



## **Fgas Consultation Forum meeting**

10 September 2015

### **AREA comments**

#### **Topic A: Standards & legislation as barriers to low GWP refrigerants**

1. Are there any examples of limiting Member State legislation/codes/standards that have not been identified during the Member States Survey? (Only 7 countries said they had constraints: Austria, Belgium, France, Germany, Italy, Spain and Sweden)

In the Netherlands, from 1<sup>st</sup> January 2016 there will be national legislation that requires mandatory certification of craftsmen who work with NH<sub>3</sub>, CO<sub>2</sub> and HC's. In AREA and NVKL opinion this is no barrier but necessary to ensure safety.

2. Are there any other EU standards that are not listed in Appendix A that should be considered to identify barriers to the uptake of low GWP alternatives?

No.

3. Do you agree that the current standards for ammonia and CO<sub>2</sub> are reasonable: at EU level? At national level? - Do you agree that the key issue to be addressed are standards limiting the use of flammable substances?

If the EN 378 and EN 60335 standards are revised it means there is consensus regarding the limits of using flammable refrigerant in all member states (standardization committees). If practice in the next years shows that we can design, build and maintain RACHP systems filled with flammables without major incidents, we could decide to stretch the limits some more.

4. For flammable refrigerants, what are the key changes required to allow safe use in a wider range of applications? Which are the most important standards to change (at EU level)(at national level)?

The very first priority is to ensure competence of personnel working on RACHP systems filled with flammable refrigerants. This said, attention should not be entirely drawn on flammable refrigerants. Focus must equally be put on NH<sub>3</sub> (toxic) and CO<sub>2</sub> (suffocation, high pressure).

5. What steps must be taken to ensure the relevant standards committees do not apply overly conservative restrictions on the use of new low GWP HCF replacements? What improved data is required to support less conservative standards?

See reply to question 3. In addition, technical argumentation on energy efficiency (when applicable) should be part of the supporting data.

6. What future work in the area of standards by European standardization organisations is necessary?

The process to revise EN 13313 (competence of personnel) has started though funding is still necessary to complete the revision.

## **Topic B: Training**

1. Other than the list in Appendix A, are there any other pieces of EU legislation that are relevant to training for non-HFC refrigerants

No.

2. Do you agree that the EU legislative framework is generally sufficient as regards training needs or do you see shortcomings? Where?

AREA has always pleaded in favour of mandatory EU certification of RACHP contractors working with low GWP refrigerants to ensure harmonised competence and consequently guarantee safety of craftsmen, end-users and the public at large.

The existing framework may indeed place training requirements on employers of workers dealing with flammable, toxic and high-pressure refrigerants. Though this is a step in the right direction, it does not address all the issues resulting from an increased use of low GWP refrigerants. Notably, the existing framework:

- Is general and indirect: it does not address low GWP refrigerants specifically
- Does not set a harmonised framework on competence (i.e. common minimum requirements) and how to reach it (training/experience)

Consequently, AREA does not believe that the current EU legislative framework is sufficient and still prefers mandatory certification of craftsmen working with alternative refrigerants (just like the F-gas-model). People and companies are used to this system and it should be upgraded/complemented with competences for alternative refrigerants.

3. Is there a further need for legislation at the Member State level in view of the rising importance of low GWP alternatives?

Some Member States are already taking that route (e.g. the Netherlands, see reply to question 1 or topic A). However, we do not believe that further national legislation is needed as it would increase divergences across the EU. An EU harmonised framework is preferable to ensure uniform competence.

4. Do you agree that ammonia training is already sufficiently widespread?

This is what is generally reported by AREA members.

5. For CO2 HCs and A2Ls:
  - a. Is there sufficient basic training material already available (e.g. REAL Alternatives)?  
Yes
  - b. How do we get more training centres equipped to deal with these refrigerants?  
Mandatory certification certainly would have an effect. National associations representing contractors also have a role to play in cooperation with national

authorities ((model followed in the Netherlands), notably to advise them and initiate projects.

- c. How do we encourage more engineers to take extra training?

Mandatory certification

- 6. How can we best assure that existing training gaps may be filled – action by service personnel associations at EU level/MS level; action by equipment producers/market; projects like REAL alternatives; others?

Mandatory certification would de facto help fill training gaps. Equipment producers can also play a role. Big end-users (e.g. retailers) can also have an impact, notably by requiring that only duly trained technicians work with their systems.

### **Topic C: Green public procurement**

- 1. How can GPP best be used to promote climate-friendly alternatives to HFCs, thus supporting the HFC phase-down while maintaining energy efficiency ambition?

Ecodesign requirements must be integrated into the specifications. As regards criteria, energy efficiency should always be a key criterion in the choice of the solution used. This aside, low GWP solutions are available but they are not always the cheapest proposal. Yet the price is still unfortunately the main driver.

- 2. Which are the most promising target areas for the use of GPP in Europe, as regards replacing HFCs with low GWP alternatives?

Heat pumps for domestic use have great potential.

Brussels, 7<sup>th</sup> September 2015