

F-Gas regulation: ongoing revision and industry concerns

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Roadmap

1. **Who we are**
2. **EU F-Gas Regulation:
timeline**
3. **Industry concerns**
4. **Conclusions**

Who we are: In a Nutshell



Founded in 1958



Strong network of Europe's leading national industry associations



Members from 30+ countries in Europe, Middle East, Africa



Representing over 150.000 employees



More than 1.000 manufacturers

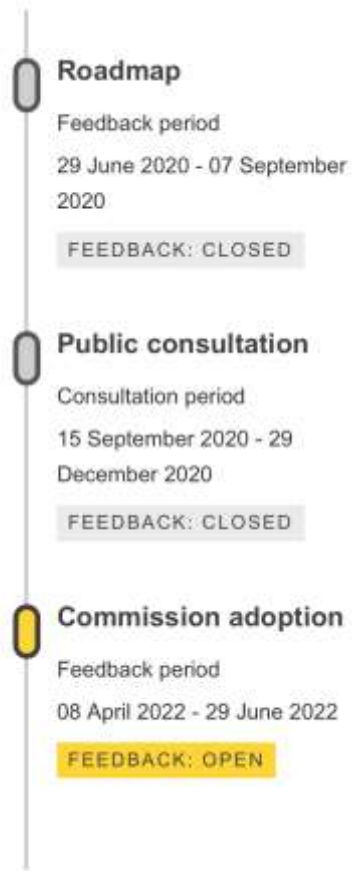


Generating combined annual turnover of 30+ bn EUR

Roadmap

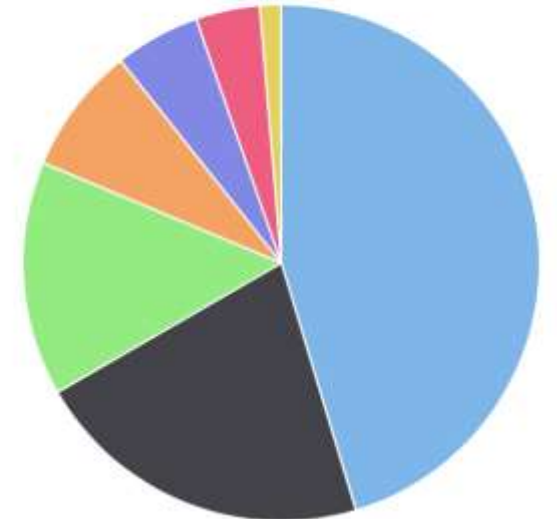
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EU F-Gas Regulation: Review timeline



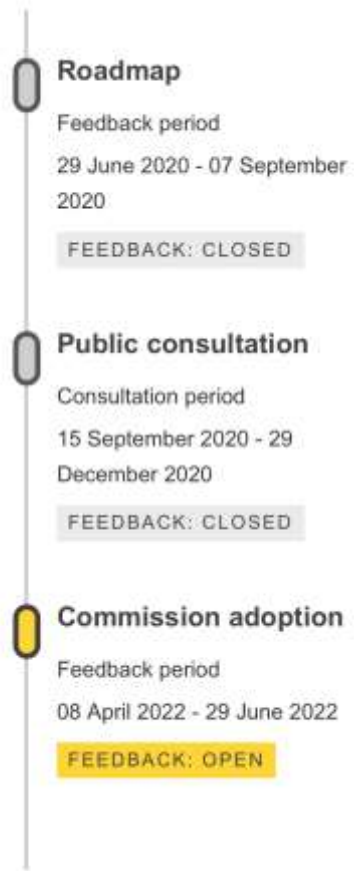
By category of respondent

- Company/business organisation: 34 (45.33%)
- Business association: 16 (21.33%)
- Non-governmental organisation (NGO): 11 (14.67%)
- EU citizen: 6 (8.00%)
- Public authority: 4 (5.33%)
- Environmental organisation: 3 (4.00%)
- Other: 1 (1.33%)



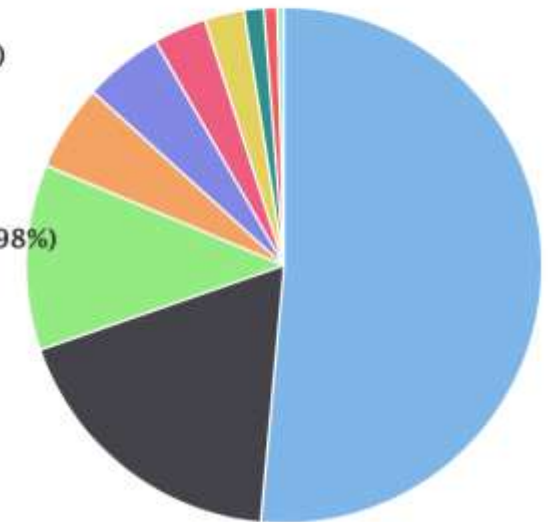
76 feedback instances received

EU F-Gas Regulation: Review timeline



By category of respondent

- Company/business organisation: 124 (51.45%)
- Business association: 44 (18.26%)
- EU citizen: 28 (11.62%)
- Other: 13 (5.39%)
- Non-governmental organisation (NGO): 12 (4.98%)
- Public authority: 8 (3.32%)
- Academic/research Institution: 6 (2.49%)
- Consumer organisation: 3 (1.24%)
- Environmental organisation: 2 (0.83%)
- Trade union: 1 (0.41%)



241 feedback instances received

EU F-Gas Regulation: Review timeline



Roadmap

Feedback period

29 June 2020 - 07 September
2020

FEEDBACK: CLOSED

Public consultation

Consultation period

15 September 2020 - 29
December 2020

FEEDBACK: CLOSED

Commission adoption

Feedback period

08 April 2022 - 29 June 2022

FEEDBACK: OPEN



5 April 2022: EC adoption
Feedback by 29 June 2022

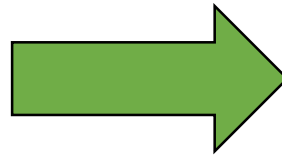
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Industry concerns

The ambitions of the F-Gas Regulation should support the EU's climate targets and the European Green Deal objectives.

The recent geopolitical developments have led to the urgent need to reduce energy dependency and to accelerate the roll out of 30 million new heat pumps in Europe by 2030 (REPowerEU).



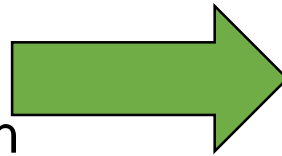
The proposed severe quota reduction and the market reality of the heat pump technology **will not allow to meet the goal of REPowerEU and the EU Green Deal decarbonisation targets set by 2030**

Industry concerns (cont.)

Steep reduction in allowed HFCs on the market from 2024 onwards that would phase-out HFCs for new equipment in room air conditioning and heat pump sector from 2027 onwards

There are 27.764 models of heat pump using HFCs on the market; The Ecodesign Regulations covering them are also currently being revised to meet more stringent requirements

Adapting to these requirements and simultaneously moving to HFC alternatives is too challenging within the proposed timeframe



Keep the current phase down steps until at least 2030

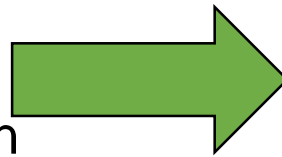
Consider the potential saving of HFCs quota coming from the stationary refrigeration sector that already switched towards low-GWP technologies

Industry concerns (cont.)

Steep reduction in allowed HFCs on the market from 2024 onwards that would phase-out HFCs for new equipment in room air conditioning and heat pump sector from 2027 onwards

There are 27.764 models of heat pump using HFCs on the market; The Ecodesign Regulations covering them are also currently being revised to meet more stringent requirements

Adapting to these requirements and simultaneously moving to HFC alternatives is too challenging within the proposed timeframe



To support the contribution of heat pump technology to the EU Climate ambitions **there should be no additional product bans introduced for heat pumps**

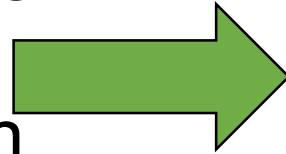
Industry concerns (cont.)



The text is unclear in scope and creates confusion and ambiguity, e.g., the terms '**self-contained**' (Annex IV-11-12-16-17) and **plug-in** (Annex IV — 17-17) are not supported by any definition

Industry concerns (cont.)

- The EC acknowledges that due to safety constraints some bans refer to an exemption 'except when required to meet safety standards'



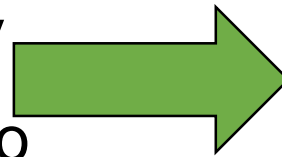
How Market **Surveillance Authorities will handle these exemptions**, which could put at **risk the EU single market**, and how to avoid related **possible loopholes**

Industry concerns (cont.)

The proposed bans do not reflect the status of the art of the stationary refrigeration application.

The stationary refrigeration industry has already completely adapted its technologies and product portfolio to use refrigerants having GWP 1 and 3

This while guaranteeing a high level of efficiency even in the warmest climatic regions of Europe and without compromising on safety



The Commission should strengthen the ambition and **promote the adoption of low GWP technologies for stationary refrigeration equipment**

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Conclusions

- Eurovent reiterates its full support for the F-Gas Regulation and wishes to contribute to its revision, to ensure that the climate and energy targets, as well as REPowerEU ambition can be achieved.
- Eurovent asks maintaining the current phase down steps until at least 2030.
- Eurovent asks exploiting the potential saving of HFCs quota coming from stationary refrigeration
- Eurovent calls for no additional product bans for heat pumps technologies.
- Eurovent, based on the current market-ready low-GWP solutions, also asks to redefine the bans related to stationary refrigeration equipment and maintenance avoiding waste of higher GWP refrigerants.

Thanks for your attention!

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