

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.

Mr Enda Hogan on behalf of The Institute of Refrigeration Ireland. info@instituteofrefrigerationireland.ie

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.

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Please specify the category that most closely describe your organization

other type of companies/ professional association

Please indicate your country or, where relevant, the geographical area you represent

Ireland

Please select the option best describing the use

commercial refrigeration and freezing equipment

category relevant for you, if any (max 3 choices)	industrial refrigeration and freezing equipment air-conditioning excluding room a/c, and a/c in modes of transport
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?	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.

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) setting up deposit and refund schemes for products involving F-gases
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 CO ₂ 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) setting up deposit and refund schemes for products involving F-gases
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 in each Member State; Central (national) electronic register for Fgas certified companies and staff in each Member State. Restrict	

sales of pre-charged split systems or ban the import thereof; Continuation of information campaigns to make sure that operators understand their obligations; The European Commission should continue with its infringement procedures for Member States which are not yet compliant with the F-Gas rules.

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:

Distributors or wholesalers should only be allowed to sell refrigerants to certified companies. This should be a shared responsibility, i.e., it should also be illegal for uncertified companies to take delivery of refrigerants. Any company or person (not only operators) who assigns work to a third party on a refrigerant circuit shall make sure that this 3rd party is properly certified. Reduce the 3 kgs threshold to 500 gm to include all systems other than portable plug in self contained units; Include mobile refrigeration (maritime, road, rail) in the Regulation's scope; Removal of flare nuts wherever practical

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)

Commercial or industrial users of relevant products or equipment
Others

Please specify

This is difficult to answer given the it is unclear what is meant by a "strengthened approach". If this simply means a greater focus on implementation of existing regulations, there should be no negative impact. If this means an immediate phase-down, it will have an immediate negative impact, in particular on end users and RAC contractors.

Who do you think will benefit most from a strengthened approach to F-gas emissions? (max 2 choices)

Others

Please specify

Again, it is difficult to answer given the it is unclear what is meant by a "strengthened approach". If this simply means a greater focus on implementation of existing regulations, the benefit will accrue to compliant companies. If this means an immediate phase-down, clearly producers of products or equipment employing alternative technologies will benefit the most.

What type of application (if any) do you think will be most positively affected by a phase-down of HFCs? (max 3 choices)

no positive impact

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?

introducing additional prohibitions on use and marketing of certain equipment and products where cost-effective alternatives exist (e.g. a ban on application X containing hydrofluorocarbons as of date Y)

How do you think a shift towards alternatives

Harmful for competitiveness (specify below)

having a lower or no global warming potential will affect the competitiveness and market shares of European businesses (or the business you represent)?

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

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).

The Institute of Refrigeration Ireland urges the Commission to focus their efforts on making sure the existing regulations are implemented in full and across all Member States.