


F-Gas French positions

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 **ATMO** solutions for europe
sphere natural refrigerants

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A few data on the French market



The French market of refrigerants

In 2011,

- 10 881 t of HFCs/HCFCs were placed on the French market which represent 25.827 Mt eq. CO₂.
- The French bank of refrigerants is estimated to 56 507 t including 5 612 t of natural refrigerants.
- The French HFC refrigerants emissions represent 13.2 Mt eq. CO₂.
- 32% of the French emissions come from the 12% of HFC that are installed in commercial refrigeration equipments.

The French positions on the revision of the Fgas regulation



The French certification scheme

Personnel certificate : no limit of validity
Company certificate : 5 years

+ **A compulsory audit of the company during the period of validity of its certificate.**

+ **A compulsory reporting scheme.**

➔ More than 72 000 personnel are certified.

➔ More than 30 000 companies are certified.

Compliant should not be penalized

Implementing the certification schemes takes time.

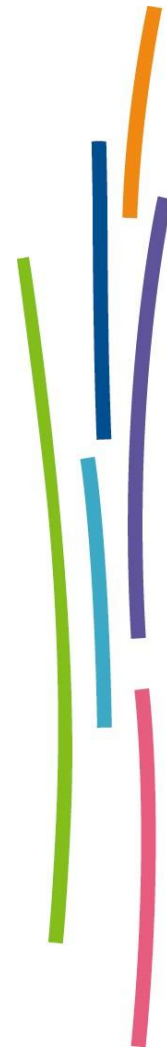
Any modifications of the current certification requirements will :

- Penalize Members states that have implemented the Fgas regulation in the right time;**
- Penalize undertakings certified under these schemes;**
- Advantage Members states without operational certification schemes;**
- Advantage uncertified undertakings.**



A global agreement on HFCs

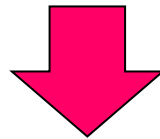
France supports the use of the Montreal Protocol institutions to manage the HFCs global reduction and supports the reduction of the placing on the EU market of HFCs proposed by the Commission.



A global agreement on HFCs

The quotas allocation mechanism of the future Fgas regulation, on which relies the HFC phase down, should be considered as an opportunity to fund the global reduction of the production and consumption of HFCs under the Montreal Protocol.

- ➔ It would be a clear signal on the commitment of the EU for such a global agreement on HFCs.
- ➔ It would rely on principle that polluter pays.



The quotas shall not be allocated for free.

The EU HFC market

According to the Commission proposal, more than 85% of the quotas to be allocated (160 Mt eq. CO₂ on 186 Mt eq. CO₂) will be allocated to the 5 major EU producers/importers of bulk HFCs.

This domination will be strengthened by the Commission quotas allocation method (*grandfathering*) which freezes the market shares and limits the access to the quotas to producers/importers of bulk HFCs.



The Commission quotas allocation method

The strengthening of the domination of the 5 companies by the Commission quotas allocation method (*grandfathering*) may:

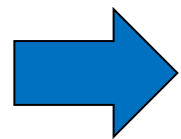
- **Facilitate the organization of the shortage of HFCs that are no longer under patent;**
- **Favor the development of transitional HFCs whereas lower GWP technologies might already be available;**
- **Restrain the innovation by limiting the availability of certain HFC.**

It does not provide revenues to Members states but to the 5 dominating companies → No funding for a global agreement on HFCs.

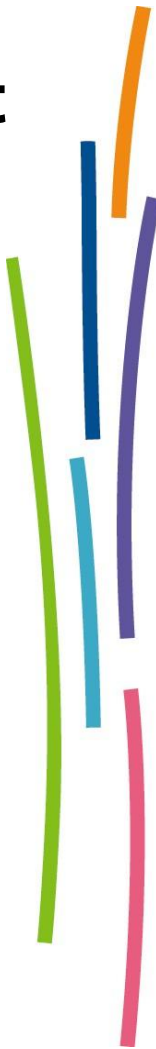
Avoiding the market distortion

Opening the quotas allocation mechanism to producers/importers of equipment should limit the market distortion by giving flexibility on HFC procurement.

The same rules shall be applied to allocate quotas for bulk HFCs and HFC precharged equipment to remove any market distortion.

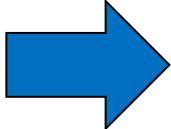
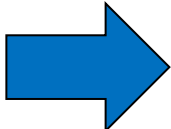
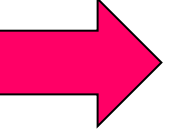


At least two allocation mechanisms could allocate quotas in a non discriminatory manner while being compatible with paid quotas.



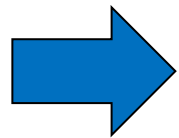
AUCTIONS

Such an allocation mechanism is fair and non discriminatory; any producer/importer may participate to the auctions : no need of reference value or new entrant reserve.

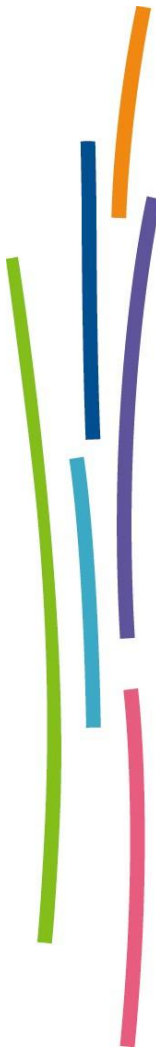
-  **There is no distinction between bulk HFCs and HFC precharged equipment: You need to buy quotas to place HFC on the market.**
-  **The precharged ban is useless since all HFCs are under the quota system.**
-  **It provides revenues to fund the global reduction of HFCs.**

The service ban should be enforceable

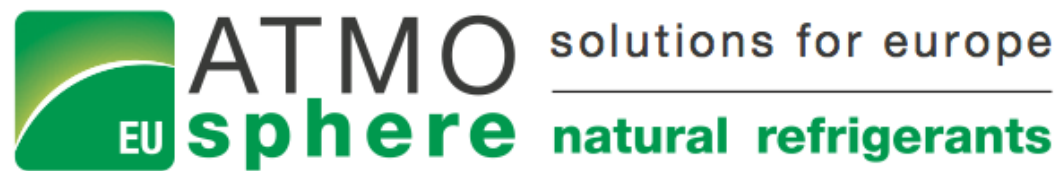
As long as there is a legal market for high GWP refrigerants, compliance with any service ban is vain.



The Fgas service ban should be aligned on the complete set of provisions of the ODS regulation → the placing on the market of high GWP refrigerants should be banned.

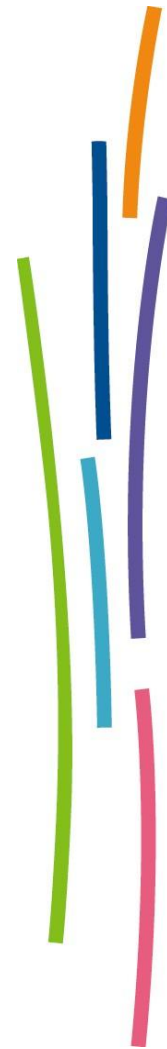


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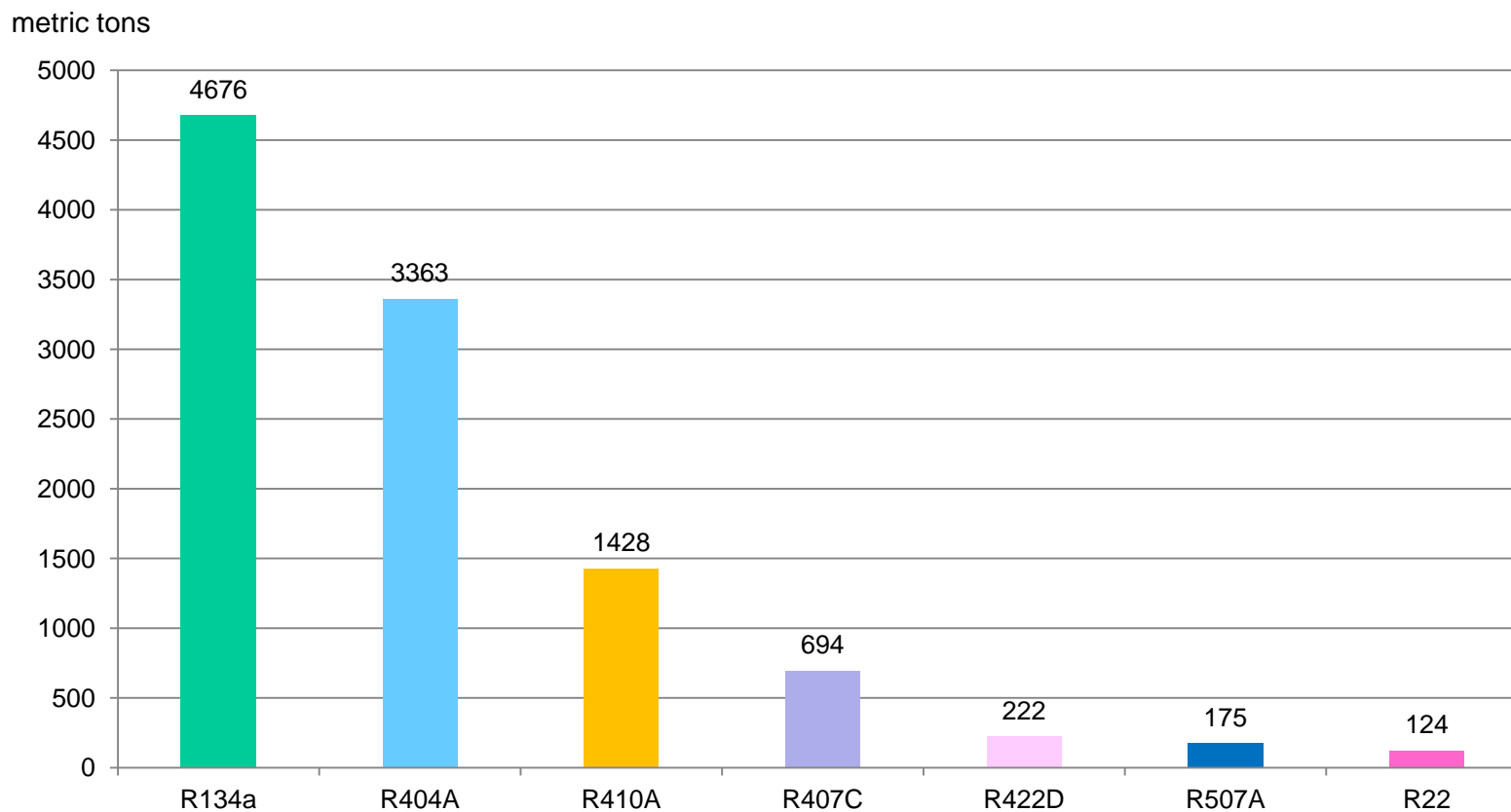


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Additional information

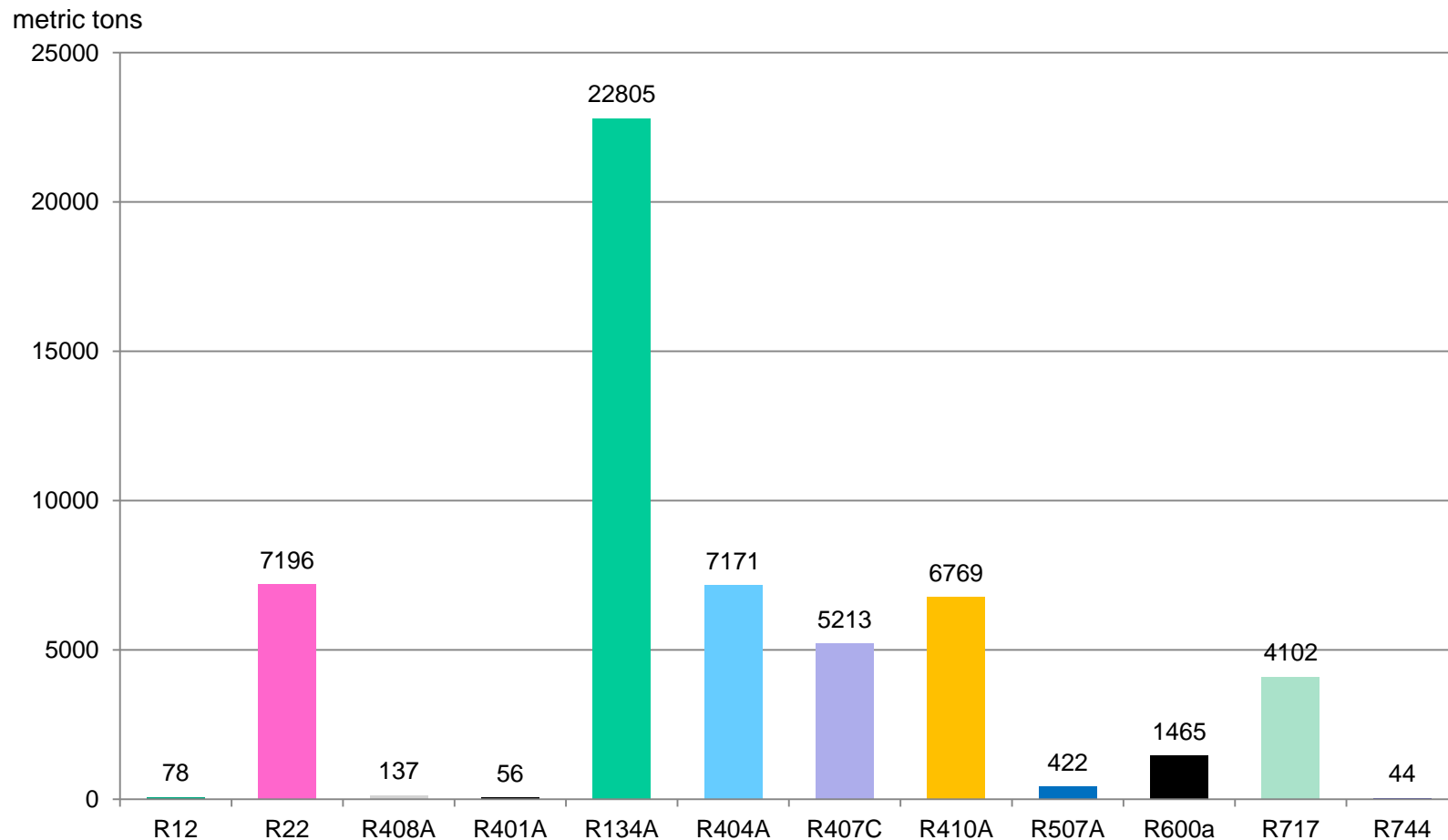


The French market of refrigerants



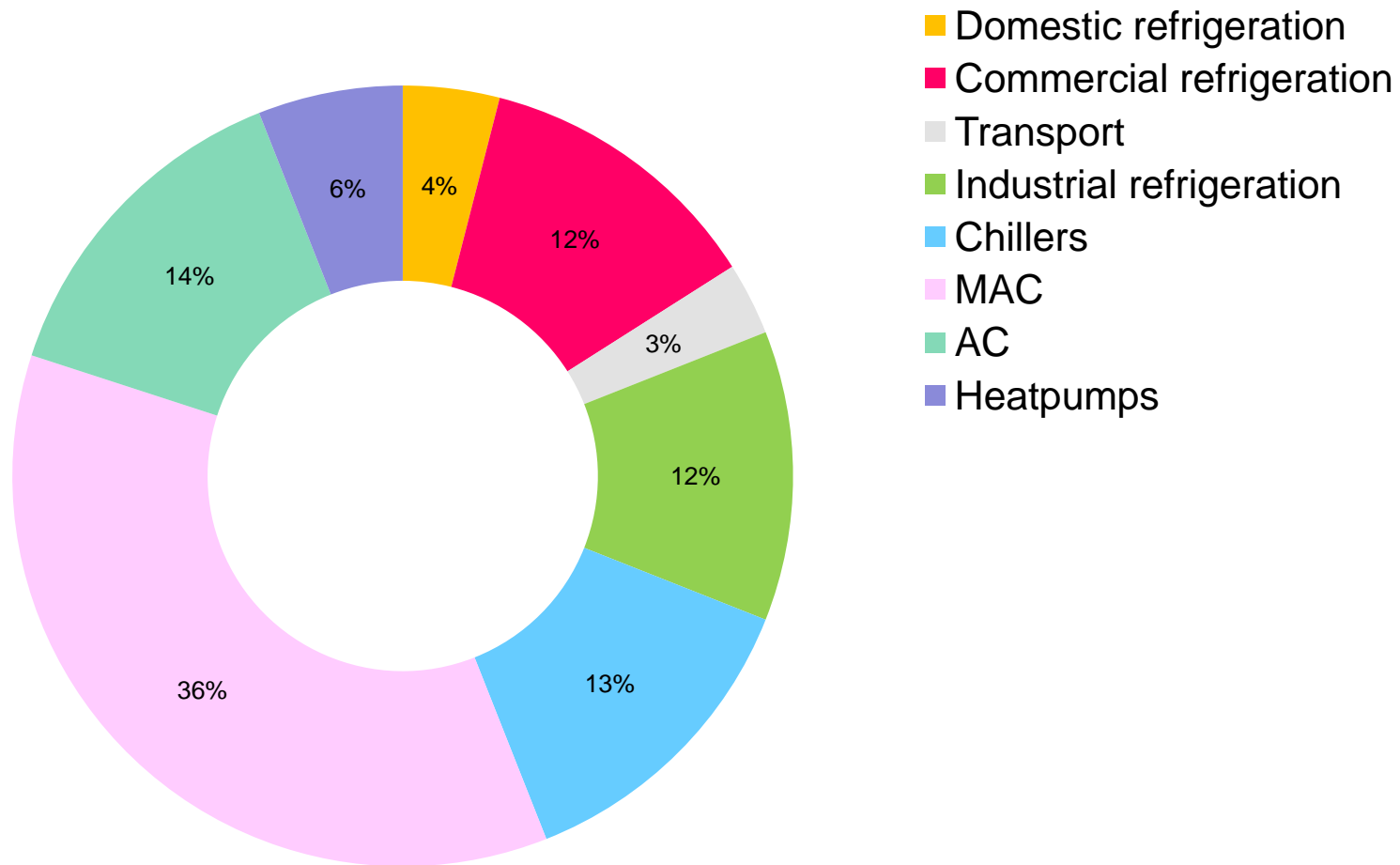
10 881 tons of HFCs/HCFCs were placed on the French market which represent 25 827 Mt eq. CO₂.

The French bank of refrigerants



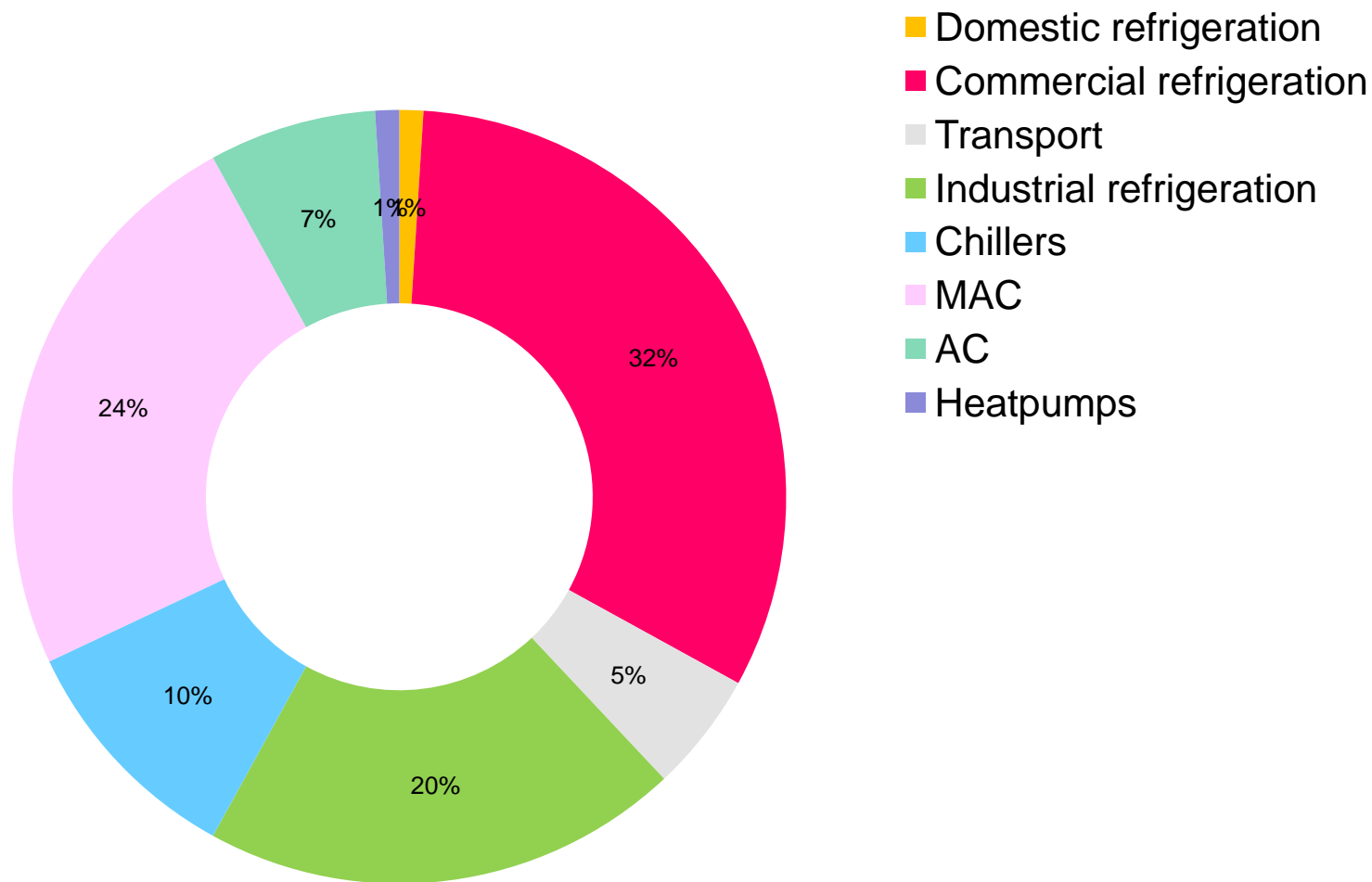
In 2011, the French bank of refrigerants is estimated to 56 507 t among which 5 612 t are *natural* refrigerants.

The French bank of HFC refrigerants



In 2011, the bank is dominated by MAC.

The French emissions of HFC refrigerants

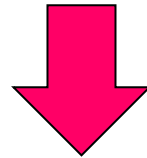


In 2011, the French HFC refrigerants emissions represent 13.2 Mt eq. CO₂. They are dominated by commercial refrigeration.

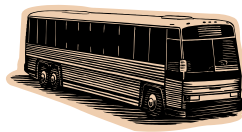
The French scope

The first French national regulation related to halo carbonated refrigerants was established in 1992.

The French scope is broader since Fgas provisions (including certification provisions) apply to any equipment that rely on HFC refrigerants.



stationary and mobile equipments



- Refrigerated trucks
- Refrigerated vans
- Refrigerated Ships
- Buses (AC)
- Trains (AC)
- ...

