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General Secretariat

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REQUEST FOR CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on the Environment
Subject:	Gaz à effet de serre fluorés et substances appauvrissant la couche d'ozone : Suivi de la réunion du groupe environnement du 13 juin 2022 : Présentation de la Commission et appel à commentaires

Les délégations trouveront ci-joint la présentation de la Commission présentée à la réunion du 13 juin 2022 du groupe environnement sur le projet de règlement relatif aux gaz à effet de serre fluorés et le projet de règlement relatif à des substances qui appauvrissent la couche d'ozone.

Les délégations sont invitées à envoyer des commentaires écrits sur les chapitres 1 et 2 du règlement relatif aux gaz à effet de serre fluorés à la présidence ([redacted]) avec copie au Secrétariat Général du Conseil ([redacted]; environment@consilium.europa.eu) jusqu'au **jeudi 30 juin COB**.

La présidence rappelle aux délégations que la prochaine réunion du groupe environnement sur ces deux projets de règlement est prévue le 20 juin et portera sur les **chapitres 3, 4 et 5** du règlement relatif aux gaz à effet de serre fluorés.

European Commission

Consistency with RePower EU

Review of Regulation (EU) 517/2014 on fluorinated greenhouse gases

Modelling the phase-down

- AnaFgas used industry numbers on equipment communicated during the stakeholder consultation process
- The proposed phase-down schedule was constructed on the basis of replaceablility of F-gases, but containes a **number of important buffers**, i.a.
  - A very substantial **backlog („bank“) of authorisations** that can be used in the coming years to cover equipment imports (*ca 7 years of equipment imports);*
  - A **generously modelled initial demand** of HFCs **for the MDI sector** assuming a very high growth scenario between 2020 and 2024, very likely exceeding actual growth (*up to 3.5 MtCO2e*);
  - **Full quota need counted for the imports** of HFCs that are eventually exported inside equipment, despite the fact that in some sectors, e.g. the car AC sector, it is common practice to avoid the custom procedure of „release for free circulation“ and thus the need for quota. The same work-around can be used by MDI producers in the future (*up to 5MtCO2e*)

Impact of Repower EU

RePowerEU requires a greater reliance on heatpumps

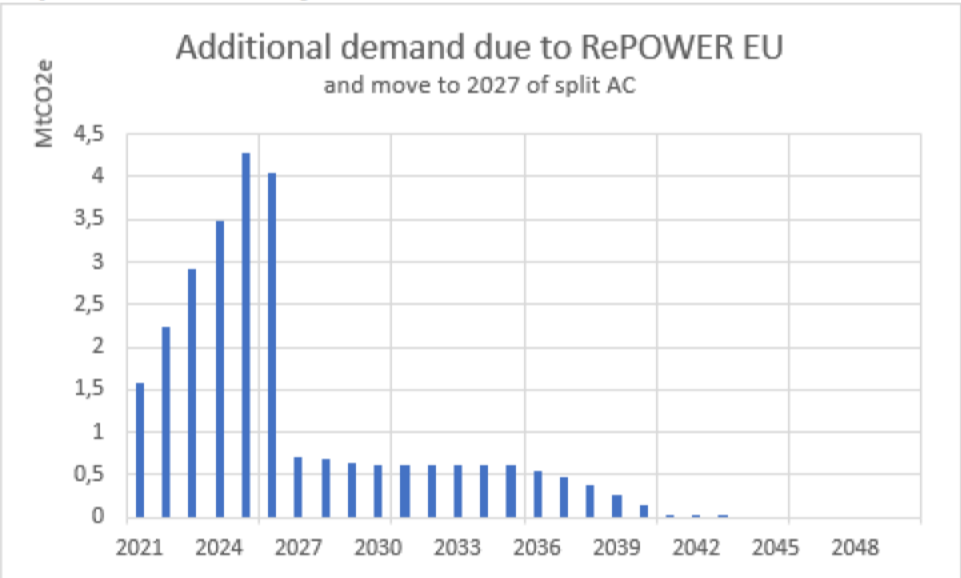
- The **crucial sector are small heatpumps** used in the residential sector, here we can avoid HFCs in the near („self-contained“ in 2025) and medium-term („small splits“ in 2027)

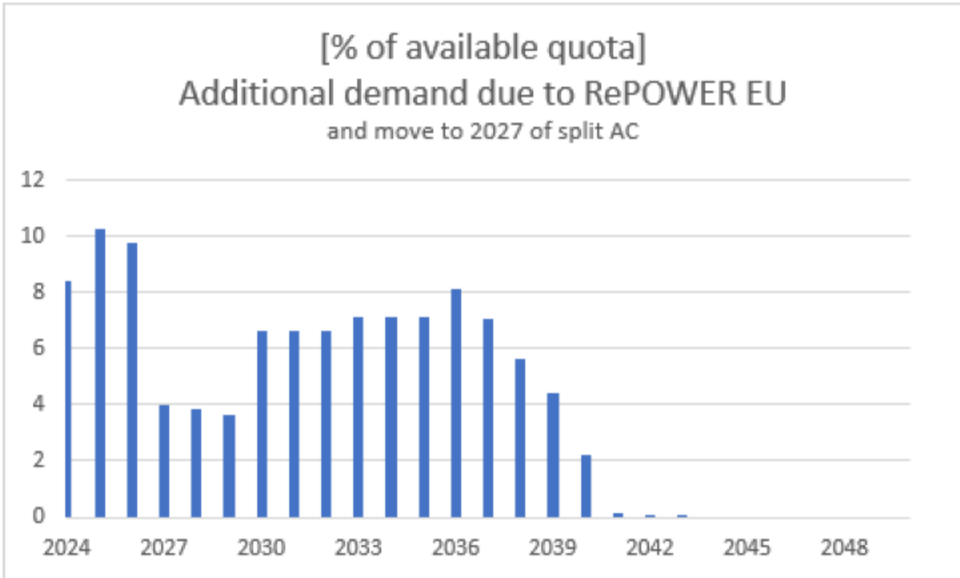
→ Annex IV ascertains that we do not phase in large HFC banks that will create emissions for decades due to servicing and end-of-life

- In the IA we made an estimation of the extra need expected due to RePower EU which was relatively small
- In the meantime we have done a re-modelling of the HFC demand (next slide)

Re-modelling: Impacts of Repower EU

Using recent very high growth numbers from the industry (EHPA): The additional HFC needed to accomodate assumed heatpump growth for Repower EU is < 10% of the available quota each year





This additional growth can be fully absorbed by the existing buffers of the phase-down

→ **The proposal is fully in line with heatpump growth assumed under Repower EU**

European Commission

In the unlikely case of trouble…

- Art 11(4) and 16(4) allows to exempt equipment from prohibitions/phase-down by IA on the basis of a substantiated request by a MS
- Art 17(6) foresses a DA to provide flexiblity for the quota system in case of major disruptions or undesirable/unintended effects

To have this flexibility is crucial, not least in light of RePower EU, the inclusion of MDIs and that in the future also sectors have to move where progress so far has been slow

Precedent: Gas unavailability for a few months in 2017/18 where no near-time intervention was possible on the basis of the F-gas Regulation

Other points on heatpumps

- Replacement of the HFC in small heatpumps will lead to important lower operating costs (**energy savings**) for the endusers

Room AC - Single split (includes small multi-split <12 kW & reversible air-to-air heat pumps)				
considered gases / technologies:		R-410A direct	R-290	HFC-32
GWP AR4 of refrigerant	[1]	2087,5	3	675
total annualised operating cost, 2024-2036 average HFC prices considered for policy option 2 (proportionate action)	€/a	**466**	**423**	**437**
total annualised operating cost, 2050 HFC prices considered for policy option 2 (proportionate action)	€/a	**527**	**423**	**453**

- **Safety concerns**: A new standard IEC 60335-2-40 has been adopted last month. This allows the safe use of propane in most smaller heatpumps, and also allows designing for higher energy efficiency!

European Commission