Consultation on reducing fluorinated greenhouse gas emissions - Further action at EU level

Meta Informations

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General information about you

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.

KFCh is the Polish refrigeration and air conditioning employers association. It was established in 2000. KFCh is the largest RAC organisation in Poland and represents the interests of 127 companies (mainly small to medium sized enterprises). Krajowe Forum Chłodnictwa - Związek Pracodawców (National Refrigeration Forum) Al. Jana Pawła II 23 lok. 206 00-854 Warszawa Email: biuro@kfch.pl Grzegorz Gontarz

I am replying as / on behalf of:	organised stakeholders

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.

Please specify the category that most closely describe your organization	companies servicing products or equipment normally relying upon F-gases or alternative technologies
Please indicate your country or, where relevant, the geographical area you represent	Poland
Please select the option best describing the use category relevant for you, if any (max 3 choices)	domestic refrigeration and freezers commercial refrigeration and freezing equipment industrial refrigeration and freezing equipment
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	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.

would you prefer your contribution to be published, if at all?	

Questions on choice of policy action

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)?	fully sufficient if properly implemented
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)	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
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)	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) other policy options at EU level

Please specify

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 shouldn't be reduced because in fact it would be impracticable to supervise lower thresholds and law relating to it would be a dead letter.

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)	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) other policy options at EU level

Please specify

See B5

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:

- 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; - 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.

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:

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.

Questions on potential impacts

Who do you think will be most exposed to any negative impacts of a strengthened approach to F-gas emissions? (max 2 choices)	Companies servicing relevant products or equipment Others

Please specify

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.

Who do you think will benefit most from a strengthened approach to F-gas emissions? (max 2 choices)	Commercial or industrial users of relevant products or equipment Others

Please specify

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.

What type of application (if any) do you think will be most positively affected by a phase-down of HFCs? (max 3 choices)	others or no specific use category
What type of application (if any) do you think will be most negatively affected by a phase-down of HFCs? (max 3 choices)	commercial refrigeration and freezing equipment room air conditioning (factory-sealed movable and single-split systems) heat pumps
Which policy option do you expect to impose the greatest administrative burden?	establishing maximum, gradually declining limits to the quantity of HFCs placed on the EU market (phase-down) expressed in terms of CO2 equivalent
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)?	Harmful for competitiveness (specify below)

Please, specify your expectations regarding the order of magnitude, e.g. expected percentage increase in costs

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.

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 questionanire, you can also send us documents by email (**CLIMA-Fgas@ec.europa.eu**).