



ENVI F-gas draft report, proposed by the Rapporteur, would jeopardize the wider EU climate and energy targets

Joint statement on the European Parliament's ENVI Draft Amendments to the F-gas Regulation Revision
7 November 2022

Representing the full value chain of the refrigeration, air-conditioning and heat pump sector (RACHP) in Europe, the signatories of this joint statement express their strong concerns about the draft report by the lead Rapporteur of the F-gas Regulation Revision, MEP Bas Eickhout, from 10 October 2022.

The co-signatories share the EU's Green Deal ambition to accelerate the transition towards climate neutrality by 2050. To achieve this goal, a careful balance needs to be struck between reducing emissions from HFCs (used as refrigerants in RACHP equipment) and reducing emissions by installing more heat pumps. The amendments put forward by the Rapporteur would jeopardize energy saving targets and strengthen the European dependence on fossil fuel sources in the next years.

Achieving the 2030 targets and the REPowerEU action plan to rapidly wean the EU off fossil fuel imports will necessitate a push on energy efficiency in Heating and Cooling and, most urgently, millions of new heat pumps throughout Europe in the coming years - not only small residential heat pumps, but all sizes and all kinds of heat pump technologies applications, including hydronic, air-to-air types, ground source, office and apartment installations, district heating, low-temperature industrial heating etc.

In revising the F-gas Regulation the total Greenhouse Gas (GHG) effects of the RACHP equipment need to be considered:

Heat pumps are a prompt way to deliver reduction of GHG emissions. Indeed, emission savings arising from using heat pumps instead of the direct consumption of fossil fuel are always making this technology the one with the lower Total Equivalent Warming Impact (TEWI), independently from the refrigerant used.

The HFC phase down path and the bans on F-gases in heat pumps proposed by the Rapporteur's draft ENVI Report need to be adjusted to achieve the decarbonization of the sector. The Rapporteur's draft ENVI Report risks to jeopardize the entire RACHP sector in Europe, in particular heat pumps would not be allowed to deliver their potential to reduce dependence on fossil fuels.

However, the co-signatories support the Rapporteur's proposal to strengthen the training and certification requirements for alternative refrigerants. The successful achievement of the F-gas Regulation's objectives greatly depends on a large uptake of alternative low GWP refrigerants. Such an uptake relies itself on sufficient knowledge and competence from the HVAC contracting sector on these alternative low GWP refrigerants. Training and certification will be required to avoid accidents, injury and fatalities involving systems with alternative greenhouse gas refrigerant systems.

Currently, the proportion of F-gas certified personnel trained on alternative refrigerants ranges from 3.5% to 7% depending on the type of alternative refrigerant. Extending the current F-gas training and certification scheme to alternative refrigerants would address this issue. Ensuring the widespread of training and certifications for those refrigerants across Europe will require time.

Against that background, we call on Members of European Parliament to strongly reject the proposed amendments on the HFC phase down path as well as Annex IV bans on key technologies, particularly heat pumps. A realistic approach in these provisions would be of primary importance to mitigate the climate change and energy crisis in Europe.

Co-signatories:

AREA: AREA is the European association of refrigeration, air conditioning and heat pump contractors. Established in 1989, AREA voices the interests of 25 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/>

AFEC: AFEC, Asociación de Fabricantes de Equipos de Climatización, is a non-profit association representing manufacturers companies of air conditioning that develop their business in the mentioned sector and that have social address in the Spanish territory. As well as other entities that hold the title of Members of Honor, on the basis of their relevant contributions. <https://www.afec.es/en/>

ASERCOM: ASERCOM, the Association of European Component Manufacturers is the platform for dealing with scientific and technical topics and their challenges, promoting standards for performance rating, methods of testing and product safety, focusing on improved environmental protection, serving the refrigeration and air conditioning industry and its customers. It is the aim of ASERCOM to be the platform for dealing with scientific and technical topics and their challenges, promoting standards for performance rating, methods of testing and product safety, focusing on improved environmental protection, serving the refrigeration and air conditioning industry and its customers. ASERCOM addresses top issues and communicates relevant opinions of its members to the industry, the public, governmental bodies and non-governmental organisations. <https://www.asercom.org/>

EHPA: 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/>

Eurovent: Eurovent is Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies. Its members from throughout Europe represent more than 1.000 companies, the majority small and medium-sized manufacturers. Based on objective and verifiable data, these account for a combined annual turnover of more than 30bn EUR, employing around 150.000 people within the association's geographic area. This makes Eurovent one of the largest cross-regional industry committees of its kind. The organisation's activities are based on highly valued democratic decision-making principles, ensuring a level playing field for the entire industry independent from organisation sizes or membership fees. www.eurovent.eu

EPEE: 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 member 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. www.epeeglobal.org.

JBCE: Founded in 1999, the Japan Business Council in Europe (JBCE) is a leading European organisation representing the interests of over 80 multinational companies of Japanese parentage active in Europe. Our members operate across a wide range of sectors, including information and communication

technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceutical, railway, textiles and glass products. <http://www.jbce.org>

JRAIA: The Japan Refrigeration and Air conditioning Industry Association (JRAIA) represents all the major Japanese manufacturers of refrigeration and air conditioning equipment. A significant majority of all air conditioning and refrigeration products sold in Europe are produced and marketed by member companies of JRAIA. Air conditioning and refrigeration technology was developed primarily in Japan. This know-how and expertise has been transferred to the EU and improves working and living conditions. The European investments and commitments of JRAIA companies are significant. <https://www.jraia.or.jp/english/index.html>