

Please allow me to accentuate two points that were of importance to EHI members with regards to standards, training and GPP, as discussed during the F-Gas Regulation implementation stakeholder meeting on 10 September 2015:

- 1.) In the overview of legislations and standards that may pose barriers for the uptake of alternative refrigerants, it is important to add also the **General Product Safety Directive**, which requires manufacturers and importers of equipment to place only safe products on the EU market;
- 2.) Regarding GPP, we recommend that if any initiatives are taken, criteria should be based on several parameters and not on the GWP value of the refrigerant. Energy efficiency and CO2 equivalent refrigerant charge (kg x GWP) are the main environmental parameters. Initiatives should also be coherent with other GWP initiatives, such as the TEWI approach under the GPP for water based heaters.

I hope you can take these concerns into account.

With best regards,

Vanessa Knezevic

