

**EPEE & AFCE SPECIFIC POSITION ON AMENDMENT 66
AS ADOPTED BY THE ENVIRONMENT COMMITTEE
AND DUE TO BE VOTED ON AT PLENARY ON WEDNESDAY 31 MARCH**

EPEE and AFCE are strongly against this amendment. It calls on the European Parliament as a whole to reject Amendment 66 at the plenary vote on 31 March. We attach below a detailed analysis of the consequences of the amendment, as well as the key argumentation opposing the proposed amendment.

Amendment 66
Article 7, paragraph 3 a (new)

3a. The use of fluorinated gases in the production of free-standing, ready-to-plug refrigerating and freezing equipment shall be prohibited from 1 January 2008.

Justification

The use of hydrocarbons is already state of the art in household refrigerators and freezers both as a refrigerant and in the insulation. Furthermore, owing to the small quantities of refrigeration involved, there are no safety reservations about the use of such equipment containing hydrocarbons as refrigerant.

EPEE and AFCE ARE AGAINST THE ADOPTION OF THIS AMENDMENT FOR THE FOLLOWING REASONS

1 Scope wider than originally considered

EPEE & AFCE are of the opinion that while until now this has been understood to be a pure domestic fridge ban (the amendment justification refers specifically to this application only) it in fact applies to many more applications such as display and storage cabinets and cases used in shops, restaurants and canteens, drugs and blood/organ storage cabinets use in hospitals, blood banks and operating theatres, drinking water fountains and vending machines. (See Annexe I to this document which set out a non-exhaustive list of applications covered)

This means that this ban will have a much wider knock-on effect on the Refrigeration and Air Conditioning (RAC) market than previously thought. Our position is that these bans on the use of HFCs go against the agreed approach of emission reduction through containment.

2. Arguments against this proposed ban

EPEE & AFCE believe:

1. In the case of the applications covered by Amendment 66, this specific ban would be a **disproportionate way to reduce f-gas emissions as the gases in these applications are contained in hermetically sealed systems** (i.e. systems are airtight and therefore fully emission free). Refrigerant is recovered for re-use during any rare service operation of this sealed system (approx. 2% during lifetime). Under the Waste of Electrical and Electronic Equipment (WEEE) Directive both refrigerant and insulation foam gases must be recovered at end of life. This is all in keeping with the 'containment' objective of the proposed Regulation.



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2. The **biggest contribution to global warming** from 'mains plug connected' refrigeration products comes **from the energy used during product life**. The improvement in energy efficiency from HFC is approx. 10% over a product life compared to hydrocarbon gases, as demonstrated by a number of scientific studies. **Banning HFC could thus have a negative impact on global warming by the increase in CO2 emissions from electricity generation**. It would also prevent the future development of possible blends of gases (for instance HFC/HC) which may provide even lower CO2 emissions.
3. For a number of refrigeration products **HFC** was chosen as the **preferred replacement for the earlier banned CFC and HCFC ozone-depleting gases, for reasons of energy efficiency and safety**. For instance, hydrocarbon gases, as chosen by many European manufacturers, cannot be used in US factories neither in French public buildings due to worker and consumer safety regulatory regimes and air pollution requirements (VOC's). The effect of an end-use ban on HFC would be to stop the sale of such products. This would have a major impact on jobs for manufacturers and their distribution partners, and could create a non-tariff trade barrier.
4. For 'plug connected products' which use in excess of 150g of refrigerant charge the European safety standard EN.60335-2-24 does not allow the use of hydrocarbons on safety grounds (explosion risk). Amendment 180 would not allow HFC to be used either. It would thus be impossible to manufacture such products, to the detriment of all end users.
5. This amendment will also have serious negative impacts on the energy efficiency of fridges. This is because the ban will also apply to the HFC blowing agent used in the manufacture of the insulating foam for the walls of refrigerators. The most energy efficient foams available today require HFC blowing agents. As the EU seeks improved energy efficiency in appliances, the lowest cost approach to achieving this for refrigerators is via HFC-based foam technologies. This amendment removes that option. We are opposed to the removal of any technologies that negatively impact energy efficiency.

Given these factors, EPEE & AFCE are pushing for the European Parliaments to reject Amendment 66 at the plenary vote on 31 March.

ANNEX I
NON-EXHAUSTIVE, LIST OF HERMETIC PLUG IN TYPE EQUIPMENT
COVERED BY AMENDMENT 66

EPEE & AFCE have looked at the consequences of Amendment 66 and have drawn up the following non-exhaustive, list of hermetic plug in type equipment which will be caught by amendment 66.

They are:

1. Non-European Domestic equipment
2. Service Cabinets used in the following types of applications
 - a. Food storage, Med. Temp.
 - b. Freezers
 - c. Drinks & cans dispensers
3. Ice Makers, Pubs Clubs Restaurants Hotels and Bars
4. Portable Air-conditioners
5. De-humidifiers
6. Small integral unit display cases, these can be up to 3 metres in length and are in use in corner shops small food stores and supermarkets, restaurants and
7. Cafes serve over units and virtually anywhere you find food.
8. Dough Retarders for the Bakery industry, not just small bakeries
9. Pod Coldrooms with integral plug in pod coolers.
10. Environmental Chambers
11. Standards Chambers
12. Laboratory Chambers
13. Ice Cream Cabinets
14. Ice cream Sales Vans
15. Delicatessen Cases
16. Cream cake & chocolate display and storage cabinets and cases
17. Restaurant & Hotel Chilled Breakfast Bars
18. Wine Storage Cabinets
19. Wine coolers
20. Beer and Lager Coolers, the under bar or in cellar instant cooling type
21. Cutting Oil Coolers for Lathes and other Machine tools
22. Hydraulic oil Coolers
23. CNC Machine coolers
24. Drugs Cabinets
25. Blood Banks
26. School, Factory and office Canteen Equipment
27. Drinking Water Fountains
28. Bottled Water Coolers for Works or Offices
29. Bottle Shelves
30. Drinks Machines
31. Vending Machines including combined hot and cold food or drinks dispensers
32. Back Bar Displays and Storage Cabinets
33. Wine Coolers with Bottles on Optic measures