The Voice of European Air-Conditioning, Refrigeration and Heat Pumps Contractors

Revision of the F-gas Regulation

AREA comments further to the consultation meeting

24th May 2021

AREA would like to comment on the F-Gas review and impact assessment's preliminary results presented at the consultation meeting on 6th May. These comments follow on from the proposals we put forward in March. They are also complementary to the joint industry statement co-signed by AREA and several other RACHP industries.

1- The costs of extending the F-gas training and certification requirements scheme to alternatives

We welcome the proposals currently under evaluation and take note of the broad support expressed by the majority of stakeholders, whether in their reply to the consultation questionnaire or during the consultation meeting.

Some concerns were raised on the costs associated with such an option.

First, we firmly believe that ***administrative costs*** would be marginal since the extension would add modules to an already established certification scheme and structure. The situation is therefore very different to 10 years ago, when such frameworks were originally being set up.

Second, although we are not in a position to give precise estimates, we do not deny that an extension of the certification to alternatives would generate ***operational costs*** which would have to be borne by our contractors. For companies working with flammables daily, such training and certification costs would overall be marginal. Moreover, we see these costs as a worthwhile upskilling investment given the market position that alternative refrigerants are to take and mindful of their safety issues. Training and certification costs will be largely compensated by the higher safety standards provided which will imply with a lower cost to keep the unit running safely and efficiently. The same logic applies from the users' point of view, as they will certainly gain from more highly qualified technicians in terms of installation and maintenance costs.

Overall, we are convinced that the benefits in terms of competence, safety, efficiency and ultimately facilitation, largely outweigh the costs.

Worries were also expressed that compulsory installation and maintenance of alternative refrigerants equipment by certified technicians would act as a deterrent. This would imply that the current absence of such an obligation acts as an incentive. However, if that was indeed the case, then surely by now we would see a much higher share of F-gas certified technicians competent on alternatives and the insufficient number of competent technicians would not have been identified as an obstacle to the

uptake of alternative refrigerant solutions. Certification is on the contrary a guarantee of competence and therefore of safe and efficient equipment's operation.

Several studies have concluded that the lack of skilled, trained operatives has been a barrier to wider uptake of flammable alternative refrigerants, so it is logical that by ensuring we have a properly trained and competent workforce across the sector then we are de facto removing those same barriers.

2- Maintaining refrigerant's choice in support of energy efficiency

We would like to warn against the risks of an approach that would arbitrarily prohibit certain refrigerants' use on the sole basis of their GWP or of their synthetic nature. The fact is that there is not one refrigerant or even family of refrigerants that can be considered as the best solution for all RACHP applications and operating conditions. Contractors must ultimately be able to choose from a variety of natural and synthetic options according to users' needs. From that point of view, we cannot stress enough how much the 'energy efficiency first' principle must always prevail so that measures aiming at decreasing direct emissions through lower GWP do not result in an indirect emissions' increase because of a negative impact on the energy efficiency of the system.

With this in mind, we have doubts on the solidity of some of the underlying assumptions presented, notably with regards to heat pumps as stationary air conditioning equipment. The impact of limiting F-gas use in heat pumps must be measured considering the important role that heat pumps will play in the EU's decarbonisation and in support of specific targets in some regulations, such as Ecodesign, EED, EPBD and RES.

For other points, see the joint industry statement co-signed by AREA.