

EPEE'S COMMENTS IN VIEW OF THE EU CONSULTATION FORUM OF 10 SEPTEMBER 2015

The European heating, cooling, refrigeration and heat pump industry represented by EPEE supports the EU F-Gas Regulation's objective to reduce HFCs consumption. EPEE has established a Low Emissions Task Force to assess the barriers that currently prevent the uptake of relevant lower emissions technologies. In this context we cooperate with other sectors, as well as public authorities, in order to overcome these barriers.

In recent months EPEE has actively cooperated with consultancies in developing a "gapometer", a tool to evaluate what needs to be done to meet the phase down targets in the F-Gas Regulation. EPEE has provided input regarding existing barriers and limits due to EU, national and international standards and codes, most of which are reflected in the European Commission briefing papers.

EPEE has provided specific communication tools (guidance documents, factsheets, and videos) to enhance industry's awareness and understanding of the new F-Gas rules and its new obligations and responsibilities.

EPEE also believes in global action to tackle and reduce HFC consumption collectively with other regions in a way that is economically viable, compatible with high safety standards, and continues to observe energy efficiency as a fundamental objective at EU level (*please see [here](#) the EPEE pledge presented ahead of the UN Climate Conference in September 2014*). EPEE is engaged at international level within the UNEP Climate & Clean Air Coalition (CCAC) HFC initiative and participates in the Montreal Protocol discussions on a global phase down of HFCs.

I- Topic A: Barriers in legislation & codes:

- 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)**

We would like to emphasize that especially regarding the use of flammable refrigerants there are local building codes and fire brigade safety instructions that may pose barriers. As this is a regional or local matter, more time will be needed to map out these potential requirements especially for commercial and public buildings.

- 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?**

EPEE suggests adding the Ecodesign Directive and its implementing regulations which require minimum energy efficiency levels for products placed on the EU market. Some low GWP alternatives may not be able to achieve those minimum requirements. Therefore, some Ecodesign implementing regulations set lower energy efficiency targets ("bonus") when very low GWP fluids are used. EPEE has already expressed strong concerns about this policy because it is in contradiction with the optimization of energy efficiency. Ways must be found to achieve the HFC phase down without sacrificing energy efficiency.

We recommend to add also the General Product Safety Directive to the overview. This Directive complements sector specific legislation and is the basic requirement for manufacturers and importers to place only safe products on the EU market.

See also our attached tables with a summary of relevant legislation and standards

3. Do you agree that the current standards for ammonia and CO₂ 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?

EPEE agrees that the current standards for ammonia and CO₂ are reasonable and that the key issue to be addressed is related to the use of flammable substances.

The main barrier for further uptake of CO₂ is the need for additional trained and qualified installers and service technicians (see AREA position).

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 standards regulating refrigerants (EN378) as well as EN60335-2-40 and EN60335-2-89 are the key standards to be changed and they are currently under revision.

As mentioned above, the barrier for flammable refrigerants for commercial and public use buildings is also in national legislations, and local building codes or fire safety rules, which will need to be adapted.

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?

Standards currently under revision such as EN378 and IEC/EN60335-2-40 shall be approved as fast as possible to ensure that new work can be started to accelerate the further uptake of lower GWP refrigerants. The revision work of IEC/EN60335-2-89 has just started and is also important due to the impact of refrigeration sector in the HFC phase down

Companies are free to place products on the market which go beyond the guidance of standards. On the other hand, companies are obliged, for safety reasons, to also add additional precautions which are not foreseen in the standards, such as the possible risk for persons servicing the equipment.

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

It is imperative that organisations work together on gathering the right data to make informed decisions on how to amend standards. EPEE emphasises that this process is an open, multi-

stakeholder process and that SMES are able to receive support from the EU commission (see http://ec.europa.eu/growth/smes/access-to-markets/standardisation/index_en.htm.)

II- 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

As mentioned above, the General Product Safety Directive should be added, requiring manufacturers and importers to place safe products on the EU market, as well as to inform consumers of the risks associated with the products they supply.

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

The current EU legislative framework is rather comprehensive as regards training. EPEE does not believe that more legislation would help overcome the gap in training - rather, the EU should work to enable more training.

EPEE has been promoting the standard EN13313 which sets minimum requirements for the skills of installers and has introduced a request to elevate it to ISO level. In addition, the EN13313 is currently being revised.

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

EPEE supports a harmonised approach towards refrigerants and as such would always support EU legislation rather than disparate national legislation. Member States should rather focus resources on raising awareness of the importance of training and the exchange of best practices with a focus on training future generations (i.e. schools) who will be working with lower GWP solutions.

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

Ammonia is already used in the industrial refrigeration sector in many years and we are not aware that more widespread training is required.

5. For CO2 HCs and A2Ls:

- a. Is there sufficient basic training material already available (e.g. REAL Alternatives)?**
- b. How do we get more training centres equipped to deal with these refrigerants?**
- c. How do we encourage more engineers to take extra training?**

EPEE is not in a position to comment on trainings regarding specific refrigerants. However, EPEE agrees that there can never be enough communication and material available. Such materials should be easy to handle, update, and communicate on. To that end, EPEE develops and supports the use of modern communication tools (video, visuals).

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?**

EPEE calls for more investment into actual trainings and communication tools. Over the last year EPEE has developed a number of communication tools - including [Frequently Asked Questions](#), [Factsheets](#), videos and a [dedicated "F-Gas Bookshelf"](#) - made available online and where appropriate translated into different EU languages.

In addition, EPEE has been in contact with schools and companies and organised several events to raise awareness of the F-Gas rules in Brussels, key EU Member States, and at the international level.

III- 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?**

Governments should take a technology-neutral approach in both their policy development and public procurement. When a government is faced with a refrigerant choice in their procurement, it should always base its assessment on the best available technology for that particular system:. GWP should never be the only parameter for GPP. Other criteria need to be taken into account such as refrigerant charge safety, energy efficiency, environmental impact, and affordability.

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

As the F gas regulation includes a list of product bans, the GPP may help to accelerate the uptake of alternatives earlier than the dates mentioned in the regulation, to encourage early adopters.