



Current standards for ammonia and CO₂ are reasonable. CECED would like to remind that CO₂ is a low toxic gas and not “non-toxic” as mentioned in the briefing paper and during the presentation on 10th September.

It is indeed on flammability that revisions are needed and this is currently under preparation in EN378 and IEC/EN60335-2-40 and IEC/ISO60335-2-89. Difference is made between different classes of flammability as accepted under ISO817 (lower flammable (class 2L), flammable (class 2) and higher flammable (class 3 refrigerants)).

Above all, it is key for producers that the professionals handling our appliances containing the gas are trained and qualified to ensure full safety of consumers and homes.

Q4. 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 generic standard (EN378) as well as product standards EN60335-2-40 and EN60335-2-89 are the key standards to be changed and they are currently under revision.

We also note that there are some legislations that refer to old versions of the standards (ex: old versions of EN 378) which oblige manufacturers to comply with old standards while new version of the same standards are already available. This increases the patchwork of legislation within the EU and distorts the EU internal market.

Q5. 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?

The working group of TC182WG6 already identified the work items needed for further relaxation of different types of refrigerants. Now working groups need to be set up to make progress on these work items.

Q6. What future work in the area of standards by European standardisation organisations is necessary?

Data collection and risks assessments are critically needed to ensure the future work of the European standardisation bodies. Safety of consumers should prevail.

Topic B: Barriers related to training

Q5. 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?

It is crucial for equipment manufacturers that the professionals handling our appliances containing the gas are trained and qualified to ensure full safety of consumers and homes. In this respect, training and qualification for professionals handling our equipment, containing alternative refrigerants, is essential

Awareness raising campaign would be beneficial.

Topic C : Green Public Procurement

Q1. How can GPP best be used to promote climate-friendly alternatives to HFCs, thus supporting the HFC phase-down while maintaining energy efficiency ambition?

GPP should not only be based on GWP criteria, but also on the charge expressed in CO2 eq and energy efficiency.

A patchwork of GPP requirements between the 28 Member States should be avoided to ensure the coherency and the well-functioning of the internal market.

Q2. Which are the most promising target areas for the use of GPP in Europe, as regards replacing HFCs with low GWP alternatives?

A possible approach could be to refer to the bans of the F gas regulation and GPP could encourage an earlier changeover by supporting early adopters.