



Time to hold the Commission to account on the F gas Regulations

Those in the UK who have spent extensive time and money on complying with the obligations – organising training courses, applying for company certificates, educating their customers, setting up asset registers and recording mechanisms – will be pleased to see that all of these investments are beginning to pay off. Early indications are that F gas emissions in the UK have decreased in the last 2-3 years in particular.

Whilst this is good news for British industry, the Commission's consultation as part of their review of the effectiveness of the Regulations is being conducted against a background of a much bigger picture – a global one in fact. So the questions it is asking are focused much more on what additional new policies should be introduced to achieve radical reductions in emissions rather than on extending what has worked well with existing regulations, which needs to be more thoroughly applied across Europe.

ACRIB's draft response to the Commission on behalf of UK industry tries to redress the balance. It has been prepared with input from key trade associations and professional institutes to highlight the most effective policy measures based on evidence of effectiveness in the UK to date.

Before a final answer is delivered to the Commission ACRIB would appreciate comments from the wider industry – as well as giving you the opportunity to make your own comments direct to the commission, perhaps supporting some of the points that will be made by ACRIB. The full ACRIB comment is available at www.acrib.org.uk/fgasreview for you to read in detail and comment on by 1st December, but in summary the main points are as below:

ACRIB would like to encourage the Commission to focus future much needed policy measures on those which support the progress already achieved by industry in reducing emissions ie:

- Improve legislation, compliance and enforcement in all countries
- Acknowledge the evidence that demonstrates containment is working, and that regulations need only technical adjustment and inclusion of additional requirements to make further savings.
- Reassure businesses that they should continue to invest in compliance and containment. This consultation is sending out a message that an F Gas phase down is imminent and is therefore undermining actions to maximise compliance with f gas and achieve emissions reductions.

The key policy options necessary to achieve this are:

1. The introduction of single national mandatory individual registration and company certification scheme members
2. That refrigerant suppliers be responsible for ensuring that only appropriately certified individuals can be supplied with F Gas refrigerants.
3. An awareness campaign aimed at equipment operators covering enforcement in combination with a 'non-compliant' operator reporting service.
4. Member states to report to the Commission on compliance levels and to ensure more robust auditing of all company and individual certification authorities.
5. More active enforcement and increased policing of operators' legal obligations under the Regulation to take place

UK industry is concerned that in many member states a failure to introduce national legislation within the require timescales and low levels of enforcement where national regulations exist have undermined the potential of these Regulations to achieve reductions in emissions and is an affront to environmental responsible companies and individuals that have invested in compliance.

The Commission needs to be more vigilant in ensuring full compliance by all member states. In addition, minor adjustments at national level on enforcement mechanisms would have a major impact on effectiveness ie restricting the sale of F gas refrigerant or equipment designed to contain F gases to those suitably qualified, harmonisation with relevant industry standards including EN 378 and EN 16084 and improved technical specifications to prevent leakage from new equipment and associated components.

Finally in order not to compromise indirect emissions (which make up the vast majority of this sector's contribution to global warming), industry experts should be able to select the widest possible choice of refrigerants taking into account efficiency, safety, technical feasibility and containment issues. Legislation which forces the use of certain, as yet unproven, refrigerant options could compromise any of these criteria with serious consequences.

Whether you agree or disagree we would welcome a wider debate – but don't delay. Final comments must be submitted to the Commission by 19th December 2011. Draft proposals are expected to be issued in early 2012 and will take into accounts the results of the consultation.

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Issued by the Air Conditioning and Refrigeration Industry Board representing Association of Refrigeration Contractors, Association of Manufacturers of Domestic Equipment, British Frozen Food Federation, Cambridge Refrigeration Technology, Chartered Institution of Building Services Engineers, Food Storage and Distribution Federation, Federation of Environmental Trade Associations (incorporating BRA and HEVAC), Heating Ventilating Contractors Association RAC Group, Institute of Refrigeration.

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