

Brussels, 19 November 2013

Joint Statement

REVIEW OF THE FLUORINATED GREENHOUSE GASES REGULATION

EuroCommerce – representing the European retail, wholesale and international trade sectors - and UEAPME – representing the crafts, trades and SMEs in Europe - wish to draw your attention to our joint concerns over the progress of the proposed review of the F-gases Regulation.

Our members support the overall aim to reduce the emissions of greenhouse gas emissions, and gradually replace them with safe and energy efficient alternatives. However, as the proposal currently stands, we fear that the burden on operators - the majority of which are SMEs - is vastly disproportionate.

Service and maintenance ban

As stated in the European Commission's Business Impact Assessment, HFC technology and especially R404a remains state of the art technology for commercial refrigeration in Europe. It is therefore essential to find a deadline for the use of existing refrigeration equipment, which could represent a sensible compromise between technical feasibility and environmental protection.

The proposals to ban the service and maintenance of equipment with a Global Warming Potential of 2500 or more (article 11.3) as of January 1, 2017 (as suggested by the environment committee of the European Parliament), or as of January 1, 2020 (as suggested by the European Commission) are simply unrealistic considering the number of appliances that will need to be retro-fitted.

A pragmatic approach is essential.

UEAPME and EuroCommerce consider that the proposal of the European Council to postpone the deadline to ban the use of refrigeration equipment with a GWP of 2500 or more, until at least 1 January 2022, is a sensible one. We therefore, urge all Member States to maintain at least the 2022 deadline, and not to compromise on this **absolute priority for the commerce sector and its suppliers, the temperature controlled storage and logistics companies.**

No one size fits all

Refrigerants should only be prohibited when appropriate substitutes are available on the market, and compatible with the technical specifications of existing cooling systems.

Due to the state of technology, it is not possible to implement the same systems everywhere in the EU. We therefore call onto the EU institutions to properly consider the impact of the proposed Regulation on all European Member States to **ensure that countries with warmer climates are not disproportionately affected, and may benefit from exemptions if appropriate** (article 11 and Annex III).

Allocation fee

UEAPME and EuroCommerce support the **complete deletion of the provision on the allocation fee (article 14a new)**. Even though the fee was addressed to producers and importers, it would be indirectly charged onto operators of equipment, many of which are SMEs.

The F-gases Regulation is a fundamental piece of legislation for the commerce sector. Imposing disproportionate expectations and excessive burdens on companies in the short-term is not the way to build a sustainable and economically viable commerce sector for the long-term. Therefore, considering the impact on commerce companies, especially SMEs, we believe that they should be granted more time to properly budget for and implement the necessary changes. Also, there should be time enough for new and more sustainable technologies to be tested, proven reliable, and available to the sector as viable and affordable alternatives.

We therefore call on the EU policy-makers to rethink their approach (especially as regards the servicing and maintenance ban) in order to reach an agreement which would be beneficial for businesses and society as a whole.

About EuroCommerce :

EuroCommerce represents the retail, wholesale and international trade sectors in Europe. Its membership includes commerce federations and companies in 31 European countries.

Commerce plays a unique role in the European economy, acting as the link between manufacturers and the nearly 500 million consumers across Europe over a billion times a day. It is a dynamic and labour-intensive sector, generating 11% of the EU's GDP. One company out of three in Europe is active in the commerce sector. Over 95% of the 6 million companies in commerce are small and medium-sized enterprises. It also includes some of Europe's most successful companies. The sector is a major source of employment creation: 31 million Europeans work in commerce, which is one of the few remaining job-creating activities in Europe. It also supports millions of dependent jobs throughout the supply chain from small local suppliers to international businesses.

About UEAPME:

UEAPME is the employers' organisation representing exclusively crafts, trades and SMEs from the EU and accession countries at European level. UEAPME incorporates around 80 member organisations from 34 countries consisting of national cross-sectorial SME federations, European branch federations and other associate members, which support the SME family. UEAPME represents more than 12 million enterprises, which employ around 55 million people across Europe. UEAPME is a recognised European Social Partner. It is a non-profit seeking and non-partisan organisation.