

EPEE COMMENTS TO DANISH PROPOSAL FOR A NEW F-GAS LAW

The European heating, cooling, refrigeration and heat pump industry represented by EPEE (the European Partnership for Energy and the Environment) has been informed of a law proposal in Denmark that would introduce additional restrictions on HFCs compared to the EU F-gas Regulation.

- ✓ While building on the existing Danish law, we understand that the proposed new rules would explicitly allow the use of refrigerants with a GWP below 25. EPEE welcomes this clarification as it takes into account the recent introduction of HFOs– a development which was less obvious when the existing Danish law was established.
- ✗ However, EPEE is extremely concerned about the proposed end-dates to the exemptions in 2030, meaning total ban of all F-gases with a GWP above 25 from 2030 onwards.

Even if it still seems far away, the proposed ban would, de facto, already today strongly discourage investments into any f-gas based technologies as customers would not be able to rely on long term serviceability and usability of the equipment. While this may be the intention of the proposed ban, it is a very risky approach which is likely to backfire rather than benefitting the environment and may pose risks in terms of safety, training and energy-efficiency. For example, energy efficient technologies such as heat pumps would directly suffer already today as fluorine-free alternatives are not always readily applicable due to flammability restrictions and related standards. Yet, heat pumps are widely used in Denmark and essential to ensure progress towards a less energy dependent Europe.

EPEE emphasizes that the new EU F-Gas Rules already provide a strong framework for the EU to significantly reduce HFC consumption by 79% in 2030. In addition, on a global level, discussions are making progress towards a global phase-down of HFCs. This situation is not comparable to the time (2002) when the existing Danish law was introduced, when no EU F-gas Regulation existed, let alone an EU phase-down or a potential global phase-down on HFCs.

Today the context is completely different. With new and ambitious EU rules in place, industry, installers and consumers need a well-functioning, clear and harmonised internal market to make change happen. Adding any further local steps such as the proposed total ban of F-gases from 2030 are counter-productive and will create confusion in the market and slow down the transition to lower GWP alternatives rather than accelerating it.

EPEE therefore strongly recommends that Denmark aligns with the EU F-Gas Regulation, by:

- ✓ **Removing the end-dates for the exemptions in 2030;**
- ✓ **Aligning these exemption provisions with the EU F gas Regulation (which in some cases would entail a more strict end date and in other cases would not include an end date) and giving a detailed explanation on the exemptions and their alignment with EU rules in the guidance document that will accompany the new Danish rules;**
- ✓ **Adding a clause - like in the EU F-gas rules - that would allow to apply for additional exemptions on grounds of energy efficiency, safety, and availability and cost effectiveness.**