



Response to European Commission's public consultation on F-Gas review

Brussels, 9th December 2012

A. General information about you

A.1 Please enter your name and, where relevant, the name of the organisation you represent. Please include also E-mail address for contact purposes for use only if we need clarification about your response. * (compulsory) (between 3 and 1000 characters)

AREA is the European association of refrigeration, air conditioning and heat pump (RACHP) contractors. Established in 1989, AREA voices the interests of 19 national associations from 16 European countries, representing more than 9,000 companies (mainly small to medium sized enterprises), employing some 125,000 people.

AREA

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A.2 I am replying as / on behalf of: * (compulsory) (at most 1 answer)

- organised stakeholders

A.3 Please enter your registration number in the [Transparency Register](#). It is Commission policy to treat submissions from organisations that choose not to register as individual contributions ([see exceptions](#)). Please check the validity of your entry via the [search function](#) in the Transparency register – invalid entries will by default be regarded as unregistered. (optional) (between 1 and 50 characters)

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A.4 Please specify the category that most closely describe your organization * (compulsory) (at most 1 answer)

- other type of companies/ professional association

A.5 Please indicate your country or, where relevant, the geographical area you represent (optional) (at most 1 answer)

- EU wide

A.6 Please select the option best describing the use category relevant for you, if any (max 3 choices) (optional) (at most 3 answers)

- commercial refrigeration and freezing equipment

www.area-eur.be

- room air-conditioning (factory-sealed movable and single-split systems)
- heat pumps

A.7 We may publish your response, together with your identity, on the Commission website, where it will be publicly accessible. Though if you request it, publication will be anonymous. How would you prefer your contribution to be published, if at all? * (compulsory) (at most 1 answer)

- under the name indicated - I consent to publication of all information in my contribution and declare that none of it is under copyright restrictions that prevent publication.

B. Questions on choice of policy action

B.1 The European Commission is looking to set out a plan to reduce EU emissions by 80-95% by 2050. In this context, how do you judge current EU policies on greenhouse gas emissions from F-gases (e.g. the F-Gas Regulation on certain F-gases and the Directive on mobile air-conditioning)? (optional) (at most 1 answer)

- fully sufficient if properly implemented

B.2 What are the main obstacles to switching to alternative technologies with lower impact on the climate (i.e. fluids with low global warming potentials or other non-in-kind technologies) in the applications currently relying upon F-gases? (max 3 choices) (optional) (at most 3 answers)

- alternative technologies will not be available in specific applications
- alternative technologies will not meet the same performance standards (e.g. reliability, energy efficiency, insulation properties etc)
- alternative technologies will require greater effort to meet the same safety standards

B.3 Please specify (optional) (maximum 1000 characters)

It would be too simplistic to assess the opportunity of switching to alternative technologies on the sole basis of the refrigerant's GWP. The assessment must be done in light of the energy efficiency and TEWI of the system under consideration. In contractors' non refrigerant-biased experience, there is no one-size-fits-all solution. Whereas alternatives are mature for some systems, on others, energy efficiency may be much worse than the current norm equivalents.

Low GWP solutions also present safety issues (flammability, toxicity, pressure) and will require harmonised training requirements to ensure uniform and expert installation and servicing of low GWP systems throughout the EU. Indeed, the first findings of an AREA internal survey on this aspect show that currently available schemes are rare and very heterogeneous. Moreover, safety issues will affect contractors' insurance costs (in addition to training costs).

B.4 In the absence of global action to phase-down HFCs, which options would you consider the most appropriate, at EU level, to contribute to the established targets for reducing greenhouse gas emissions? (max. 3 choices) (optional) (at most 3 answers)

- encouraging voluntary agreements for specific sectors where replacement is technically feasible and cost-effective
- strengthening, where possible, measures aiming at containment and proper recovery of F-gases (e.g. through stricter and/or broader application of existing measures in the F-gas Regulation)

B.5 Please specify *(optional)* (maximum 1000 characters)

The Regulation has already shown significant reduction both in the consumption (weight adjusted) and the leakage rate of HFCs in SRAC equipment. This has been partly due to the sector specific voluntary roll out of CO2 systems where it was technically feasible and energy efficient.

The Regulation firstly needs to be fully implemented and enforced throughout the EU. Improvements and clarifications are also required, as AREA pointed out in its official position on the F-Gas Review. One could mention the need for a clearer definition of the scope to stress that regardless of the refrigerant charge all F-gas systems must be installed by certified technicians, as long as putting into service requires interfering with refrigerant circuits.

The 3 kg threshold for log book records and periodical leakage checking needs to be reduced to ensure the many thousands of domestic heat pumps are included and therefore properly treated at their end of life.

B.6 If a global agreement to phase-down HFCs is eventually concluded, which policy options (if any) would be the most appropriate to complement, at EU level, the establishment of maximum, gradually declining, limits for the quantity of HFCs placed on the EU market expressed in terms of CO2 equivalent. (max 3 choices) *(optional)* (at most 3 answers)

- encouraging voluntary agreements for specific sectors where replacement is technically feasible and cost-effective
- strengthening, where possible, measures aiming at containment and proper recovery of F-gases (e.g. through stricter and/or broader application of existing rules in the F-gas Regulation)

B.7 Please specify *(optional)* (maximum 1000 characters)

See B5

B.8 If you have a specific suggestion on how to reduce leaks and improve recovery of F-gases from products through stricter and/or broader application of the type of measures already present in the F-gas Regulation, please briefly specify below: *(optional)* (maximum 1000 characters)

- Central (national) registration of all RACHP systems containing fluorinated gases for the reasons given in B5/B7;
- Ensure all RACHP systems are only installed and commissioned by properly qualified technicians by restricting sales of pre-charged split systems or banning the import thereof (see AREA position on this issue, available at www.area-eur.be);
- Removal of flare nuts wherever possible;
- Reducing the 3 kgs threshold, which has become outdated because of technological advancement (3kg was aimed at smaller 3kw system but now produces up to 15kw of heating or cooling), to include all systems other than portable plug in self contained units;
- Stipulate mandatory registration of certified companies and personnel in order to facilitate controls, compliance and mutual recognition between Member States.
- Include mobile refrigeration (maritime, road, rail) in the Regulation's scope.

B.9 If you have any specific suggestions of technical adjustments to the current F-gas Regulation, e.g. to clarify its provisions, please briefly specify below: *(optional) (maximum 1000 characters)*

- The 3 kg threshold is too high for modern systems. This should be reduced to 500 gm to include nearly all split type systems and above;
- Article 5, paragraph 4 of the F-Gas Regulation should be amended in order to switch the responsibility of selling fluorinated gases in containers to certified installers on wholesalers/distributors. Countries such as France already apply this interpretation. At the moment the wording of the Regulation says you must not take delivery but some wholesalers are still supplying to non qualified people. This goes entirely against the objectives of the Regulation.

C. Questions on potential impacts

C.1 Who do you think will be most exposed to any negative impacts of a strengthened approach to F-gas emissions? (max 2 choices) *(optional) (at most 2 answers)*

- Companies servicing relevant products or equipment
- Others

C.2 Please specify *(optional) (maximum 1000 characters)*

Those most exposed will be those installation, service and maintenance companies who have not achieved, nor tried to achieve, proper certification or qualification. Without effective policing there is no urgency for these companies to comply at present.

C.3 Who do you think will benefit most from a strengthened approach to F-gas emissions? (max 2 choices) *(optional) (at most 2 answers)*

- Commercial or industrial users of relevant products or equipment
- Others

C.4 Please specify *(optional) (maximum 1000 characters)*

End users (whether commercial, industrial or individual) life cycle costs will decrease as containment improves: less gas used for topping up and better energy efficiency from better maintained systems

C.5 What type of application (if any) do you think will be most positively affected by a phase-down of HFCs? (max 3 choices) *(optional) (at most 3 answers)*

- others or no specific use category

C.6 What type of application (if any) do you think will be most negatively affected by a phase-down of HFCs? (max 3 choices) *(optional) (at most 3 answers)*

- commercial refrigeration and freezing equipment
- room air conditioning (factory-sealed movable and single-split systems)
- heat pumps

C.7 Which policy option do you expect to impose the greatest administrative burden? *(optional) (at most 1 answer)*

- establishing maximum, gradually declining limits to the quantity of HFCs placed on the EU market (phase-down) expressed in terms of CO2 equivalent

C.8 Please specify *(optional) (maximum 1000 characters)*

The difficulty of policing this policy option would be the greatest difficulty without additional measures being taken: firstly, full implementation and effective policing of the current Regulation as it stands is needed; secondly, implementation of the AREA position on pre-charged split systems is needed to ensure there is only one legitimate route to market of the refrigerants in question, i.e. through official trade supplier routes and supplied in proprietary gas bottles.

These measures will make sure that there is an effective use monitoring and reporting scheme in place. If this is not done then it will be impossible to accurately establish whether or not a phase down is taking place. Finally, one should not forget that the extra administrative costs on enforcement by authorities and this whereas enforcement already is a great concern.

C.9 How do you think a shift towards alternatives having a lower or no global warming potential will affect the competitiveness and market shares of European businesses (or the business you represent)*(optional) (at most 1 answer)*

- Harmful for competitiveness (specify below)

C.10 Please, specify your expectations regarding the order of magnitude, e.g. expected percentage increase in costs *(optional) (maximum 1000 characters)*

Some argue that alternative technologies exist for all RACHP systems. This is not the case and what they forget to say is that it is only for some systems that these technologies are at least as energy efficient as HFC solutions. When it is the case, no significant change on competitiveness is to be expected. In all the other cases, the technically available alternatives at present will bring with them significant energy penalty of up to 40 to 50% additional energy consumption for the same cooling or heating duty. Industry end users will, therefore, face severe competitiveness issues because of higher energy consumption.

Moreover, low GWP technologies entail higher costs for installers (training, insurance costs due to safety issues...) who will have to at least partly pass them on to end users resulting in loss of competitiveness for installing contractors and industrial or commercial end users

D. Additional comments

Please include any additional comments you might have (max. 5000 characters) or upload a document (max 1 document, if possible in MS Word, pdf or rich text format). In exceptional cases and only if you experience problems with this questionnaire, you can also send us documents by email (CLIMA-Fgas@ec.europa.eu). *(optional) (maximum 5000 characters)*

For more details on AREA replies, please see AREA general position on the review of the F-Gas Regulation.