

23rd March, 2018

JRAIA's comments on F-gas Consultation Forum on 6th March 2018

The Japan Refrigeration and Air Conditioning Industry Association (JRAIA) welcomes the 3rd Meeting of the Consultation Forum established in accordance with Article 23 of Regulation (EU) No 517/2014.

Please find JRAIA's additional comments below on EPEE/JRAIA/JBCE joint position paper.

JRAIA would like to make further contributions whenever it is useful and needed and share the knowledge and experience of our member companies. We remain at your disposal and look forward to working with you throughout this study.

1. Remove barriers for low-GWP refrigerants and technologies

Until 2018, importers of pre-charged equipment may be able to use the remaining quota of 2016 or earlier, but if we consider 2021 onwards, JRAIA believe that earlier commercialization of the products using low-GWP refrigerant is necessary. Also, in RACHP sector, the use of highly-flammable and mildly-flammable refrigerants are restricted by building codes and EN standards, and these regulations are the barrier for the penetration of products using flammable refrigerants in the EU.

We believe that the timely relaxation of building codes and EN standards will be effective to remove the barriers for the transition to low-GWP refrigerants (such as R32) for residential air conditioners in the EU. In January 2018, IEC 60335-2-40 to include requirements for mildly-flammable refrigerants was published, and we believe that earlier harmonization of EN standards with IEC will accelerate further introduction of low-GWP products. On the other hand, in refrigeration sector, alternative non-flammable refrigerants with approx. 1500 or below have already been commercialized, and the European Commission will be able to promote earlier uptake of such refrigerants.

2. Phase down reduction step

JRAIA understands that the European Commission see that there will be no ultimate alternative refrigerants available to fulfill safety, phase-down goal, efficiency and economical requirement in RACHP sector. In small air conditioner, refrigerants with approx. 700 GWP including R32 and R452B are already commercially available, but ultimate alternatives are not yet. R&D activities are currently undertaken but will require time for those evaluations, simulations and testing. Therefore, JRAIA would suggest the European Commission observe R&D activities of alternative refrigerants/products in each sector, and review those contribution ratios of HFC phase-down based on the development of alternative refrigerants.

ABOUT JRAIA:

JRAIA, the Japan Refrigeration and Air Conditioning Industry Association, was originally established in February 1949 as the Japan Refrigerating Machine Manufactures Association which was thereafter reorganized in February 1969 to become an incorporated association and renamed as it is at present.

JRAIA is the trade association representing over 170 manufacturers of refrigeration and air conditioning equipment in Japan. Member companies of JRAIA have been dedicated to offering quality products to the EU market. 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 HVAC&R industry and the improvement in people's standard of living.

For more information, please see our website www.jraia.or.jp