

## JOINT INDUSTRY COMMENTS ON THE COMMISSION PROPOSAL TO REVISE THE F-GAS REGULATION

EHI, EHPA, EPEE, EUROVENT, and Transfrigoroute International, representing the heating, ventilation, air-conditioning, refrigeration, and refrigerated transport industries in Europe welcome the European Commission's efforts to revise and improve the F-Gas Regulation. **However, we are very concerned about the newly introduced proposal to ban pre-charging of equipment<sup>1</sup>.**

We recognise the need to find ways to address pre-charged equipment in order to safeguard the integrity of the Commission proposal. **The proposed ban, however, will be counter-productive and create a variety of problems for governments, users and industry:**

### 1. Increase of refrigerant emissions and of energy consumption:

Charging in the field is less precise and **will lead to an increase of refrigerant emissions of at least 1 million tonnes of CO<sub>2</sub>-equivalent<sup>2</sup> in 2020 for air-conditioning and heat pump applications only.** Transport refrigeration and domestic appliances, which are also in the scope of the ban, are not even included in this figure. Moreover, there is also a potential impact on energy efficiency due to over or under charging of the equipment, which may lead to a **10% loss in energy efficiency<sup>3</sup>** and thus further increase emissions.

### 2. Higher costs:

The cost for society would increase by at least **€500 million in 2020<sup>4</sup>** due to higher refrigerant costs and increased manpower. Again, this figure does not even include transport refrigeration and domestic applications.

### 3. Safety:

Pre-charging equipment in the factory is not a choice for manufacturers, but a must. Manufacturers have to pre-charge units with refrigerants in order to test proper functioning of the refrigerant circuit. This procedure ensures that safety of equipment is ensured at all times and limits the need for topping up in the field as much as possible. It is also indispensable for manufacturers to warranty their equipment.

### 4. Resource efficiency:

De facto, the proposed ban implies adding two steps to the lifecycle as the refrigerant will first be filled in the factory for testing purposes. It will then have to be removed again and will be contaminated with compressor oil or waste. Before it can be used again, it would need to be sent back as waste to the gas suppliers for cleaning. This would dramatically increase the amount of waste gas in the supply chain.

### 5. Delayed access to products:

End-users risk to be faced with delayed access to the products of their choice, due to the fact that installation will be more lengthy, costly and intensive, whereas the number of qualified installers will not increase in the short term. This may have a detrimental effect for the uptake of heat pumps for example, a technology that is essential for the roadmap towards a low carbon economy by 2050.

**Our joint industry associations call upon the Council to address the Commission proposal to ban pre-charging of equipment and to consider a more balanced solution that can ensure that the integrity of the phase-down is maintained, but without impacting emissions, costs, safety or access to products.**

<sup>1</sup> Art 12 of the current Commission proposal.

<sup>2</sup> Investigation into proposed ban on pre-charged equipment, SKM ENVIROS, December 2012

<sup>3</sup> Impacts of Refrigerant Charge on Air Conditioner and Heat Pump Performance, Kim & Braun, 2010

<sup>4</sup> Investigation into proposed ban on pre-charged equipment, SKM ENVIROS, December 2012

- **About EHI:** The Association of the European Heating Industry, represents and promotes the common interests of 35 market leading company members in the European heating sector, which produce advanced technologies for heating in buildings, including: space heaters (boilers, electric and fuel driven heat pumps, micro-cogeneration), heating controls and components, heat storage and heat emitters (radiators, surface heating and cooling systems), renewable energy systems (solar thermal, geothermal, biomass). In addition, members comprise 13 national industry associations from the EU Member States, Liechtenstein and Switzerland. The industry invests massively in research and development in order to create technically advanced, safe and energy efficient heating systems.
- **About EHPA:** The European Heat Pump Association (EHPA) was established in the year 2000 to promote awareness and proper deployment of heat pump technology in the European market place for residential, commercial and industrial applications. EHPA today has 91 members representing the majority of actors in the European Heat Pump Industry. The association aims to provide technical and economic input to European, national and local authorities in legislative, regulatory and energy efficiency matters. All activities are aimed at overcoming market barriers and dissemination of information in order to speed up market development of heat pumps for heating, cooling and hot water production. It is the declared aim of the association to make heat pumps a core technology in the development towards a more energy efficient, RES based, sustainable energy system. [www.ehpa.org](http://www.ehpa.org).
- **About EPEE:** The European Partnership for Energy and the Environment (EPEE) represents the refrigeration, air-conditioning and heat pump industry in Europe. Founded in the year 2000, EPEE's membership is composed of 40 member companies and national associations across Europe realising a turnover of over 30 billion Euros and employing more than 200,000 people in Europe. As an expert association, EPEE is supporting safe, environmentally and economically viable technologies with the objective of promoting a better understanding of the sector in the EU and contributing to the development of effective European policies. *For more information please visit:* [www.epeeglobal.org](http://www.epeeglobal.org).
- **About EUROVENT:** The European Committee of Air Handling and Refrigeration (Eurovent) is the representative of the European refrigeration, air conditioning, air handling, heating and ventilation industry and represents trade associations from European and non-European countries. Eurovent represents over 1,000 companies in 14 European countries, employing 150,000 employees who jointly generate more than € 25 billion of annual output. Eurovent was initially founded in 1958 and has been functioning under its current name since 1964. Eurovent has become over the years a well-known and respected stakeholder in all industry related matters and, in particular, in climate change and energy efficiency. *For more information please visit:* [www.eurovent-association.eu](http://www.eurovent-association.eu).
- **About Transfrigoroute International:** Founded in 1955 as a non-profit association, TI is the specialist independent umbrella association for the temperature-controlled road transport sector. TI comprises 18 national member associations in Europe and North Africa and unites some 1,500 members involved in temperature-controlled logistics and the transportation of foodstuffs by road tanker vehicles. TI is open to both haulage companies which transport foodstuffs or perishable goods using insulated/refrigerated vehicles, as well as manufacturers of commercial vehicles, trailers, vehicle bodies, refrigerating equipment, and accessories, as well as technical testing organizations. *For more information please visit:* [www.transfrigo.com](http://www.transfrigo.com)

\*\*\*