

Dear all,

Many thanks again for giving us the opportunity to participate at the consultation forum last week.

Please find enclosed our input that we think is on top of what has been presented last week.

Best regards and many thanks in advance.

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#### 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)

In France the regulation applicable to public buildings forbids the use of A3 refrigerants in [clause CH 35](#) applying to comfort ventilation and thus air-conditioning. Furthermore CH35 § 4 use improperly the word “refrigeration” for applications under air conditioning. This has initially led the safety commission in 2008 to extend requirements applicable to cooling comfort to process equipment like food display cases containing R290. The above mentioned ambiguity about the term refrigeration has been waived since then by the safety commission, still many users believe that the regulation applicable to public buildings forbids the use of R290 as refrigerant while it is not. **Rules applied locally by safety commissions remain rather vague and leave room for misinterpretation.** This constitute a serious hindrance for flammables.

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?

[Not to our knowledge](#)

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?

[No specific comment](#)

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)?

[Harmonize the flammability definition in the standards. e.g. the definition of flammability for PED directive \(based on GHS\) is not same as for EN378. This creates confusion where some refrigerants are classified non-flammable for PED where they are flammable for the application.](#)

[Mismatch between ISO 817 refrigerant and CLP1272/2008.](#)

How new refrigerant proposals from chemists are legally listed flammable according ATEX directive? Should It be on the Transport rule listing CLP1272/2008?

Common understanding of the Application/OEM perspective, requirements (i.e: Atex zone and equipment categories required accordingly) - Ambiguity exist on the categories required by the OEM products to fit with the end user application

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?

Safety requirement; e.g. for electrical components, the requirements in EN378 for highly flammable refrigerants (A3) and for mildly flammable refrigerants (A2L) are the same – A2L might be able to enjoy a lower safety requirement.

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

Harmonization of flammability definitions over all applicable standards, not only within refrigerant applications per se.