

We need to think carefully about what we say and do



Who is 'the industry'? That is a question that has become very apt in the past week, as all the trade associations, interest groups and campaigners put their heads together to provide input into the review of the F-Gas regulations.

These planned reviews and revisions of European regulations are designed to be a useful pause for reflection, to judge whether the laws that have been implemented have achieved their goals, or whether they need to be made tougher to achieve a better result. Yes, theoretically it is also an opportunity to make a regulation less tough, but who can remember that ever happening?

So it hasn't been surprising that this latest review of the F-Gas rules has seen a number of views of what the 'industry' would like to see from the next iteration of the regulation. This is a chance, no less, than to determine cooling's future. There is a clear consensus, as you will see from p6-7 that a change to the regime around reporting and enforcement is needed, in order to clamp down on the scourge of illegal imports.

What has been made clear is that the cooling industry is not of a consensus on everything. None of us were surprised for instance, that the Environmental Investigation Agency has asked for all the regulations to be made much more stringent.

But, the astute of you will note, the EIA doesn't have to bear the financial cost or face the upheaval of any radical changes, so many who work within cooling believe that it is important that the 'working industry's' views are given appropriate weight. This, is, after all, what happened when this current set of F-Gas rules was being

drafted – here the European Parliament's more radical green elements were ultimately reined in by more reasoned voices, following much lobbying by the industry.

So in that context, the issuing of a study that claims to represent 'the industry', but which is in fact manifestly the gathering of a range of people with a particular viewpoint, is a very dangerous prospect.

You will see on p5 the furore that has been created by the shecco study that shows *more than eight out of ten* respondents want much tougher bans brought in. The furore comes from the fact that this cohort is almost exclusively drawn from those who promote natural refrigerants – and that clearly this sector of the cooling population has an obvious vested interest in accelerating the exit of HFCs – and at the same time tightening GWP so that current HFO 'low-GWP' options cannot be used either.

Now, as you should know by now,

The cooling industry is not of a consensus on everything

RAC is determinedly 'refrigerant-agnostic' so we love naturals as much as the next man or woman. But we also promote low-GWP refrigerants of the HFO variety too – particularly where they provide solutions that are cost-effective.

The danger of this study is that if the European Commission believes that this represents the view of the entire industry, it could determine a future that a very large section of cooling certainly does not want.

By all means let's find ways to incentivise naturals, but not at the expense of the alternatives. That isn't speaking for 'the industry', that is speaking for self-interest.

Thus it is essential that the Commission provides the reasoned response that is being called for. And it is vital that all sectors of the industry work together, not in opposition to determine a sustainable future for the whole cooling industry.

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