



Brussels, 19th June 2013

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F-Gases Regulation Revision:

EP ENVI Committee proposal would put EU Single Market at risk

- **The suggested ban on the pre-charging of equipment would give companies based outside the EU a competitive advantage over those based within the EU.**
- **The suggested ban on stationary air conditioning and the suggested phase-down is too ambitious and will hamper heat pump technology.**
- **The suggested export ban of equipment would distort further European manufacturer's competitive position.**

On 19th June, the ENVI Committee voted on their proposal for the revision of the EU F-Gas Regulation.

Says Luigi Meli, CECED Director General: *"The proposal to leave Art. 12 (ban on pre-charging of equipment) unchanged is disappointing. The Council will now have to solve the problem of accounting for the total amount of F-Gases (contained also in imported equipment) placed on the European market.*

We acknowledge the need to administer the amount of gas that is inside pre-charged equipment to ensure that the F-Gas quota system will function properly. Otherwise a situation would arise where equipment would be produced and filled without restrictions outside the EU and then imported into the EU, and thus not falling under the phase down target for F-Gases."

The proposed F-Gas bans on stationary air conditioners will be counter-productive and create a variety of problems for users and industry. Most stationary air conditioners that are installed in buildings have both cooling and heating functions. Therefore a ban on stationary air conditioning will also result in a prohibition of heat pump applications in the building sector. Heat pumps are critical to reduce energy consumption in the EU.

Continues Luigi Meli: *"Heat pump technology is essential to ensuring the EU reaches its energy efficiency targets. Heat pump tumble dryers, heat pump water heaters and heat pump space heaters are typical examples. Without F-Gases, heat pumps cannot achieve their outstanding energy efficiency performance and meet*

internationally required safety requirements. A well-constructed phase down scheme should recognise the energy savings that heat pump technology can offer and allocate a sufficient quota for further development.”

Finally, European based production and export of domestic refrigerators and freezers that contain hydrofluorocarbons (HFCs) should not be prohibited. In some non-European markets HFCs are the only legally allowed refrigerants. Therefore the proposed export ban could potentially lead to delocalisation of European based production.

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About CECED: CECED represents the household appliance manufacturing industry in Europe. Its member companies are mainly based in Europe. Direct Members are Arçelik, Ariston Thermo Group, BSH Bosch und Siemens Hausgeräte GmbH, Candy Group, Daikin Europe, De'Longhi, Electrolux, Fagor Group, Gorenje, Indesit Company, LG Electronics Europe, Liebherr Hausgeräte, Miele, Philips, Samsung, Groupe SEB, Vorwerk and Whirlpool Europe. CECED's member Associations cover the following countries: Austria, Belgium, Bulgaria, Czech Republic, Denmark, France, Germany, Greece, Hungary, Italy, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Spain, Sweden, Switzerland, Turkey and the United Kingdom.