



Brussels, 13 December 2012

**EHI position
on the European Commission proposal (COM 2012/643)
for a regulation on fluorinated greenhouse gasses**

Background and position

EHI, the Association of the European Heating Industry, represents manufacturers of all heating systems, including heat pumps. From this perspective, EHI has been closely following the activities related to the revision of the regulation on fluorinated greenhouse gases (F-gases regulation EU 842/2006). EHI also provided feedback during the open consultation organised with this occasion.

EHI welcomes the European Commission proposal for the revision of the regulation, in view of strengthening EU's climate action related to the elimination of hydrofluorocarbons (HFCs) with high global warming potential (GWP), where feasible, from a health and safety, energy efficiency, technological and economic perspective .

EHI wishes therefore to make a series of recommendations for improvement of the new regulation text, taking into account the important role that heat pumps have in increasing the energy efficiency and the path to the decarbonisation of the heating and cooling sector.

Definition of “hermetically sealed” should be based on existing European standards

EHI recommends the modification of the definition of a “hermetically sealed system” (Art. 1 (7)) based on existing standards. The EN378-1:2012 defines hermetically sealed as "permanently closed" achieved by welding, brazing or otherwise making them tight. A connection tested for tightness with a leakage of less than 3g of refrigerant per year at a pressure of 0,25 x PS and secured against improper handling (opening) by requiring special tools, using glue, capped valves or similar is considered hermetically sealed.

Today's heat pumps are equipped with Schrader valves (capped valves) for testing, maintenance and dismantling. They enable a safe evacuation of the refrigerant at the end of life of the unit and they enable an efficient maintenance of the unit during operation.

Pre-charging of equipment should be permitted

Art. 12 (1) of the proposed regulation prohibits heat pump equipment from being pre-charged with HFCs when placed on the market or made available to the end-user for first installation. Charging of heat pump

equipment is however required for the final manufacturing test. It will then have to be removed again and will be contaminated with compressor oil or waste. Before it can be used again, it would need to be sent back as waste to the gas suppliers for cleaning. An obligation for complete de-charging before placing of the market would involve unnecessary additional handling of HFCs (and therefore leakage risks). Moreover, subsequent charging on site of a pre-charged equipment involves a lower amount of HFCs and could be tested under vacuum conditions, therefore avoiding additional HFCs emissions (from tubes, filling device...).

Certification of staff only for maintenance / service on refrigerant circuit

EHI fully supports the necessity for appropriately trained and certified personnel handling HFCs. The association only recommends a clarification of the Art. 8 requirements, in such a way that HFCs training / certification is only required for the personnel handling of the refrigerant circuit. Such certification should not be necessary for the installation / maintenance / repair of other components of the hydraulic or electrical side of the heating system. This possibility would ensure that additional costs are avoided ("double staff" for heat pump and heating system).

EHI, the Association of the European Heating Industry, represents and promotes the common interests of 35 market leading company members in the European heating sector, which produce advanced technologies for heating in buildings, including: space heaters (boilers, electric and fuel driven heat pumps, micro-cogeneration), heating controls and components, heat storage and heat emitters (radiators, surface heating and cooling systems), renewable energy systems (solar thermal, geothermal, biomass). In addition, members comprise 13 national industry associations from the EU Member States, Liechtenstein and Switzerland. The industry invests massively in research and development in order to create technically advanced, safe and energy efficient heating systems.