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March 23, 2026

The Honorable Josh Heintzeman  
Representative  
State Legislature  
Centennial Office Building  
2nd Floor  
St. Paul, Minnesota 55155

**RE: House File (HF) 4257 -- SUPPORT**

Dear Representative Josh Heintzeman:

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) respectfully submits this letter of support for HF 4257, which would delay the reporting deadline of products that contain perfluoroalkyl and polyfluoroalkyl substances (PFAS) to July 1, 2027, and exempt reporting for products designated as a Currently Unavoidable Use (CUU).

AHRI represents more than 330 manufacturers of heating, ventilation, air conditioning, refrigeration (HVACR) and water heating equipment. It is an internationally recognized advocate for the HVACR and water heating industry and certifies the performance of many of the products manufactured by its members. In North America, the annual economic activity resulting from the HVACR and water heating industry is more than \$211 billion. In the United States alone, AHRI member companies, along with distributors, contractors, and technicians employ more than 700,000 people. In Minnesota, the annual economic activity resulting from the HVACR and water heating industry is more than \$3.68 billion; and AHRI member companies, along with distributors, contractors, and technicians employ more than 12,000 people.

AHRI strongly supports the language in the legislation, as introduced, which designates cooling, heating, ventilation, air-conditioning, or refrigeration equipment and refrigerants as a CUU. AHRI members are transitioning to climate-friendly refrigerants under the American Innovation and Manufacturing (AIM) Act of 2020. Under the current definition of PFAS in Minnesota, many low-Global Warming Potential (GWP) refrigerants (A2Ls) used in HVACR and water heating systems are considered PFAS. Most low-GWP A2L refrigerants used in HVACR and water heating systems have low toxicity levels.<sup>1</sup> The EPA Significant New Alternatives Policy (SNAP) evaluates refrigerants based on exposure risks, toxicity, and environmental impact, and has determined that A2L refrigerants present minimal risk to humans and the environment.<sup>2</sup>

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<sup>1</sup> ANSI/ASHRAE Standard 34-2022.

<sup>2</sup> EPA Significant New Alternatives Policy- Criteria for Evaluating Alternatives, <https://www.epa.gov/snap/about-snap-review#criteria>. (Last accessed on February 28, 2025).

AHRI notes that Maine's 2024 amendments to its PFAS in Products law<sup>3</sup> included an indefinite exemption for SNAP-approved refrigerants used for servicing. AHRI urges the bill sponsor and the Members of the Environment and Natural Resources Finance and Policy Committee to support the introduced bill's CUU designations so Minnesotans maintain access to the newest generation of HVACR and water heating equipment.

Additionally, HVACR and water heating equipment are maintained and serviced by qualified professionals and the chemicals used in HVACR and water heating equipment and components are not generally accessed by the public. HF 4257's CUU designation aligns with states such as New Mexico and Maine's acknowledgement of the critical role that HVACR and water heating equipment play in modern society and the minimal risk this equipment and its components pose to public health.

AHRI also supports extending the reporting deadline to 2027. Even for industries with a strong grasp of their components' chemical composition, building and maintaining an accurate dataset of chemicals across the supply chain remains extremely challenging. This extension will provide the HVACR and water heating industry with additional time to survey their supply chains and improve their ability to comply with the regulations.

AHRI appreciates the goal of this legislation, as well as the opportunity to provide feedback.

Sincerely,

Hayley Davis  
Manager, State Government Affairs

cc: Members of the Environment and Natural Resources Finance and Policy Committee

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<sup>3</sup> LD 1537, 131st Legislature, effective August 9, 2024.