



Deutsche Umwelthilfe

CDM



Watch

Scrutinizing Carbon Offsets

Brussels, 31 October 2012

via electronic mail

To: President Barroso

Cc: Commissioner Hedegaard  
Commissioner Tajani  
Commissioner Almunia  
Commissioner Oettinger

Dear President Barroso,

We are writing to express our grave concern that the Commission may eliminate or weaken the proposed bans on the use of HFCs in refrigeration from its proposal to revise the F-Gas Regulation. It is our view that any weakening or omission would seriously undermine EU ambition and the overall regulatory framework. It would also go against the legislative mandate from Parliament and the Council to the Commission to propose additional bans where technically feasible, cost-effective and energy-efficient alternatives are available.<sup>1</sup>

The arguments for bans in refrigeration are well-known, and are supported by an unparalleled body of technical evidence<sup>2,3,4</sup> and an abundance of real-world experiences.<sup>5</sup> They are essential components of a package of policies to reduce HFC emissions in this sector, which comprises the highest proportion of HFC emissions, and serve as key elements to any phase-down schedule. A phase-down schedule without bans will needlessly lock in HFC infrastructure and prolong reliance on costly containment and recovery measures for decades. Given the energy efficiency gains from transitioning away from HFC-based equipment in refrigeration, bans will also achieve much-needed indirect GHG reductions by reducing the demand for electricity. Our strong view is that the inclusion of bans in refrigeration is the only way forward. While a phase-down is a valuable part of an overall

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<sup>1</sup> Regulation (EC) No 842/2006 of the European Parliament and of the Council on Certain Fluorinated Gases, 17 May 2006, Off. J. Eur. Union L 161/1-10, Article 10(2)(j).

<sup>2</sup> Öko-Recherche et al., *Preparatory Study for a Review of Regulation (EC) No 842/2006 on Certain Fluorinated Greenhouse Gases, Final Report* (September 2011).

<sup>3</sup> Umweltbundesamt, *Avoiding Fluorinated Greenhouse Gases: Prospects for Phasing Out* (June 2011, English Version).

<sup>4</sup> Bio Intelligence Service, *Preparatory Study for Eco-design Requirements of EuPs, Lot 1: Refrigerating and Freezing Equipment: Service Cabinets, Blast Cabinets, Walk-in Cold Rooms, Industrial Process Chillers, Water Dispensers, Ice-Makers, Dessert and Beverage Machines, Minibars, Wine Storage Appliances and Package Condensing Units*, (Final Report May 2011).

<sup>5</sup> Environmental Investigation Agency, *Chilling Facts IV: HFC-Free Cooling Goes Mainstream* (July 2012).

package, it is not in itself sufficient, and gives ample opportunity for non-compliance and over-allocation of quotas while providing little pressure on laggard sectors.

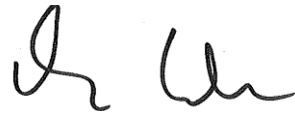
Outside commercial interests should not be allowed to dictate EU climate policy. The Commission must stand strong against the self-interest of multinationals that simply seek to delay meaningful action in order to boost profits at the expense of the climate system and smaller European companies making alternatives that have much to gain by early EU action. At this critical stage in the proceedings we look to you to provide leadership and a positive outcome for the climate.

Yours sincerely,



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**Julian Newman**  
Environmental Investigation Agency  
Campaigns Director



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**Jeremy Wates**  
European Environmental Bureau  
Secretary General



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**Andrea Kohl**  
WWF – European Policy Office  
Programme Director



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**Jürgen Resch**  
Deutsche Umwelthilfe  
Chief Executive Officer



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**Wendel Trio**  
Climate Action Network Europe  
Director



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**Jorgo Riss**  
Greenpeace European Unit  
Director



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**Eva Filzmoser**  
CDM Watch  
Director



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**Durwood Zaelke**  
IGSD  
President



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**James Thornton**  
ClientEarth  
Chief Executive Officer