

Alerta | Ambiental



Febrero 2026

Consumo máximo de hidroclorofluorocarbonos permitido en México para el periodo 2026 a 2030

El 23 de enero de 2026, la Secretaría de Medio Ambiente y Recursos Naturales (“SEMARNAT”) publicó en el Diario Oficial de la Federación (“DOF”) los volúmenes máximos de consumo permitido de hidroclorofluorocarbonos (“HCFC”) en México para el periodo 2026 a 2030, en el marco del Protocolo de Montreal relativo a las sustancias que agotan la capa de ozono (el “Protocolo”).

Los HCFC son gases ampliamente utilizados en distintas industrias como agentes refrigerantes y de limpieza. Sin embargo, estos dañan la capa de ozono y propician el calentamiento global, por lo que México suscribió el Protocolo en 1987, el cual busca eliminar totalmente su consumo para el 1 de enero de 2030, tomando como año base el 2013, según se presenta a continuación en toneladas métricas y en toneladas de potencial de agotamiento de ozono (“PAO”):

Sustancia	Consumo máximo permitido									
	2026		2027		2028		2029		2030	
	Ton. métricas	Ton. PAO	Ton. métricas	Ton. PAO	Ton. métricas	Ton. PAO	Ton. métricas	Ton. PAO	Ton. métricas	Ton. PAO
HCFC-22	3,798.10	208.90	3,465.45	190.60	2,461.81	135.4	2,238.18	123.1	0	0
HCFC-123	15.00	0.30	15.00	0.30	15.00	0.30	15.00	0.30	0	0
HCFC-124	0	0	0	0	0	0	0	0	0	0
HCFC-141b	0	0	0	0	0	0	0	0	0	0
HCFC-142b	0	0	0	0	0	0	0	0	0	0
Totales	3,813.18	209.20	3,480.45	190.9	2,476.81	135.5	2,253.18	123.4	0	0

Para garantizar el cumplimiento con los nuevos volúmenes máximos de consumo permitido de HCFC, la SEMARNAT únicamente autorizará la importación de HCFC-22 y HCFC123 cuando no se rebasen los límites de consumo establecidos en el Acuerdo.

El presente Acuerdo entró en vigor el 24 de enero de 2026.

Autores

- **Erick Hernández Gallego** | +52 55.5029.0060 | ehernandez@gtlaw.com
- **Luis Jorge Akle Arronte** | +52 55.5029.0061 | aklel@gtlaw.com
- **Paula De Uriarte González** | +52 55.5029.0000 | Paula.Deuriarte@gtlaw.com
- **Carolina Monroy Solís** ~ | Pasante | Ciudad de México

~ No admitido para ejercer Derecho

Abu Dhabi. Albany. Amsterdam. Atlanta. Austin. Berlin.~ Boston. Charlotte. Chicago. Dallas. Delaware. Denver. Fort Lauderdale. Houston. Kingdom of Saudi Arabia.« Las Vegas. London.* Long Island. Los Angeles. Mexico City.+ Miami. Milan.» Minneapolis. Munich. New Jersey. New York. Northern Virginia. Orange County. Orlando. Philadelphia. Phoenix. Portland. Sacramento. Salt Lake City. San Diego. San Francisco. Seoul.∞ Sao Paulo Shanghai. Silicon Valley. Singapore.° Tallahassee. Tampa. Tel Aviv.^ Tokyo.⌘ United Arab Emirates.< Warsaw.~ Washington, D.C.. West Palm Beach. Westchester County.

*This Greenberg Traurig Alert is issued for informational purposes only and is not intended to be construed or used as general legal advice nor as a solicitation of any type. Please contact the author(s) or your Greenberg Traurig contact if you have questions regarding the currency of this information. The hiring of a lawyer is an important decision. Before you decide, ask for written information about the lawyer's legal qualifications and experience. Greenberg Traurig is a service mark and trade name of Greenberg Traurig, LLP and Greenberg Traurig, P.A. ~Greenberg Traurig's Berlin office is operated by Greenberg Traurig Germany, an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. *Operates as a separate UK registered legal entity. «Greenberg Traurig operates in the Kingdom of Saudi Arabia through Greenberg Traurig Khalid Al-Thebity Law Firm, a professional limited liability company, licensed to practice law by the Ministry of Justice. +Greenberg Traurig's Mexico City office is operated by Greenberg Traurig, S.C., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. »Greenberg Traurig's Milan office is operated by Greenberg Traurig Santa Maria, an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. ∞Operates as Greenberg Traurig LLP Foreign Legal Consultant Office. °Greenberg Traurig's Singapore office is operated by Greenberg Traurig Singapore LLP which is licensed as a foreign law practice in Singapore. ^Greenberg Traurig's Tel Aviv office is a branch of Greenberg Traurig, P.A., Florida, USA. ⌘Greenberg Traurig's Tokyo Office is operated by GT Tokyo Horitsu Jimusho and Greenberg Traurig Gaikokuhojimubengoshi Jimusho, affiliates of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. <Greenberg Traurig's United Arab Emirates office is operated by Greenberg Traurig Limited. ~Greenberg Traurig's Warsaw office is operated by GREENBERG TRAURIG Nowakowska-Zimoch Wysokiński sp.k., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. Certain partners in GREENBERG TRAURIG Nowakowska-Zimoch Wysokiński sp.k. are also shareholders in Greenberg Traurig, P.A. Images in this advertisement do not depict Greenberg Traurig attorneys, clients, staff or facilities. No aspect of this advertisement has been approved by the Supreme Court of New Jersey. ©2026 Greenberg Traurig, LLP. All rights reserved.*