



Brussels, 11 December 2018

Better enforcement of the EU F-Gas Regulation swiftly needed

Dear Sir or Madam,

I am writing on behalf of EPEE, representing the refrigeration, air-conditioning and heat pump industry in Europe, and three leading associations in the heating, ventilation, air conditioning and refrigeration (HVACR) sector – EFCTC, AREA and ADC3R.

As growing illegal trade of refrigerants is reported, our associations have called upon all market players to only buy refrigerants from reputable sources in order to ensure the safe and efficient operation of HVACR equipment. In case of accidents which may result from the use of unknown substances contained in illegally imported containers or cylinders, installers will ultimately be responsible. Illegal imports and the consequent placing on the market of such refrigerants do not only pose a major reliability and safety hazard for installers and users but also put at risk the achievement of the ambitious CO₂-equivalent reduction goals set by the F-Gas Regulation.

Moreover, the distribution channel of refrigeration fluids has made substantial investment in both hardware (filling equipment, cylinders etc.) and services (recovery & reclamation), enabling the responsible use of F-gases. This investment is put at serious risk by the increase of illegal offerings of F-Gases.

Our associations have supported the F-Gas Regulation and the transition towards lower GWP refrigerants right from the start. We cannot afford such loopholes in the implementation and lack of coordinated enforcement, especially now as the world has agreed on a global phase-down of HFCs under the Kigali Amendment which will enter into force in those countries that have ratified it in less than three months.

Authorities are ultimately responsible for the proper enforcement of the F-Gas Regulation and we call on all actors - including EU and National competent authorities - to also play their part in enforcing stricter controls at EU borders. The European Commission is working on this issue as a priority and we intend to work with them over the coming months to help accelerate progress.

We remain at your disposal should you have any questions, and would like to request a meeting to discuss this issue further at your convenience.

Yours sincerely,

Andrea Voigt, Director General
EPEE