

Feedback on the Roadmap regarding the 'Review of EU rules on fluorinated greenhouse gases'

Bundesindustrieverband Technische Gebäudeausrüstung e. V. (BTGA)

Fachverband Gebäude-Klima e. V. (FGK)

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The Bundesindustrieverband Technische Gebäudeausrüstung - BTGA e.V. and the Fachverband Gebäude-Klima - FGK e.V. support the review of EU legislation on Fluorinated Greenhouse Gases initiated by the European Commission. This review of the F-gas Regulation shall establish effective measures and instruments at European level to improve the implementation and enforcement of the Regulation. BTGA and FGK support a unified European approach to prevent illegal trade and use of fluorinated greenhouse gases in the European Union: Only a European solution can prevent member states from implementing individual national legislation, such as that of the German Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (<https://www.bmu.de/gesetz/referentenentwurf-eines-gesetzes-zur-bekaempfung-des-illegalen-handels-mit-fluorierten-treibhausgasen/>). National legislation will jeopardize the common market and will lead to distortions of competition within the European internal market.

In addition, we recommend that the GWP values used for calculating the CO₂ equivalent shall be adjusted dynamically to the currently valid Assessment Report (AR) to avoid misunderstandings in use.

The revised F-gas Regulation should ensure a high level of safety through strict application and link to EU safety directives (i.e. Low Voltage Directive, Machinery Directive, Pressure Equipment Directive and General Product Safety Directive). Additionally the review shall consider the updated EU harmonized and international standards. Adequate training of installers and maintenance companies including also non HFC-refrigerants ensures a safe and low emitting product and installation.

About the BTGA e. V.

The Federal Industrial Association for Technical Building Installations and Services (BTGA) unites the industrially oriented, plant engineering companies with their own engineering capacities. The BTGA organisation incorporates eight regional associations as well as direct and sponsoring members and comprises around 440 large and medium-sized companies. The BTGA member companies generated a total of 8,9 billion euros in 2018 and employed 43.300 people. The BTGA represents the interests of the branch and, in cooperation with its bodies and committees, continuously monitors technical, social, economic and environmental economic developments. The association's work focuses on technology, vocational education, tariff and social policy, economics, law, standardisation, public relations and public affairs.

About the FGK e. V.

Since its foundation 50 years ago the Association of air conditioning and ventilation in buildings (FGK) evolved to the leading branch association of the German air-conditioning and ventilation industry. The FGK represents the interests of its members towards the market partners, politics, economy, standardisation bodies and the scientific community. The FGK-members count about 49.000 employees and generate a total revenue of about 7,1 Billion Euro per year. The FGK has about 300 member companies, mainly technical planers and consulting engineers, component manufacturers, distributors, plant manufacturers, facility managers, associations and institutions.