



Fact Sheet: California's New Climate Legislation Tackling HFCs (S.B.1206)

In August, 2022, California passed **S.B.1206**, new climate legislation to reduce the emissions and use of hydrofluorocarbons (HFCs), potent synthetic greenhouse gases used primarily as refrigerants in cooling equipment. Introduced by Senator Nancy Skinner (D-Berkeley), S.B.1206 sets California on a path to transition out of most HFCs to ultra-low or no global warming potential (GWP) alternatives and reclaimed refrigerants by 2035.

Key elements include:

1. GWP Limits for Entry into Commerce of Bulk HFCs

S.B.1206 prohibits the sale, distribution or otherwise entering into commerce in the state, of bulk HFCs or HFC blends that exceed a specified GWP¹ threshold. Reclaimed refrigerants are exempt from this requirement and will still be available to service existing equipment. The maximum GWP limits for bulk HFCs are:

- <2,200 beginning January 1st, 2025
 - Includes R404A and R507 used in commercial refrigeration and supermarkets.
- <1,500 beginning January 1st, 2030
 - Includes R-410A, used in most air conditioners and heat pumps, and some HFC blends used in refrigeration such as R407A/C.
- <750 beginning January 1st, 2035
 - Includes many HFCs and HFC blends currently used to retrofit refrigeration equipment including R-448A/B, R449A/B, and R134a, which is also used in existing motor vehicle air conditioners.

2. Directs CARB to Undertake Additional Regulations

S.B.1206 directs the California Air Resources Board (CARB) to initiate a rulemaking requiring low or ultra-low GWP alternatives to HFCs in a sector “unless not practicable for entities in the sector to comply” with the requirement. The bill defines “low GWP” as less than 150 and “ultra-low GWP” as less than 10.

3. Requires State Facilities to Use Only Reclaimed HFCs

S.B.1206 mandates that HFCs with a GWP >750 that are not reclaimed shall not be used to replenish leaks or otherwise service stationary equipment owned or operated by the state. This means public office buildings, schools, and more will be required to purchase reclaimed instead of newly produced refrigerants to service existing refrigeration and air conditioning.

4. CARB Assessment on Transition to Ultra-low or No-GWP Alternatives

S.B.1206 instructs CARB to publish an assessment by January 1st, 2025 outlining strategies needed to transition the state's economy away from HFCs through adoption of ultra-low and no-GWP and maximizing recovery and reclamation, no later than 2035. The bill specifies that the assessment shall include:

- A list of existing incentives for reducing HFCs;
- Proposals for additional incentives, safety testing, and demonstration projects needed to aid in the transition to low, ultra-low, and no-GWP refrigerants and in increasing refrigerant recovery and reclamation;
- Suggested legislative or regulatory changes;
- Recommendations on any interim steps required to fully transition to ultra-low or no-GWP alternatives, including how to establish a robust reclamation system for hydrofluorocarbons with higher GWPs;
- An analysis by the State Energy and Resources Conservation Development Commission of issues preventing high levels of HFC reclamation;
- Workforce training and certification recommendations to grow the workforce of technicians capable of handling and servicing equipment using ultra-low and no-GWP alternatives.

S.B.1206 supplements previous HFC regulations finalized by CARB in 2021, which are not sufficient on their own, to meet California's climate goals to reduce HFCs by 40% below 2013 levels by 2030 and reach carbon neutrality.

The new legislation is expected to accelerate emission reductions in the installed base of existing cooling equipment using HFCs by encouraging faster retrofit and replacement with low-GWP alternatives and increasing demand for recovered and reclaimed refrigerants.

Additional Resources:

- The text of S.B.1206 is available [here](#).
- CARB's 2021 Final Regulation Order is available [here](#).
- CARB F-Gas Reduction Incentive Program (FRIP) website is [here](#).
- Information on the CARB Refrigerant Management Program (RMP) is [here](#).

1 The legislation defines GWP as the 100-yr GWP values published by the Intergovernmental Panel on Climate Change (IPCC) in its Fourth Assessment Report (AR4)