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The F-gas debate: Industry offers concrete proposals to the European Parliament

Industry holds out hope that the European Parliament will take a practical approach to the challenge of reducing climate warming F-gas emissions and support the view taken by its industry committee in the upcoming plenary vote

Brussels, 22nd March 2023: An alliance of 12 leading European associations and global partners active in the European market and representing industries manufacturing, servicing and installing heating, cooling, refrigeration and foam insulation solutions offered proposals to the European Parliament to effectively implement an F-gas phasedown while achieving the EU's climate and energy security goals.

On 30th March, Parliament will vote on the F-Gas Regulation Revision that aims to reduce emissions from hydrofluorocarbons (HFCs) and related fluorinated substances, which are used in many products, including heat pumps, air conditioning, refrigeration and foam insulation. The alliance is now offering several concrete and ambitious [amendment proposals](#) to the F-Gas Regulation Revision proposed by the Commission.

“We as an alliance recognised the need to offer our expertise and industry knowledge to ensure Europe’s carbon neutrality goals are not derailed by a well-meaning but ineffective regulation,” said Russell Patten, Director General of the European Partnership for Energy and the Environment (EPEE). “We are proud to offer these proposals and fully support the further phase down of HFCs.”

In regard to the Commission’s proposed F-gases phase down, the alliance recommends retabling the Committee on Industry, Research and Energy (ITRE) opinion amendment 75 to allow for sufficient amounts for new heat pump installations, maintenance of existing stock of equipment and exports. Heat pumps are a critical component of the REPowerEU plan, but they require fluorinated and non-fluorinated refrigerants depending on their type, size, localisations, national requirements and consumer needs.

“The Commission’s proposal limits HFCs to an extent that would make it impossible to deliver the heat pumps required to meet our energy security goals,” said Patten. “In addition, the Environment Committee’s proposal to adjust the phase down on an annual basis would seriously obstruct industry’s ability to conduct medium- and long-term planning.”



For product bans, the alliance made specific suggested amendments to better reflect granularity and variety of technologies. Industry has already adapted its technologies and product portfolio to use low-GWP refrigerants, but in many cases, such as thermal insulation, no viable alternative is yet available. It also called for a revision to restrictions included in the Commission plan, which would otherwise discourage the repair of existing equipment and lead to premature obsolescence and costs for small businesses and consumers.

Arnaud Duvielguerbigny, PU Europe Secretary General, said “the use of low-GWP F-gas use in our insulation foam is limited to a handful of applications for which alternatives are not yet developed or even in sight. Based on an impact assessment, the Commission proposal did not foresee any ban on their use.”

“The alliance stands in full support of the F-gas regulation and wishes to contribute to its revision, to ensure that the heat pump technologies fulfil the decarbonisation and electrification targets of REPowerEU,” said Francesco Scuderi, Secretary General of Eurovent. “In this context, we urge the EP to exploit the potential HFC savings coming from the current market-ready solutions in the stationary refrigeration sector that already use low-GWP and non-fluorinated refrigerants.”

"The ENVI Committee report fails to consider the decarbonisation impact resulting from a massive heat-pump vs. fossil fuel heating system replacement," said Thomas Nowak, Secretary General of the European Heat Pump Association (EHPA). “With end-users not abandoning their need for heat, every heat pump not installed will result in fossil boilers put into buildings, with a detrimental effect on the environment and the decarbonisation efforts of the EU."

Prior to the advancement of the regulation to a plenary session, the alliance urged the Environment Committee [in a letter](#) to reconsider several amendments.

“We as an alliance look forward to working with Parliament to achieve our shared ambition for building decarbonisation in Europe,” said Patten.

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APPLiA - Home Appliance Europe represents home appliance manufacturers from across Europe. By promoting innovative, sustainable policies and solutions for EU homes, APPLiA has helped build the sector into an economic powerhouse, with an annual turnover of EUR 50 billion, investing over EUR 1.4 billion in R&D activities and creating nearly 1 million jobs.



AREA - the European association of refrigeration, air conditioning and heat pump (RACHP) 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.

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/>

EPFA, the European Phenolic Foam Association includes companies that share an interest in the use of phenolic foam products within the insulation industry. The members are either producers of phenolic foam insulation resin suppliers or are companies closely linked with the industry through the provision of raw materials.

The European FluoroCarbons Technical Committee is a Cefic Sector Group that monitors legislation related to HFCs (hydrofluorocarbons), and HFOs (hydrofluoro-olefins) in the EU and at global level. Fluorocarbons are used as feedstock, as refrigerants, as solvents and as blowing agents for insulation plastic foams.

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.

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/>

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 organisations, 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.

Founded in 1999, the **Japan Business Council in Europe (JBCE)** is a leading European organization representing the interests of about 100 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, textiles and glass products. For more information: <https://www.jbce.org/>

JRAIA is the industry association representing over 160 manufacturers of refrigeration and air conditioning equipment in Japan. We, the members of JRAIA, have so far been dedicated to offering quality products to the markets of EU. JRAIA aims to promote and improve production, distribution and consumption of refrigeration



and air conditioning equipment and their applied products, as well as auxiliary devices and components, automatic controls and accessories and thereby contribute to the steady development of Japanese industry and the improvement in people's standard of living. For more information, please see JRAIA's website: www.jraia.or.jp Email: jraia-global@jraia.or.jp

PU Europe is the voice of European voice of the polyurethane (PUR / PIR) insulation industry, whose products are widely used in residential and commercial buildings with an estimated European market share of over 11%. There are more than 110 manufacturing sites in Europe accounting for more than 20,000 direct jobs. Established in 1955, **Transfrigoroute International (TI)** is the only specialist independent umbrella association for the temperature-controlled road transport industry at the European Union level. TI members include national associations representing the temperature-controlled sector, haulage companies involved with transport at controlled temperatures of foodstuffs and other goods in solid or liquid form, trailer manufacturers, manufacturers of refrigeration equipment and technical testing providers. TI membership is also open to companies providing technical assistance, insurance, damage assessment and legal services, and en-route support.