

Team member
Francesco ScuderiPhone
+32 (0)466 90 04 01Email
francesco.scuderi@eurovent.euDate
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Eurovent comments on the European Commission proposal for a revised F-Gas Regulation – 2022-0099(COD)

In a nutshell

With this paper Eurovent provides its position on the European Commission proposal for a revised F-Gas Regulation, in view of the ongoing public consultation.

Preamble

Eurovent supports the F-Gas Regulation and the climate and energy goals set under the European Green Deal to reduce greenhouse gas emissions by at least 55% by 2030 and to reach climate neutrality by 2050.

We welcome several important measures introduced in the new revision proposal, like those that increase the ambition through the fight against the illegal trade in refrigerants, better market control and support for professional training.

Eurovent believes that the ambitions of the F-Gas Regulation should support the EU's climate targets and the European Green Deal objectives. Energy efficiency improvements and the decarbonisation of heating and cooling are key to secure and facilitate the green transition. The recent geopolitical developments have led to the urgent need to reduce energy dependency and to accelerate the roll out of 30 million new heat pumps in Europe by 2030 (REPowerEU).

However, Eurovent is also concerned that the steep HFC quota phase down from 2024 onwards and the additional product bans in the Commission's proposal would slow down the uptake of heat pump technology in the market, significantly impacting its affordability and consequently maintaining fossil fuel appliances for a longer time in the market. The proposed severe quota reduction and the market reality of the heat pump technology will not allow to meet the goal of REPowerEU and the EU Green Deal decarbonisation targets set by 2030.

With this document we intend to highlight some areas in which the proposal for the revision of the regulation on fluorinated gases could be further improved.

HFC phase down (Annex VII)

The phase down proposal introduces a steep reduction in allowed HFCs on the market from 2024 onwards that would phase-out HFCs for new equipment in room air conditioning and heat pump sector from 2027 onwards.

The Ecodesign Regulations for air conditioners, heat pumps and other equipment using HFCs are also currently being revised to meet more stringent energy efficiency requirements and to comply with updated and new test methods. There are 27.764¹ models of heat pump on the market, therefore adapting to these requirements and simultaneously moving to HFC alternatives is too challenging within the proposed timeframe for the R&D resources of manufacturers. Furthermore, installers would have to be trained to use alternative refrigerants. Such scenario would impact the affordability and market uptake of heat pumps. It should be noted that the overall heat pump emissions (direct from refrigerant

¹ Eurovent Certita Certification 2022 Database, active models all types of heat pumps - Additional very exhaustive supporting data are available upon request (Eurovent Market Intelligence 2022 data)

and indirect from electricity consumption) are insignificant compared to the equipment using the fossil fuel.

The Metered Dose Inhalers (MDI) are proposed to be included in the scope and therefore possibly further reducing the available quota for the Air Conditioning and Heat Pump sectors and potentially slowing down the progress towards climate neutrality.

For these reasons, and to ensure that the climate and energy targets, as well as REPowerEU ambition can be achieved, Eurovent suggests maintaining the current phase down steps until at least 2030 and furthermore to consider the potential saving of HFCs quota coming from the stationary refrigeration sector that already switched towards low-GWP technologies.

Heat pumps product ban

Eurovent holds that to support the contribution of heat pump technology to the EU Climate ambitions there should be no additional product bans introduced for heat pumps.

Lack of definitions

The text on the proposed bans could benefit from clarification as it is unclear in scope and creates confusion and ambiguity, e.g., the terms 'self-contained' (Annex IV-11-12-16-17) and plug-in (Annex IV – 17-17) are not supported by a definition. It is difficult to assess what products are in scope, because there are no definitions for air conditioners and heat pumps. The reference to 'parts thereof' in Art. 11 seems to imply that the restriction of placing on the market also applies to parts of products and equipment, and thus would not allow for the repair and upgrading of existing equipment. This would undermine the EU's ambitions to improve durability and reparability.

Misalignment with Ecodesign measures and safety standards (Annex IV)

The Commission acknowledges that due to safety constraints some bans refer to an exemption 'except when required to meet safety standards'. Eurovent questions how Market Surveillance Authorities will handle these exemptions, which could put at risk the EU single market, and how the Commission will avoid the related possible loopholes – e.g. 'unless it can be established that it is not technically feasible or entails disproportionate costs'.

Some of the proposed bans do not consider the technological development of products covered by Ecodesign measures². The outcome of the review study for Room air conditioning appliances identified that for the niche market of for example **fixed double duct air conditioners** no alternative technologies are available.

Thus, Eurovent calls for an exemption of the bans for fixed double duct air conditioners.

Stationary Refrigeration Applications

Surprisingly the proposed bans do not reflect the status of the art of the stationary refrigeration application. The stationary refrigeration industry has already completely adapted its technologies and product portfolio to use refrigerants having GWP 1 and 3, universally guaranteeing a high level of efficiency even in the warmest climatic regions of Europe and without compromising on safety.

Therefore, we encourage the Commission to strengthen the ambition and promote the adoption of low GWP technologies for stationary refrigeration equipment of any cooling capacity/size and finally align

² Ecodesign Regulation (EU) 206 2012

the industry on sustainable and definitive long-term solutions by replacing the proposed limits with the market-ready technologies.

Furthermore, regarding the use of fluorinated refrigerants for **servicing or maintenance of stationary refrigeration equipment**, Eurovent holds that it is essential to undertake a virtuous path to reduce the greenhouse impact of the refrigerant stock currently contained in existing equipment and systems, which are subject to continuous losses and emissions. This should result in **considerably lowering the climate impact of the permitted refrigerants**.

Conclusion

Eurovent reiterates its full support for the F-Gas Regulation and wishes to contribute to its revision, to ensure that the climate and energy targets, as well as REPowerEU ambition can be achieved.

Eurovent asks maintaining the current phase down steps until at least 2030.

Furthermore, Eurovent asks exploiting the potential saving of HFCs quota coming from stationary refrigeration and assessing the potential impact of having included the MDIs sector.

Eurovent calls for no additional product bans for heat pumps technologies.

Eurovent, based on the current market-ready low-GWP solutions, also asks to redefine the bans related to stationary refrigeration equipment and maintenance avoiding waste of higher GWP refrigerants.

Eurovent asks calls for an exemption of the product bans for fixed double duct air conditioners..

Eurovent and transparency

When assessing position papers, are you aware whom you are dealing with?

Eurovent's structure rests upon democratic decision-making procedures between its members and their representatives. The more than 1.000 organisations within the Eurovent network count on us to represent their needs in a fair and transparent manner. Accordingly, we can answer policy makers' questions regarding our representativeness and decisions-making processes as follows:

<p>1. Who receives which number of votes?</p> <p>At Eurovent, the number of votes is never determined by organisation sizes, country sizes, or membership fee levels. SMEs and large multinationals receive the same number of votes within our technical working groups: 2 votes if belonging to a national Member Association, 1 vote if not. In our General Assembly and Eurovent Commission ('steering committee'), our national Member Associations receive two votes per country.</p>	<p>2. Who has the final decision-making power?</p> <p>The Eurovent Commission acts as the association's 'steering committee'. It defines the overall association roadmap, makes decisions on horizontal topics, and mediates in case manufacturers cannot agree within technical working groups. The Commission consists of national Member Associations, receiving two votes per country independent from its size or economic weight.</p>
<p>3. How European is the association?</p> <p>More than 90 per cent of manufacturers within Eurovent manufacture in and come from Europe. They employ around 150.000 people in Europe largely within the secondary sector. Our structure as an umbrella enables us to consolidate manufacturers' positions across the industry, ensuring a broad and credible representation.</p>	<p>4. How representative is the organisation?</p> <p>Eurovent represents more than 1.000 companies of all sizes spread widely across 20+ European countries, which are treated equally. As each country receives the same number of votes, there is no 'leading' country. Our national Member Associations ensure a wide-ranging national outreach also to remote locations.</p>

Check on us in the [European Union Transparency Register](#) under identification no. 89424237848-89.

We are Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies – thinking 'Beyond HVACR'

Eurovent is Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies. Its members from throughout Europe represent more than 1.000 companies, the majority small and medium-sized manufacturers. Based on objective and verifiable data, these account for a combined annual turnover of more than 30bn EUR, employing around 150.000 people within the association's geographic area. This makes Eurovent one of the largest cross-regional industry committees of its kind. The organisation's activities are based on highly valued democratic decision-making principles, ensuring a level playing field for the entire industry independent from organisation sizes or membership fees.

Eurovent's roots date back to 1958. Over the years, the Brussels-based organisation has become a well-respected and known stakeholder that builds bridges between the manufacturers it represents, associations, legislators and standardisation bodies on a national, regional and international level. While Eurovent strongly supports energy efficient and sustainable technologies, it advocates a holistic approach that also integrates health, life and work quality as well as safety aspects. Eurovent holds in-depth relations with partner associations around the globe. It is a founding member of the ICARHMA network, supporter of REHVA, and contributor to various EU and UN initiatives.