

General Guidelines on Enhanced Education Program for Small Containers of Automotive Refrigerants

Air Resources Board

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The Regulation for Small Containers of Automotive Refrigerant requires manufacturers of small containers of automotive refrigerant to implement a deposit and return program to process any remaining HFC-134a in the can. Additionally, retailers are to collect a refundable \$10 deposit, at the time of sale, from consumers for each small container of automotive refrigerant purchased. Consumers can reclaim their deposit by returning the used container with its receipt to the retailer within 90 days of purchase. The 2017 amendments clarify that if a consumer fails to collect the \$10 deposit, the retailer must transfer the unclaimed deposit to a manufacturer-managed account. The funds from this account are to be used primarily to reduce greenhouse gas (GHG) emissions through enhanced consumer education, and secondarily to support other programs, projects, or measures reducing GHG emissions. Further information about the regulation can be found here: <https://www.arb.ca.gov/cc/hfc-mac/hfcdiy/hfcdiy.htm>.

Originally, manufacturers were required to submit proposed Enhanced Education Programs as part of their small can certification applications. After the 2017 amendments to the regulation for small containers of automotive refrigerant became effective, the Enhanced Education Programs are now reviewed on a yearly basis and require prior approval by the Air Resources Board (ARB) before funds can be spent. In addition, manufacturers must also submit a separate report detailing how funds were spent during the previous year. These provisions can be found as follows:

Section § 95367(a)(6) provides that: “Each manufacturer is required to submit a proposed plan that details how it expects to expend unreturned container deposit funds collected during the previous calendar year on enhanced consumer education programs or other programs, projects, and measures reducing greenhouse gas emissions for approval by the [Air Resources Board] Executive Officer...”

Additionally, section 95366(b)(6) states that each manufacturer “must separately account for any funds attributable to unclaimed deposits or other programs, projects, and measures reducing greenhouse gas emissions that have been previously approved by the Executive Officer... The manufacturers or their designees are to provide to ARB an accounting of the collection and expenditures of these funds as described in section 95367(a)(5). ...”

These requirements mean that each manufacturer, or its designee, must submit two annual reports. One is the spending plan and the other is the spending report.

The spending plan describes anticipated expenditures of unclaimed consumer deposits for the Enhanced Education Programs, and other programs, projects, and measures reducing GHG emissions, and will be sent to the ARB Executive Officer for approval before implementation for the upcoming year.

The spending report will detail the exact expenditures of unclaimed consumer deposits for the Enhanced Education Programs, and other programs, projects, and measures reducing GHG emissions, for the previous year.

In consultation with stakeholders, the Enhanced Education Programs are agreed to focus on the following prioritized categories:

Category 1: Enhanced education programs to increase used can return rate

The enhanced education programs are aimed to reduce greenhouse gas emissions by increasing the return rate of used containers. They may include, but are not limited to:

- Additional education programs and effective measures to increase consumers' return of used containers of automotive refrigerants to retailers;
- Additional education programs that help retailers transfer ALL the returned containers to manufacturers or recycling centers;
- Expanded outreach and education programs to independent (mom-and-pop) stores on the return and recycling of used containers.

Category 2: Other program/project/measures that help to reduce GHG emissions from refrigerants

2.1 Program/project/measures on promotion and adoption of low-GWP (Global Warming Potential) refrigerants in automotive sector

These include, but are not limited to:

- Consumer education programs on the phasedown of high-GWP refrigerants, such as HFC-134a, and transition to low-GWP refrigerants, such as HFO-1234yf and R-744 (CO₂);
- Programs that help to resolve the technical, environmental, and safety issues when using low-GWP refrigerants in vehicle AC systems;
- Development of best practices for do-it-yourselfers to service vehicle AC systems with low-GWP refrigerants.

2.2 Program/project/measures on reduction of GHG emissions from refrigerants in other sectors

These include, but are not limited to:

- Measures that help to reduce the use of refrigerants in refrigeration and air conditioning systems;
- Measures that improve the leak-tightness of systems containing refrigerants;
- Programs that help to establish the technical protocols and safety standards of low-GWP alternatives of refrigerants currently in use;
- Projects that support the research and development of novel alternatives that have lower GWP.