



EHPA position on the ban on pre-charged equipment

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EHPA, as the representative of the European heat pump industry, welcomes the efforts of the Council members to reduce greenhouse gas emissions to the atmosphere. However, it still has some concerns on the current Council text.

The European Heat Pump Association

1. **rejects the ban on pre-charged equipment** (Art. 12) and suggests to include all F-gases (in bulk and pre-charged) in the phase down instead;
2. calls for an efficient tracking system of all F-gases (quotas) placed on the EU market;
3. encourages the distribution of placing-on-the-market quotas via a market-based system to ensure cost-efficient availability of F-gases within the phase down trajectory;
4. re-iterates that heat pumps are a contributor to more energy efficiency, more RES and less CO₂ emissions and should be protected against any further burden in order to unleash their potential.

1. Banning pre-charged equipment is inappropriate and even counterproductive to the desired reduction of CO₂ equivalent emissions.

- Charging the unit in a controlled factory environment is necessary for quality products. At the same time, it is better to reduce leakages, and, by consequence, better for the environment.
- Banning pre-charging will result in an **increased amount of refrigerants needed**, as each unit (unless hermetically sealed) will have to be filled twice: **First in the factory** (a step indispensable for performance and safety tests), second on the **place of installation** (a step that will increase the likelihood of losses due to mistakes in the procedure).
- An unnecessary step of handling refrigerants is added to the manufacturing and installation process. Charging on-site is more demanding for the installer due to variable and changing conditions at the construction site. More certified installers will be needed. If quality cannot be ensured under all circumstances, the effect will be detrimental for the environment. More F-gas handling means higher cost!

Maintaining the phase-down procedure, as laid down in Article 13 and Annex V, does not require a pre-charged ban. Instead all HFCs placed on the EU market should be included in the phase down mechanism. This means all HFCs produced or imported in the EU, both in bulk and pre-charged equipment.

2. The flow of HFCs, including HFC inside pre-charged equipment can be tracked in an automated system.

This system would allow to fully control the integrity of the phase down without the needs for a pre-charge ban and without loopholes. **The heat pump industry supports the integration of pre-charged equipment in the phase down through** a reporting/tracking scheme **with an additional quota**. European heat pump manufacturers are willing and prepared to provide the exact amount of F-gases placed on the market in pre-charged equipment. However current proposals for a tracking system need to be more practical and easier to administrate in order to ensure an easy handling and efficient market surveillance and control.

3. The F-gas quotas should be placed on the market in an efficient, market-based solution

- HFCs should be made available to the market in a transparent way. The system introduced to the market should be based on a market mechanism to encourage players to make refrigerants available in the most cost efficient manner.
- A regular revision period should be kept in order to re-assess the quantity of refrigerant needed for heat pumps. The commission should be enabled to act on the findings of the re-assessment by being able to increase and decreased the quota the quota via delegated powers.

4. Heat pumps should not be a focus of the revision of the F-gas regulation

In general we would like to re-iterate that **heat pump technology should not receive additional burdens from the regulation**. Heat pumps are among the most energy efficient technologies in the heating sector and a technology of choice for the implementation of renewable energy in the building environment. However heat pumps are still subject to a disadvantage in investment cost when compared to fossil fuel based systems.

If the revision of the F-gas regulation leads to higher cost for heat pumps, it will increase the cost advantage of the competing fossil fuel based technologies. If this results in a preference for fossil fuel based technology, it will increase the related emissions! A recent Ecofys study commissioned by EHPA shows clearly that every ton of CO₂ equivalent from HFCs used in heat pumps results in 4 tons of CO₂ equivalent saved in overall emissions. In comparison, every fossil fuel based system installed instead of a heat pump leads to a **doubling of the amount of CO₂ equivalent emissions released to the environment**.

In consequence, the EU may achieve the target of reducing F-gas emissions via a reduction of their use in heat pumps, but will fail in its main task of reducing CO₂ equivalent emissions.

This mistake should be avoided at all cost.

We remain at your disposal for further information.

About EHPA: The European Heat Pump Association (EHPA, www.ehpa.org) promotes awareness and proper deployment of heat pump technology in the European market place for residential, commercial and industrial applications. EHPA has 102 members from 22 European countries representing the majority of actors in the European heat pump industry. The association aims to provide technical and economic input to European, national and local authorities in legislative, regulatory and energy efficiency matters. All activities are aimed at overcoming market barriers and dissemination of information in order to speed up market development of heat pumps for heating, cooling and hot water production. It is the declared aim of the association to make heat pumps a core technology in the development towards a more energy efficient, RES-based, sustainable energy system.