

Labeling HCFC Products Starting 2015: What You Need to Know

Products imported or manufactured after January 1, 2015 that contain or were manufactured with an HCFC must bear a warning label before they can be introduced into interstate commerce. Imported products must be labeled before clearing U.S. Customs.



Regulatory basis for product labeling requirements

Product labeling is mandated by section 611 of the Clean Air Act. The full labeling requirements can be found in the Code of Federal Regulations at Title 40 Part 82 Subpart E (40 CFR 82.100–82.124).

Which products will likely be affected by the requirement?

The Clean Air Act greatly restricts the production and import of HCFCs, as well as their use in equipment and products. Because of these restrictions, the universe of products potentially subject to labeling requirements is narrow, and consists primarily of imported products.

What is an HCFC?

Hydrochlorofluorocarbons (HCFCs) are used globally in many applications—as refrigerants, foam blowing agents, fire suppression agents, sterilants, and solvents. These chemicals deplete the Earth's stratospheric ozone layer, which protects humans and the environment from harmful ultraviolet (UV) radiation.

Products that could contain HCFCs, and may still be imported:

Certain foam products, which could include: refrigerators; water heaters; vending machines; building/roof insulation; pipe wrap and other insulating foam products; boats or other equipment containing foam for buoyancy purposes; taxidermy manikins made of rigid polyurethane foam

Spray foam (specifically aerosolized polyurethane foam) sometimes referred to as insulating foam sealant

Certain imported aerosol, solvent, and adhesive products

Domestically manufactured products that contain HCFCs:

Portable fire extinguishers containing HCFC blends

Products that may still be manufactured with HCFCs in the U.S. or abroad:

Electronics, aerospace equipment, medical equipment, and critical infrastructure where the product was cleaned or lubricated with an HCFC solvent

What must the label say and where should it appear?

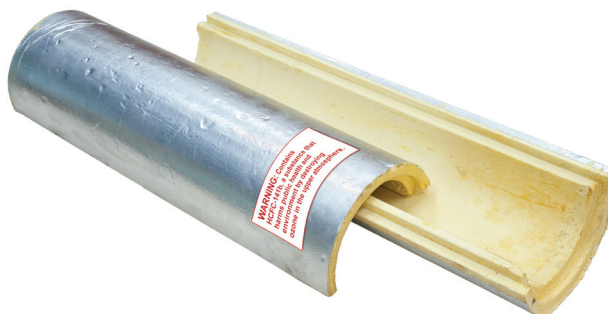
The purpose of the label is to allow consumers to make informed choices before buying products containing or manufactured with HCFCs. To that end, the warning statement must be clearly legible and conspicuous such that it is likely to be read by consumers prior to making their purchase. The label must include the following statement:

WARNING: [Contains / Manufactured with] [name of HCFC], a substance that harms public health and environment by destroying ozone in the upper atmosphere.

The warning may be printed directly on a product or its outer packaging or on an alternative label, including the following conspicuous placements:

- Principal display panel or display panel area
- Alternative labels, such as hang tags, stickers, or similar overlabeling
- Outer packaging
- Supplemental printed materials, such as invoices, bills of lading, or package inserts
- Promotional materials, such that the warning statement is visible before the time of purchase

Additional information on labeling placement and requirements can be found in the Code of Federal Regulations at Title 40 Part 82 Subpart E (40 CFR 82.108 and 82.110). The labeling regulations (40 CFR 82.100–82.124) also contain certain exemptions to the requirements, as well as requirements for when the label must accompany a product that is sold for use in manufacturing another product.



FOR MORE INFORMATION visit <http://www.epa.gov/ozone/title6/labeling/index.html>, or contact the ODS Hotline at 1-800-296-1996 or <http://www.epa.gov/ozone/comments.htm>.



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