5 March 2022

Joint Statement on the upcoming European Commission Proposal for the revision of the EU F-Gas Regulation

The signatories of this joint statement represent the full value chain of the Refrigeration, Air Conditioning and Heat Pump sector in Europe.

Our technologies have a key role to play in reducing Europe’s energy dependency on fossil fuels in the heating and cooling sector. The urgency to accelerate their deployment, established by the 2030 EU climate and energy goals, has become even more pronounced in view of recent geopolitical developments.

We call on the European Commission to calibrate its upcoming F-Gas Revision proposal with this urgency. F-gases, such as HFCs, are needed as refrigerants in our technologies.

Modelling performed by the sector shows that the current HFC-Phase-down quotas of the existing F-Gas Regulation would already pose a challenge for the task to install the 50 million heat pumps necessary to implement the 2030 target. The modelling further shows that the greenhouse gas emissions from F-gases in heat pump equipment are very small when compared with the emissions that can be saved by replacing fossil fuel heating with heat pumps.

The model that was used by the European Commission consultants to prepare the F-Gas Regulation revision suggests a “Maximum Substitution Scenario” which would lead to significantly reduced quantities for HFC refrigerants in the coming years and thus seriously jeopardize the necessary growth of heat pumps.

While refrigerants with lower or lowest Global Warming Potential are the best choice for some applications in some sub-sectors, the complexity of refrigeration, air-conditioning and heat-pump technologies and applications requires a full range of refrigerants (including significant quantities of HFCs) to speed up their massive deployment in a safe and highly efficient manner.

Any new measure in the revised F-Gas Regulation that would limit in a foreseeable future the availability or the choice of refrigerants (bans, stricter quotas) would necessarily slow down the speed at which heat-pump equipment will be deployed. A “silo” approach on limiting F-Gas refrigerants without taking into account the outweighing benefits arising from the growth in our technologies would lead to inadvertent environmental, social, economic and political consequences for Europe’s citizens and businesses.

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1 75% of European greenhouse gas emissions are related to energy production and consumption. Heating and cooling represent half of the final energy consumption in Europe, and 80% is still based on fossil fuels.
2 HFC Outlook EU
3 AnaFGas model
**AREA** is the European association of refrigeration, air conditioning and heat pump contractors. Established in 1989, AREA voices the interests of 24 national associations from 21 countries representing 13,000 companies employing 110,000 people and with an annual turnover approaching € 23 billion. [http://area-eur.be/](http://area-eur.be/)

**EHPA** is the European Heat Pump Association. In a fully decarbonised Europe, heat-pump technologies are the number one heating and cooling solution, being a core enabler for a renewable, sustainable and smart energy system. They integrate multiple energy sources, bridging the electric and thermal sector on a local and regional level (micro grids, DHC). Heat pumps are easy to install and widely used in all thermal applications (buildings, transport, white goods) and industrial processes. Refrigerants and other components are available in sufficient quantities. The technology is recognised for its merits in legislation and existing energy models. EHPA is a forward-looking association aiming at putting heat pumps at the centre of the energy system by communicating the benefits of heat pumps, providing relevant information and being a reference point and integrator to all stakeholders. [https://www.ehpa.org/](https://www.ehpa.org/)

**EPEE** represents the refrigeration, air conditioning and heat pump industry in Europe. Founded in the year 2000, EPEE’s membership is composed of over 50 companies as well as national and international associations from three continents (Europe, North America, Asia). With manufacturing sites and research and development facilities across the EU, which innovate for the global market, EPEE member companies realise a turnover of over 30 billion Euros, employ more than 200,000 people in Europe and also create indirect employment through a vast network of small and medium-sized enterprises such as contractors who install, service and maintain equipment. [https://epeeglobal.org/](https://epeeglobal.org/)