

# Australia PFAS Ban and HVAC Transition Policy Proposal

## Policy Goal

Phase out PFAS across the HVAC value chain and accelerate adoption of PFAS-free, low-GWP natural refrigerants (CO<sub>2</sub>, hydrocarbons, ammonia) while ensuring safety and affordability.

## Context

Australia has already banned PFOS, PFOA, and PFHxS from July 2025 under IChEMS, and restricted import/manufacture of small multi-head split systems using high-GWP refrigerants. This proposal builds on those frameworks to achieve full PFAS elimination.

## Scope & Definitions

- 1 Class-based PFAS definition with hazard tiers.
- 2 Covers refrigerants, foams, coatings, seals, filters, and service chemicals.
- 3 Time-limited exemptions only for essential uses lacking alternatives (max 10 years).

## Policy Levers

- 1 Expand GWP-based bans to all HVAC categories by 2030.
- 2 Mandatory PFAS content declaration and PFAS-Free labeling.
- 3 Public procurement preference for PFAS-free systems from 2026.
- 4 Transition rebates and accelerated depreciation for compliant systems.
- 5 National training on safe installation of A2L/A3 refrigerants.
- 6 R&D; support for PFAS-free seals and materials.

## Implementation Timeline

- 1 2026: PFAS disclosure, labeling, and public procurement preference.
- 2 2027–2028: Ban intentionally added PFAS in residential/light-commercial HVAC.
- 3 2029–2031: Ban PFAS in commercial HVAC new installations.
- 4 2032–2035: Align with EU F-gas phase-out deadlines (monobloc by 2032, splits by 2035).

## Risks & Mitigation

- 1 Safety incidents with hydrocarbons — address via AS/NZS 5149 & 60335 compliance.
- 2 Cost spikes — offset with rebates and staged bans.
- 3 Essential-use gaps — reviewed every 2 years with sunset clauses.
- 4 Regrettable substitutions — class-based policy with transparency.
- 5 Legacy stock dumping — align import bans with EU F-gas schedules.

## Top 10 Government Actions (2025–2026)

- 1 Draft PFAS disclosure regulations for HVAC imports/sales.

- 2 Create national PFAS-Free HVAC label.
- 3 Publish phase-out schedule through 2035.
- 4 Expand GWP bans beyond current categories.
- 5 Fund installer upskilling on A2L/A3 systems.
- 6 Grant funding for PFAS-free component manufacturers.
- 7 Establish take-back guidance under PFAS NEMP.
- 8 Mandate PFAS-free procurement in government contracts.
- 9 Create an Essential Use Review Panel.
- 10 Launch a public PFAS-free HVAC dashboard tracking progress.

This proposal offers a practical, phased roadmap to make Australia a leader in PFAS-free, climate-safe air conditioning. It aligns with the EU's F-gas deadlines, builds on Australia's IChEMS framework, and protects public health, water, and the environment.