

Evaluation and Impact Assessment of the F-gas Regulation

Fields marked with * are mandatory.

Introduction

Fluorinated gases (F-gases) are strong, man-made greenhouse gases that contribute to global warming. The most relevant F-gases are hydrofluorocarbons (HFCs), as well as perfluorocarbons (PFCs) and sulphur hexafluoride (SF6). Since 1990, EU emissions of F-gases almost doubled until 2014, after which they started to decline due to EU legislation. They are used in various applications (e.g. refrigeration, air-conditioning, insulation foams), but also in some industrial processes and electrical transmission (SF6). The current F-gas Regulation ([Regulation \(EU\) No 517/2014](#)) applies since 2015 and aims at reducing EU F-gas emissions by two-thirds by 2030, compared to 2010 levels.

The F-gas Regulation preceded the passing of both the Paris Climate Agreement and the Kigali Amendment to the Montreal Protocol on substances that deplete the ozone layer, where Parties agreed to limit progressively the production and consumption of HFCs. More recently, the EU Commission adopted the European Green Deal Communication and proposed a European Climate Law establishing the framework for achieving the objective of climate neutrality by 2050, including increasing the ambition of 2030 climate targets. Ambitious action to avoid emissions of high global warming potential (GWP) greenhouse gases such as F-gases is key to reaching these objectives.

The inception impact assessment on the F-gas Regulation can be found [here](#).

The purpose of this open public consultation (OPC) is to determine public opinion on the performance of the existing F-gas Regulation to date and on the choice and potential impacts of future policy options. As the evaluation of the current Regulation will be conducted back-to-back with the impact assessment of the Commission proposal for revising the rules, this consultation will cover both.

This questionnaire is split into three parts: general awareness of F-gas (policy) (Part 1), general views on the F-gas Regulation (Part 2) and specialised views on the choice and impacts of the envisaged policy options (Part 3).

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish

- Dutch
- English
- Estonian
- Finnish
- French
- Gaelic
- German
- Greek
- Hungarian
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Jeremy

* Surname

Nicholson

* Email (this won't be published)

nicholson@ifieceurope.org

* Organisation name

255 character(s) maximum

IFIEC Europe
The International Federation of Industrial Energy Consumers in Europe

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

1978775156-31

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|--------------------------------------|--|-------------------------------------|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |

- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland

- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria

- Burkina Faso
- Burundi

- Cambodia

- Cameroon

- Canada
- Cape Verde
- Cayman Islands

- Central African Republic
- Chad
- Chile
- China

- Christmas Island
- Clipperton

- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica

- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue

- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru

- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo

- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States

- | | | | |
|--|----------------------------------|---|--|
| <input type="radio"/> Cocos (Keeling) Islands | <input type="radio"/> Japan | <input type="radio"/> Philippines | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia | <input type="radio"/> Jersey | <input type="radio"/> Pitcairn Islands | <input type="radio"/> Uruguay |
| <input type="radio"/> Comoros | <input type="radio"/> Jordan | <input type="radio"/> Poland | <input type="radio"/> US Virgin Islands |
| <input type="radio"/> Congo | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal | <input type="radio"/> Uzbekistan |
| <input type="radio"/> Cook Islands | <input type="radio"/> Kenya | <input type="radio"/> Puerto Rico | <input type="radio"/> Vanuatu |
| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Qatar | <input type="radio"/> Vatican City |
| <input type="radio"/> Côte d'Ivoire | <input type="radio"/> Kosovo | <input type="radio"/> Réunion | <input type="radio"/> Venezuela |
| <input type="radio"/> Croatia | <input type="radio"/> Kuwait | <input type="radio"/> Romania | <input type="radio"/> Vietnam |
| <input type="radio"/> Cuba | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Russia | <input type="radio"/> Wallis and Futuna |
| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Rwanda | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Yemen |
| <input type="radio"/> Czechia | <input type="radio"/> Lebanon | <input type="radio"/> Saint Helena Ascension and Tristan da Cunha | <input type="radio"/> Zambia |
| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Kitts and Nevis | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

I agree with the [personal data protection provisions](#)

Are you involved in any of the following activities with respect to F-gases?

	yes	no
Manufacture/trade/sale of gases	<input type="radio"/>	<input checked="" type="radio"/>
Manufacture/trade/sale of equipment	<input type="radio"/>	<input checked="" type="radio"/>
Use of equipment	<input checked="" type="radio"/>	<input type="radio"/>
Installing, maintenance, leakage checks	<input checked="" type="radio"/>	<input type="radio"/>
Recovery, recycling, reclamation or destruction	<input type="radio"/>	<input checked="" type="radio"/>
Training and certification	<input checked="" type="radio"/>	<input type="radio"/>
Manufacture/trade/sale of equipment with F-gas alternatives	<input type="radio"/>	<input checked="" type="radio"/>
Use of equipment with F-gas alternatives	<input checked="" type="radio"/>	<input type="radio"/>
Other	<input checked="" type="radio"/>	<input type="radio"/>

Please specify:

100 character(s) maximum

Our members are downstream users of equipment filled with SF6.

Which F-gas sector are you active in?

- Stationary refrigeration/AC
- Mobile AC
- Transport refrigeration
- Fire protection
- Electronics manufacture
- Switchgear and related equipment
- Aerosols
- Foams
- Other

Part 1 - Awareness of F-gases

Part 1 seeks to explore your general awareness of F-gas policy

1. Are you informed about:

	Very well informed	Reasonably well informed	Poorly informed	Not informed
Different types of F-gases, their sources, uses and emissions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact of F-gases on climate change	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU F-gas policies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
International F-gas policies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
General international and EU climate policies (Paris Agreement, European Green Deal)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

2. Are you familiar with:

	Very familiar	Somewhat familiar	Not very familiar	Not familiar
Containment of F-gases	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Training and certification for F-gas personnel	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Restrictions related to use of F-gases and equipment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Quota system for F-gases	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Company reporting and verification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Part 2 - General views on the F-gas Regulation

Part 2 seeks to gather general views as regards the performance of the F-gas Regulation and the need for any changes

3. What impact has the F-gas Regulation had with respect to its objectives?

	Very positive	Positive	Neutral	Negative	Very negative	Cannot say
Contribute towards meeting the EU's climate targets	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitate the agreement to phase down HFCs under the Montreal Protocol	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Discourage the use of F-gases with high GWP in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Promote the use of alternative substances or technologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Prevent leakage and ensure proper end-of-life treatment of equipment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stimulate innovation and develop green technologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

4. To what extent does the F-gas Regulation contribute to recent related EU or international objectives?

	Contributes strongly	Some contribution	Neutral	Adverse contribution	Cannot say
European Green Deal	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Montreal Protocol (Kigali Amendment)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Paris Climate Agreement	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

5. To what extent has the F-gas Regulation been coherent with other EU and international legislation?

	Fully coherent	Somewhat coherent	Not coherent	Cannot say
Montreal Protocol (Kigali Amendment)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Paris Climate Agreement	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mobile Air Conditioning (MAC) Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Ozone Regulation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ecodesign Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
WEEE Directive and other waste legislation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Customs legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please elaborate:

1000 character(s) maximum

The EU F-Gas Regulation limits the emissions of F-Gases, thus contributes to the International Agreement to reduce Global Warming. EU F-Gas also promotes collection & recycling of F-Gases. Recycling is complex as the collected F-gases are considered under the Waste Legislation as waste. Therefore the collection and recycling is not fostered by Waste Legislation. An exemption would help develop the recycling of F-Gases.

6. Does the F-gas Regulation cover all relevant sectors and sub-sectors using F-gases?

- Yes
- No
- Don't know

7. To what extent have the Regulation's requirements been effective regarding its objectives (see question 3 above)?

	Very effective	Effective	Not very effective	Ineffective	Cannot say
Containment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recovery and producer responsibilities schemes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Training and certification	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labelling	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Restrictions on use and equipment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
HFC quota system	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reporting and verification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Collection of emissions data	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please elaborate:

1000 character(s) maximum

The EU F-Gas Regulation implementation is very diverse Europe wise. The mapping of the installed equipment highly varies from a country to another. Consequently the control of deficient equipment or behaviour may be improved. As well the collection of data might be enhanced by a better coverage of existing equipment.

8. Have the following factors presented important challenges for implementing the F-gas Regulation?

Please rate from 1 (= no challenge) to 5 (=very serious challenge)

	1	2	3	4	5	Cannot say
Lack of technical solutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of information and awareness	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
General economic situation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
F-gas policies in non-EU countries	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Unjustified barriers in safety standards and codes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Lack of training on F-gas alternatives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Illegal imports	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Misuse of quota system	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
High number of new market players	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
COVID-19 pandemic	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other challenges:

1000 character(s) maximum

The purpose of the F-Gas Regulation is to limit emissions of F-Gases. The most efficient way to reach this target is before changing the actual Regulation, to implement it strongly and uniformly Europe wise. All other measures would have a limited impact reaching the overall purpose.

9. Have the following measures been effective in preventing illegal activities?

	Very effective	Effective	Not very effective	Ineffective	Cannot say
Inspections	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Penalties	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Customs control	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Market surveillance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reporting and verification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please elaborate:

1000 character(s) maximum

Our sector used SF6, as F-Gas. To our best knowledge, SF6 is not heavily impacted by the illegal import of F-Gases.

10. Has the F-gas Regulation been flexible enough to respond to:

	Yes	No	Cannot say
Delays in technological developments and/or market disruptions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
New or emerging issues	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

11. In what way has the F-gas Regulation impacted:

	Very positively	Positively	Neutral	Negatively	Very negatively	Cannot say
EU competitiveness	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Trade with third countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better stewardship of F-gases by equipment operators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
F-gas policies by other countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU credibility in this area	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

12. Has the COVID-19 crisis negatively impacted any F-gas sectors?

- yes
- no

13. Have the costs of the following measures been justified to achieve the objectives (see question 3)?

Please rate from 1 (benefits significantly outweigh the costs) to 5 (Costs significantly outweigh the benefits)

	1	2	3	4	5	Cannot say
Containment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Training and certification	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recovery and producer responsibilities schemes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labelling	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Restrictions on use and equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
HFC quota system	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reporting and verification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Collecting emissions data	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
National enforcement actions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

14. How costly have the following measures been for business?

Rate from 1 (marginal costs) to 5 (very high costs)

	1	2	3	4	5	Cannot say
Containment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Training and certification	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recovery and producer responsibility schemes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labelling	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Restrictions on use and equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
HFC quota system	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reporting and verification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

16. Is the F-gas Regulation

Rate from 1 (fully agree) to 5 (absolutely not)

	1	2	3	4	5	Cannot say
..clear?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
..consistent?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please elaborate:

1000 character(s) maximum

As users of some equipment filled with SF6 or energy consumers, the price of the electricity is influenced by the Regulation on SF6.

17. The F-gas Regulation has

Rate from 1 (fully agree) to 5 (absolutely not)

	1	2	3	4	5	Cannot say
..levelled the playing field across the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
..increased the level of policy ambition across the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
..improved consistency of relevant safety standards and codes across the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

18. Do you consider that the F-gas Regulation may lead to an increased accumulation of persistent chemicals in the environment?

- Yes
- No
- Cannot say

19. Any other comments

5000 character(s) maximum

Please include any further information useful for this evaluation and impact assessment. In particular, please provide public references to relevant studies, position papers, and case studies or upload relevant documents.

The actual EU F-Gas Regulation focuses on controlling & limiting emissions of Fluorinated Greenhouse Gases. We strongly support this target. This is why we strongly believe that implementing uniformly in Europe measures to control leakages and emissions are the most efficient measures to reach this target. We would highlight that any ban of substance is not efficient. A strict control of substance emissions during lifecycle of this substance prevents to impact the environment. We would like to stress that socio-economical impact of potential measures should be seriously assessed before implemented.

Please upload your file

The maximum file size is 1 MB

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Part 3 - Specialised views on policy options

Part 3 seeks to gather specialised views on the existing regulatory provisions and considered changes to the existing rules. It requires detailed technical knowledge of the F-gas Regulation.

Information for stakeholders:

The following policy options are under consideration:

1. Seeking alignment with the Montreal Protocol
 - Add new phase-down steps beyond 2030
 - Remove some exemptions and thresholds not foreseen by the Montreal Protocol
 - Make separate HFC production phase-down
 - Add flexibility to align with future Montreal Protocol decisions
2. Raising ambition in line with European Green Deal
 - Increase HFC phase-down ambition
 - Prohibit the use of F-gases where feasible
3. Improve implementation and enforcement
 - Training on non-F-gas alternatives
 - Detailed rules for customs and surveillance authorities, and facilitating the use of the EU Single Window environment for customs
 - Strengthen obligations of economic operators to prevent illegal trade
 - Limit the market players to legitimate participants
 - More comprehensive monitoring

20. Do you agree that the following review objectives are relevant:

Rate from 1 (fully agree) to 5 (strongly disagree)

	1	2	3	4	5	Cannot say
Ensure EU long-term compliance with Montreal Protocol	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Raise ambition in light of the Green Deal and technological progress	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improve implementation and enforcement	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

21. Do you see any other main objective for the revision, keeping in mind that a large number of changes may delay the negotiations and thus prevent quickly fixing urgent implementation issues? Please elaborate:

1000 character(s) maximum

As industrial energy consumers, this is crucial that the socio-economic impact of future measure is seriously assessed. The competitiveness of the European Economy would be seriously impacted by an increase of the price of the electricity.

To improve the collection and recycling of F-Gases through a straight forward measure is to not treat

collected F-Gases as waste. This would facilitate the process of collection and recycling. To insure safety of users of recycled F-Gases, reclaimed gases should demonstrate identical properties as virgin ones.

22. Do you think the original objectives of the F-gas Regulation (see question 3) and the proposed policy options (see information above) could be better achieved at EU Member State level?

- Yes
- No
- Cannot say

Information for stakeholders: The [EU Single Window Environment for Customs](#) involves establishing automatic links between the F-gas Portal and the IT systems of the Member States' customs authorities via a central system supported by the Commission. This will facilitate the customs clearance process by enabling automatic checks of data in customs declarations with data in the F-gas Portal. Further, it would allow for quantity management of F-gases imported in the Union and help to prevent illegal imports.

23. How important are the following measures for improving implementation and enforcement?

Rate from 1 (very important) to 5 (not important)

	1	2	3	4	5	Cannot say
Training of technicians on F-gas alternatives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Strengthen the role of customs and facilitate the link with the EU Single Window Environment for customs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen obligations of economic operators to prevent illegal trade	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Limit the market players to legitimate participants	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More comprehensive monitoring	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimum requirements for penalties at Member State level	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other relevant measure for improving enforcement, please specify:

1000 character(s) maximum

European mapping of the installation would help tracing emission sources.

24. To what extent will the following policy options reduce emissions?

Rate from 1 (large savings) to 5 (no benefit)

	1	2	3	4	5	Cannot say

Increase HFC phase-down ambition in line with technological development	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Prohibit the use of HFCs in applications where they are no longer needed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Prohibit the use of other F-gases (i.e. SF6, PFCs,..) in applications where these gases are no longer needed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

25. To what extent will the following policy options impact administrative costs?

	Reduce significantly	Reduce	No impact	Increase	Increase significantly	Cannot say
Add new HFC phase-down steps beyond 2030	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Remove some exemptions and thresholds not foreseen by the Montreal Protocol	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Make separate HFC production phase-down	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Add flexibility to align with future Montreal Protocol decisions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase HFC phase-down ambition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Prohibit the use of F-gases in products or equipment, where these gases are no longer needed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Technicians training on non-F-gas alternatives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Detailed rules for customs and surveillance authorities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen obligations of economic operators to prevent illegal trade	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Limit the market players to legitimate participants	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More comprehensive monitoring	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

26. Where you expect administrative costs to be significant, please quantify them (EUR or person hours) per relevant option:

1000 character(s) maximum

27. To what extent will the following policy options impact operational costs?

	Reduce significantly	Reduce	No impact	Increase	Increase significantly	Cannot say
Add new HFC phase-down steps beyond 2030	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Remove some exemptions and thresholds not foreseen by the Montreal Protocol	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Make separate HFC production phase-down	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Add flexibility to align with future Montreal Protocol decisions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase HFC phase-down ambition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Prohibit the use of F-gases in products or equipment, where these gases are no longer needed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Technicians training on non-F-gas alternatives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Detailed rules for customs and surveillance authorities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen obligations of economic operators to prevent illegal trade	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Limit the market players to legitimate participants	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More comprehensive monitoring	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

28. Where you expect operational costs to be significant, please quantify them (EUR or person hours) per relevant option:

1000 character(s) maximum

29. Do you expect any of the policy options to impact on:

	Significant effect	Slight effect	No effect	Cannot say
EU competitiveness	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Trade with non-EU countries	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Employment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consumer prices	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
R&D and innovation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Internal market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Specific regions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-EU stakeholders and international relations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
SMEs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public health and safety	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Where significant, please describe effect for the relevant option:

1000 character(s) maximum

The potential limitation of the use of SF6 will need some unbudgeted investments at TSO and DSO. As consequence energy distributors will cascade those costs to the downstream users. Thus the inevitable increase of the price of electricity would impact all the downstream users in Europe. In addition power industry has equipment at site currently using SF6 and a limitation will require costly investments. Consequently the competitiveness of Europe base industry would suffer.

Contact

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