI)  
Alliance for Responsible Atmospheric Policy  
American Chemistry Council  
National Association of Manufacturers  
U.S. Chamber of Commerce