



AREA comments to the Oko-Recherche Technical Briefings on HFCs – 17 April 2020

1) Alternatives to HFCs in split air-conditioning systems

On R32, AREA considers R32 is currently extensively used in split air-conditioning systems and is expected to grow in the future. AREA has serious concerns on the limited technical capability of non-qualified personnel in handling these alternatives. Indeed, several installations using R32, which presents flammability issues, are not properly executed in a safe manner as they are carried out by non-competent installers.

On R290, AREA has some concerns on the widespread use of R290 in single split A/C systems up to 7kW because there are severe safety concerns over the application of these systems, the quality of installation of many of this type of system and the lack of general knowledge among even qualified personnel. AREA emphasizes the need for proper training and certification for installers of R290 equipment particularly for single split systems.

Furthermore, experience has demonstrated the importance of not leaving the market regulation at end user level. The supply of these systems needs to be regulated to ensure they are only sold to installer companies who have the necessary, fully trained and competent staff to ensure the systems are installed correctly and not endangering the public. This would require a legislative modification aimed at preventing non-qualified people from taking delivery of and installing A/C systems containing R290 by restricting sales to registered installer companies. Such a change would also bring environmental benefits, since qualified personnel is able to avoid the discharge of HFCs to atmosphere.

In general, the market is offering lower GWP refrigerants, but not full alternatives. In cases like hydrocarbons, this alternative can sometimes be used as it is less potent as a greenhouse gas than many other alternatives. Moreover, the charge necessary to run a split AC equipment is lower than conventional refrigerants. It would be positive to have split systems empty of charge to prevent leaks or emissions at the installation level. Moreover, the Use of A1 should be further assessed and possibly promoted, especially for larger systems.

2) HFC availability on the EU market

The availability of HFCs in the market is stable, also due to illegal trade. However, not all refrigerants are available. Moreover, the market is smoothly going towards lower GWPs in some countries. The service and use bans of January 2020 facilitated the better availability of medium GWP refrigerants in small duty equipment where it is still permitted. With the next phase down step starting in 2021, it may be expected that some HFCs will increase price and availability may reduce.

Regarding recycled and reclaimed HFCs, like R404A, there are diverging opinions on availability. Some members reported high availability of R404A, whereas other members report only a little.

Illegal import is still an important issue at European level even if there are improvements, particularly in some Member States. The overall impression is that there is no structural improvement, but successful activities are based on individual efforts of some Member States.

EFCTC is very active in collecting reported cases with companies and national associations who directly report to them. At national level, some national associations are cooperating with the customs authorities, whereas in other countries Member States are successfully multiplying efforts:

- ◇ UK two ongoing investigations
- ◇ One recent successful investigation in Italy with support of OLAF, with customs authorities doing a good job to tackle the problem.

One of the main problems remains the lack of human resources at national level in the Member States' authorities, which are trying to be improved but not always effective. Moreover, the treatment of confiscated F-Gas is often an issue since its destruction is expensive and sometimes confiscated f-gas is kept in warehouse with the risk of being stolen or leaked.

In general, it results still easy to have access to illegal refrigerants. Beyond the traditional means of transport (road, rail or ships), also in some online marketplaces it is possible to trade illegal refrigerants. The problem of illegal trade is widespread all over Europe, and the provenience of illegal f-gas mainly from eastern Europe, but also from Africa and China. In few cases it may be foreseen that since F-Gas prices are now declining, there may be less interest in purchasing illegal f-gas in the next years.

The issue of illegal trade does not only regard the distortion of prices and the increase of criminal activities. Indeed, the quality of illegal imported of F-gases is often lower than what is required. Recent reports of refrigerant illegally imported to the UK from Turkey and marked as R404A was in fact a flammable substance of unknown type, which raised very serious safety concerns.