

APPLiA suggested amendments on F-Gases Regulation Proposal art. 11 & 35

APPLiA, the European association representing home appliances manufacturers, would like to share further recommendations for amendments on the F-Gases Regulation Proposal articles 11 and 35 that focus specifically on the review clause.

1. Article 35 - Review clause

Article 35 [new paragraph]	<i>No later than 1 January 2027, the Commission shall publish a report assessing whether cost-effective, technically feasible, energy-efficient and reliable alternatives exist, which make the replacement of fluorinated greenhouse gases possible in stationary split air conditioning and heat pump equipment <12kW and which makes a GWP150 limit possible in stationary split air conditioning and heat pump equipment >12 kW, referred to in point 18 of Annex IV, and where appropriate, put forward a legislative proposal to the European Parliament and to the Council to amend the list set out in Annex IV. In case that legislative proposal is not adopted five years ahead of the application dates of the prohibitions, the dates of the prohibitions listed in Annex IV shall by default be extended equivalent to the delay of the adopted legislative proposal.</i>
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This additional paragraph would improve the review clause specified in Article 35 of the Regulation proposal by adding specific reference to split air-conditioners and heat pumps.

2. Article 11 - Restrictions on the placing on the market

Commission's proposal - art. 11 paragraph 2	Proposed amendment - art. 11 paragraph 2
2. The prohibition set out in paragraph 1 shall not apply to equipment for which it has been established in ecodesign requirements adopted under Directive 2009/125/EC that due to higher energy efficiency during its operation, its lifecycle CO2	2. The prohibition set out in paragraph 1 shall not apply to: - equipment for which it has been established in ecodesign requirements adopted under Directive 2009/125/EC that due to higher energy efficiency during its operation, its lifecycle CO2 equivalent



equivalent emissions would be lower than those of equivalent equipment which meets relevant ecodesign requirements and does not contain hydrofluorocarbons	emissions would be lower than those of equivalent equipment which meets relevant ecodesign requirements and does not contain hydrofluorocarbons - <i>equipment which functioning relies on fluorinated greenhouse gases that have a GWP below 150 and are listed in Annex IV under the point 18 and where the refrigerant is not restricted under Annex XVII of Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).</i>
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As emphasised multiple times, we would like to stress again on the importance to keep the energy efficiency a first principle to be in line with the recently adopted [Energy Efficiency Directive](#) article 3.

Home appliances manufacturers, represented by APPLiA, remain committed to provide solutions that can mitigate climate change and reduce carbon emissions, including transitioning toward non-synthetic alternative refrigerants where possible in our products. That goes in line with our willingness to contribute to a Hydrofluorocarbons (HFCs) phase-down for 2050 and our support for the Energy Efficiency First Principle recently adopted in Directive (EU) 2023/1791, that should remain paramount when it comes to design innovative and highly-energy efficient products as ours.

Furthermore, the addition in the second paragraph would assure coherence with the REACH Regulation to make a clear distinction between substances considered as PFAS and others not as some HFOs. Indeed, we want to avoid the prevention of refrigerants' innovation that are not under the scope of the PFAS restriction proposal, thus, this clarification is imperative.

Reference contact

, Policy Manager, Environment
@applia-europe.eu