COMMON INDUSTRY COMMENTS ON THE F-GAS REVIEW

In view of the 3rd trilogue meeting on the F-gas Review, our associations - active in the automotive industry, refrigerated transport, heating, cooling, refrigeration and heat pump industries as well as the vending industry, representing millions of jobs in Europe – renew their support for a first reading agreement before the European Parliament elections, but call upon the decision-makers to ensure a balanced approach towards the new f-gas rules.

Support the Commission proposal for a phase-down: an ambitious, yet achievable HFC phase-down schedule (Annex V):

- Our associations **support the HFC phase-down**, which introduces ambitious and extremely stringent requirements for industry and end-users, and accept that the HFC consumption (expressed in CO2-equivalent) needs to be reduced **by nearly 80%** by 2030. This is unprecedented and becomes even more significant considering that heating, cooling and refrigeration will grow by at least 50% by 2030. The heat pump market alone, which will be essential to achieve Europe's 2050 climate and energy goals, is expected to at least triple by 2030.

Support an environmentally and cost-effective service and maintenance ban (Art. 11.3):

- Our associations **strongly support the current Council amendments** to the service and maintenance ban which increases the charge size threshold from 5 to 40 tonnes of CO2-equivalent, and exempts applications operating below -50°C and systems that have been recently converted to comply with the ODS Regulation.
- We also support **the timing** of the entry into force of the service and maintenance ban by 2022 as suggested by the Council.
- We would like to stress the importance of the continued **use of recycled and reclaimed refrigerants for as long as possible** - at least until 2030 as proposed by the Council -, to ensure that the environmental impact of very high GWP refrigerants is minimised by preventing emissions at the end of the lifetime of equipment and providing 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. The proposed traceability scheme is a good, cost-effective proposal. In addition, the New Entrants Reserve should be increased to allow HFC pre-charge equipment to opt in the quota mechanism.

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

- **Additional sub-sector bans on placing on the market 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, safe and energy-efficient solutions for all applications.
- **Why a sub-sector approach does not work:** The definition of sub-sectors is unsuitable and impractical for regulatory purposes. A ban intended for one application may unintentionally apply to other applications. For example, a heat pump is also a split air-conditioner, so a ban on split AC may also ban heat pumps. This would create unfair competition between different AC systems and this is counter-productive, as alternatives may not be available for all sub-sectors, but also impossible to enforce for national authorities.
- **Why a GWP threshold approach is better:** If bans are deemed necessary, our associations believe that setting broad GWP threshold limits for applications will set unambiguous, clear targets for industry and users, and will avoid the need for sub-sector applications. For example, targeting refrigerants with a GWP above 2500 in all stationary applications will achieve emission reductions of 38 million tonnes of CO2-eq in 2030, which in itself represents more than 50% of the emission reduction target.

About ACEA: ACEA is the European Automobile Manufacturers' Association (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) 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

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

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