



## **EFCTC position      Eco-Design preparatory study for air-conditioning systems - ENTR Lot 6**

Brussels, 30 August 2012

The European Fluorocarbon Technical Committee (EFCTC), representing the producers of fluorocarbon refrigerants, thanks ARMINES for the final preparatory study on the air-conditioning side of ENTR Lot 6.

While the study and reports are thorough in most aspects, we are concerned in particular by the proposed banning of refrigerants with a GWP > 675 from 2019 onwards and disagree with the reasoning to reach this proposal.

The proposal to ban refrigerants is premature and based on incomplete analysis for new refrigerant availability. LOT 6 addresses the cooling function for air-conditioning, with the heating function e.g. for reversible air-conditioners being addressed by LOT 1. This lack of holistic analysis may be unhelpful when determining the potential optimum refrigerants for the medium to long term.

In addition, it is assumed that class A2L refrigerants will be acceptable throughout the EU for all the air-conditioning applications covered. If this is not justified then a GWP > 675 limit may have the effect of preventing the use of energy efficient safe refrigerants, with GWPs > 675 for air-conditioning applications where they are necessary.

While EFCTC agrees that it is important to encourage the adoption of lower LCCP systems, the selection of a 675 GWP cut-off is arbitrary, as it makes assumptions about the potential EU wide use of such refrigerant and by an arbitrary date of 2019.

EFCTC has publicly stated its support for a consumption cap and phase-down of HFCs, to be implemented under the F-Gas Review and we believe this is gaining wide support. In our opinion, the LOT 6 conclusions would have been significantly improved by recognising and supporting a consumption cap and phase-down as the most appropriate approach to drive change, while taking into account the uncertainties about future refrigerant availability, safe use and Member State differences.



A consumption cap and phase-down would underpin the broad trend to implement lower GWP refrigerants whilst maintaining or improving energy efficiency, but does not require the imposition of an arbitrary GWP cut-off, or make strict assumptions about the use of A2L refrigerants and ensures that there is no dislocation due to an arbitrary deadline to impose a GWP cut-off.

Campbell Nick J  
Chairman EFCTC  
[nick.campbell@arkema.com](mailto:nick.campbell@arkema.com)

Marleen Pauwels  
Cefic Manager Fluorinated Chemicals  
phone: 32 2 676 7247  
e-mail: [mpa@cefic.be](mailto:mpa@cefic.be)  
<http://www.cefic.org>  
<http://www.fluorocarbons.org/>