

## COMMON INDUSTRY COMMENTS ON THE F-GAS REVIEW

In view of the European Parliament's vote of the Environment Committee on 19th June on the F-gas Review, we call upon Members of the European Parliament, to:

### Support an ambitious, yet achievable HFC phase-down schedule (Annex V):

- **The phase-down needs to kick-off at the right level:** The current baseline proposal does not take all emissions into account. In order to accommodate for refrigerant quantities contained in pre-charged equipment and HCFC refrigerants which are still in use and must be replaced, the base-line should be increased by 20%.
- **The phase-down needs to be ambitious, yet realistic:** While we support a gradual phase-down of HFCs, the steps need to take into account the market realities of the complex and diversified sectors that currently use HFCs. This is crucial to ensure that innovative and energy-efficient technologies can be used to their full benefit. For example, this is the case for heat pumps, where not enough alternative solutions are available for all applications. The proposals to reduce HFC consumption with 84% in 2030 does not take this into account.
- **Support an environmentally and cost-effective service and maintenance ban (Art. 11.3):**
- **Postpone the entry into force of the service and maintenance ban to 2030:** This measure takes into account the remaining lifetime of existing equipment, and allows a timely, safe, efficient and affordable switch to alternative solutions.
- **Increase the charge size threshold from 5 to 50 tonnes CO<sub>2</sub>-equivalent, and exempt applications < -50°C and systems that recently converted to comply with the ODS Regulation:** The ban would still cover over 80% of the greenhouse gas emissions and prevents disproportionate burden on SMEs, the refrigerated transport sector and on sectors where no alternatives exist.
- **Allow the use of recycled and reclaimed refrigerants:** This will ensure that the environmental impact of very high GWP refrigerants is minimised by preventing emissions at the end of the lifetime of equipment and provides a true incentive for recovery and recycling.

### Reject a ban on pre-charging (Article 12):

- **A ban on pre-charging is counterproductive:** The handling of f-gases outside a controlled factory environment will increase cost and emissions. Decision makers need to find alternative solutions to include pre-charge equipment in the phase-down.

### Reject additional placing on the market bans (Annex III):

- **Additional placing on the market bans are not required:** The HFC phase-down mechanism represents a fundamental change to the way industry has been operating and will make HFCs an expensive and scarce commodity. To comply with the HFC phase-down scheme, industry needs flexibility and time to develop lower GWP solutions for all applications. Otherwise, energy efficiency, safety and affordability will be jeopardized, which will come at the expense of consumers' health, overall climate objectives, and industry's competitiveness.

### Support a dual legal base:

- **Product requirements must be consistent across the entire EU market:** Maintaining the current internal market legal base provides industry with the basis to plan ahead and ensure compliance. It is essential that requirements for products are equal across the EU to enable the free movement of our products.

**This common statement is signed by European associations active in the automotive industry, refrigerated transport, heating, cooling, refrigeration and heat pump industries as well as the vending industry. Together the associations represent millions of jobs in Europe.**

**About ACEA:** ACEA is the European Automobile Manufacturers' Association ([www.acea.be](http://www.acea.be)), representing the fifteen Europe-based car, van, bus and truck makers. ACEA speaks on behalf of a sector that is vital to EU growth and plays an important part in Europeans' lives, from employment and social benefits, to education, innovation, investment, and product and mobility concepts. ACEA's members provide direct employment to more than 2 million people and indirectly support another 10 million jobs mostly in small and medium-sized enterprises of the automotive supply chain. Annually, ACEA members invest over €26 billion in R&D, or 5% of an annual turnover of over €500 billion.

**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, [www.ehpa.org](http://www.ehpa.org)) promotes awareness and proper deployment of heat pump technology in the European market place for residential, commercial and industrial applications. EHPA 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.

**About EPEE:** The European Partnership for Energy and the Environment (EPEE) represents the European refrigeration, air-conditioning and heat pump industry (RAC) which directly employs over 200,000 people in the EU. EPEE members also create indirect employment through a vast network of small and medium-sized enterprises such as contractors who install, who service and maintain our equipment. EPEE members have manufacturing sites and research and development facilities across the EU, which innovate for the global market.

**About the European Vending Association:** The European Vending Association (EVA) is a not-for-profit organisation, established in Brussels since 1994. The EVA represents the interests of the European vending industry vis-à-vis the European Institutions and other relevant authorities or bodies. The EVA represents all segments of the vending industry: machine and component manufacturers, suppliers of commodities (ingredients, cups, confectionery, soft drinks, etc.) and operators (mostly SMEs, managing the machines on a daily basis: sitting, cleaning, filling, maintaining and repairing the machines). Its membership is composed of national associations and individual companies. For more information please visit: <http://vending-europe.eu/eva/home.html>

**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 Pneurop:** Pneurop is the European Association of Manufacturers of Compressors, Vacuum Pumps, Pneumatic Tools and Air & Condensate Treatment Equipment, represented by their National Associations. Pneurop represents more than 130 manufacturers in the EU having a combined turnover of about 21 billion euro. Pneurop speaks on behalf of the manufacturing industry in European and International forums regarding the harmonisation of technical, normative and legislative developments. Pneurop member companies manufacture refrigerant air dryers for dewpoint control of compressed air, which use HFC for which no reliable and safe alternatives are available yet. For more information, please visit: [www.pneurop.eu](http://www.pneurop.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 15 national member associations in Europe and North Africa and unites a thousand of 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.transfrigoroute.eu](http://www.transfrigoroute.eu)