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March 26, 2025

To: The Subcommittee of Experts on the Transportation of Dangerous Goods

Re: Council on the Safe Transportation of Hazardous Articles (COSTHA) proposal "Flammable Gases in Non-Refillable Pressure Receptacles"

Dear Committee Members,

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) supports the 2025 proposal developed by the Council on the Safe Transportation of Hazardous Articles (COSTHA), titled "Flammable Gases in Non-Refillable Pressure Receptacles."

AHRI represents more than 330 manufacturers of air conditioning, heating, and refrigeration (HVACR) equipment. It is an internationally recognized advocate for the HVACR 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 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.

With the shift to low-Global Warming Potential (GWP) refrigerants, many of which have mild flammability, it is critical that regulations allow the transportation of cylinders containing these refrigerants. The UN Globally Harmonized System of Classification and Labelling of Chemicals (GHS) recognizes Category 1B flammables as having mild flammability compared to Category 1A flammables. These new low-GWP refrigerants, classified as A2L by ASHRAE 34 and ISO 817, meet the criteria of GHS Category 1B flammables.

AHRI recommends the Subcommittee of Experts on the Transportation of Dangerous Goods to approve this proposal to ensure that the HVACR industry can continue to ship products that provide essential services for human comfort and cold chain to customers around the world, as well as the cylinders and receptacles that are needed to supply refrigerants to these products.

Regards,

A handwritten signature in black ink, appearing to read "Thomas J. Deary". The signature is fluid and cursive.

Thomas J. Deary

Senior Director of Codes

The Air Conditioning, Heating, and Refrigeration Institute