



Brussels, Thursday, 23 April 2020

This is a response from the European Partnership for Energy and the Environment (EPEE) to the Inception Impact Assessment on the revision of Regulation No. 1005/2009 (Ref. Ares (2020)1782671 - 26/03/2020).

EPEE notes that the Commission evaluation of Regulation No. 1005/2009 carried out as part of the Regulatory Fitness and Performance programme (REFIT) in 2019 concluded that “the Ozone Regulation is generally fit-for-purpose and is effective in achieving its objectives and that the main potential for improving the Regulation is related to enhancing its efficiency, coherence and clarity by fine-tuning specific measures.”

EPEE has supported the Ozone Regulation from its beginnings as an essential tool to protect the ozone layer. However, the context has considerably changed since it entered into force. While the ozone layer is in the process of healing, climate change, the reduction of greenhouse gas emissions and the importance of achieving carbon neutrality by 2050 have become a major challenge and a key priority of the European Green Deal. The EU F-Gas Regulation 517/2014 for which the review process is about to start, addresses the control of hydrofluorocarbons (HFCs) and is, as such, part of this broader context.

Both regulations – the Ozone Regulation and the F-Gas Regulation – were closely related in the past, since HFCs are one of the solutions to replace ozone depleting substances (ODS). But both subjects are now practically disconnected: the existing Ozone Regulation successfully reached its objectives, the European Union has already achieved its goals on the phase-out of ozone-depleting substances under the Montreal Protocol. It is also fit for purpose to prevent the possibility of a future come-back of ODS’s. Therefore, EPEE believes that the EU should now rather focus efforts on the EU F-Gas Regulation. In practical terms, this would mean to keep in place the existing Regulation No. 1005/2009 on ozone depleting substances while completing the review of the F-Gas Regulation No. 517/2014.

ABOUT EPEE:

The European Partnership for Energy and the Environment (EPEE) represents the refrigeration, air-conditioning and heat pump industry in Europe. Founded in the year 2000, EPEE's membership is composed of over 50 member companies, national and international associations from three continents (Europe, North America, Asia).

EPEE member companies realize a turnover of over 30 billion Euros, employ more than 200,000 people in Europe and also create indirect employment through a vast network of small and medium-sized enterprises such as contractors who install, service and maintain equipment.

EPEE member companies have manufacturing sites and research and development facilities across the EU, which innovate for the global market.

As an expert association, EPEE is supporting safe, environmentally and economically viable technologies with the objective of promoting a better understanding of the sector in the EU and contributing to the development of effective European policies.

As part of the activities EPEE and its members are undertaking to raise awareness on sustainable cooling, EPEE will launch a broader [#CountOnCooling campaign](#). The [EPEE White Paper](#) "Count on Cooling: A five-step approach to deliver sustainable cooling" examines the crucial role of cooling in the 21st century.

For more information please see our websites www.epeeglobal.org and www.countoncooling.eu

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