EHPA position on the revision of the F-Gas regulation  
26.11.2013

EHPA, as the representative of the European heat pump industry, welcomes the efforts of the European Commission, Parliament and Council members to reduce greenhouse gas emissions to the atmosphere.

In particular we support:

- a sound definition of heat pumps, fully in line with other EU legislation (such as the EPBD), including reversible units and describing the product in a technically accurate way;
- a correct definition of hermetically sealed equipment, precise and consistent with international technical standards;
- the inclusion of pre-charged equipment in the phase down mechanism. Replacing the ban by a tracking system safeguards the integrity of the system while at the same time avoids an unnecessary complex and costly procedure, potentially even harmful to the environment.

We see these points as valuable improvements making the measure more technically sound.

Yet, we still have major concerns with regards to any potential additional product bans (Annex III), especially when the scope is not properly defined. As such, a proposed ban on split air conditioning systems or chillers could also affect heat pumps. That would completely dilute having a heat pump definition in the Regulation. But foremost it would have a very negative effect on the heat pump technology which today is considered as being best in terms of energy efficiency (according to the recently adopted Ecodesign Regulation). One approach to overcome such confusion and insecurity would be to avoid setting up bans for these product groups altogether. We are convinced that the current phase down scenario is sufficient to reduce the amount of refrigerant used in the market. It sets an appropriate signal to industry to increase the development speed for products using lower GWP refrigerants.

We remain at your disposal if you would have any further questions.

About EHPA: The European Heat Pump Association (EHPA, www.ehpa.org) promotes awareness and proper deployment of heat pump technology in the European market place for residential, commercial and industrial applications. EHPA has 107 members from 22 European countries representing the majority of actors in the European heat pump industry. The association aims to provide technical and economic input to European, national and local authorities in legislative, regulatory and energy efficiency matters. All activities are aimed at overcoming market barriers and dissemination of information in order to speed up market development of heat pumps for heating, cooling and hot water production. It is the declared aim of the association to make heat pumps a core technology in the development towards a more energy efficient, RES-based, sustainable energy system.