

## Surveying the HVACR Industry on Illegal HFC Trade in the EU

### Introduction

In response to multiple media articles<sup>i</sup> reporting on large-scale illegal HFC use in Europe, the Environmental Investigation Agency (EIA) is surveying the European heating, ventilation, air conditioning and refrigeration (HVACR) industry to understand the current situation and explore measures to be taken to ensure effective implementation of the EU F-Gas Regulation.

The survey aims to:

- Collect data and views on the scale and severity of illegal HFC use;
- Understand the drivers behind the increased illegal activity; and
- Understand awareness of current penalty regimes in Member States and potential improvements that could be made to ensure enforcement of F-Gas Regulation provisions.

The survey is being sent to 150+ HVACR associations, refrigerant distributors, consultants and contractors. A summary of the results will be published in November 2018. Please indicate in your response whether any or all of your submission is confidential.

Please complete the survey, providing as many details as possible by 3 October 2018 and return to Sophie Geoghegan ([sophiegeoghegan@eia-international.org](mailto:sophiegeoghegan@eia-international.org)). Please do not hesitate to contact Sophie at EIA by telephone (+44(0)207 3547960) or by email with any questions or clarifications concerning the survey.

### Introduction

Name / position:

Company Name:

Country:

Email / Tel:

1. Please state the price at which you currently sell the following refrigerants and how much you sold them for 12 months ago. If not possible, please indicate the percentage change in prices over the past year.

- 404A
- 410A
- 134a
- 1234yf
- 407C
- 407F

2. Have you experienced any refrigerant supply problems in the last 12 months (please describe)?

3. Have any of your members/clients expressed concern about refrigerant supply or price problems in the last 12 months (please describe)?

4. Are you aware of or suspect ongoing illegal HFC use (non-quota HFC use or illegal cross-border trade) in the sector/country you work in (please give as many details as possible)?

5. Are you aware of any cases of HFC theft in the past 12 months (please describe)?

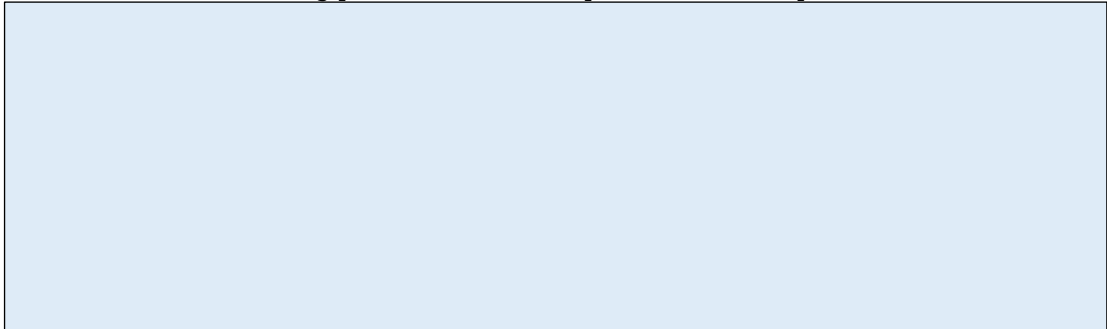
6. Are your clients/members aware that the use of disposable cylinders is illegal in Europe?

7. Have you seen or heard of refrigerants in disposable cylinders on the market or seen any in use (please give details, and any relevant links or images)?

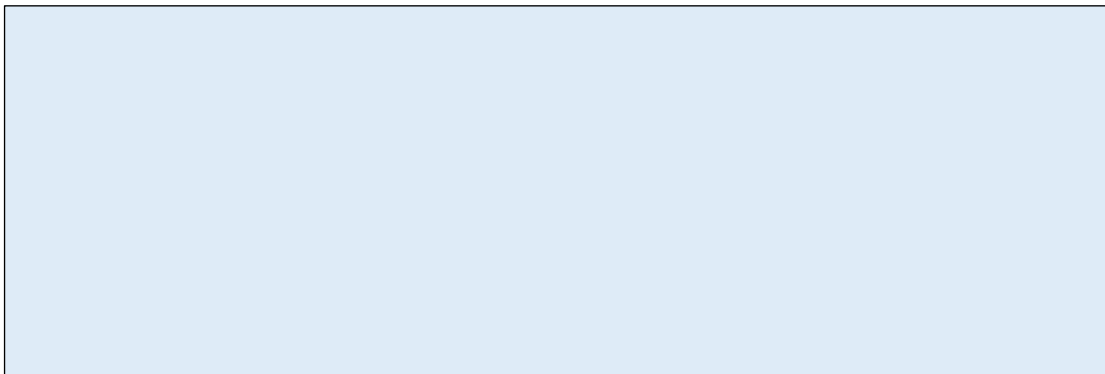
8. In your view, are your clients/members adequately aware of the impact of the 2018 reduction step under the HFC phase-down, which reduced HFC supplies by 37% (in CO<sub>2</sub> equivalence) as well as the other measures under the EU F-Gas Regulation?

9. Is there an adequate supply of affordable low-GWP alternatives in your area/sector for your clients to make the necessary transitions required to comply with the EU F-Gas Regulation?

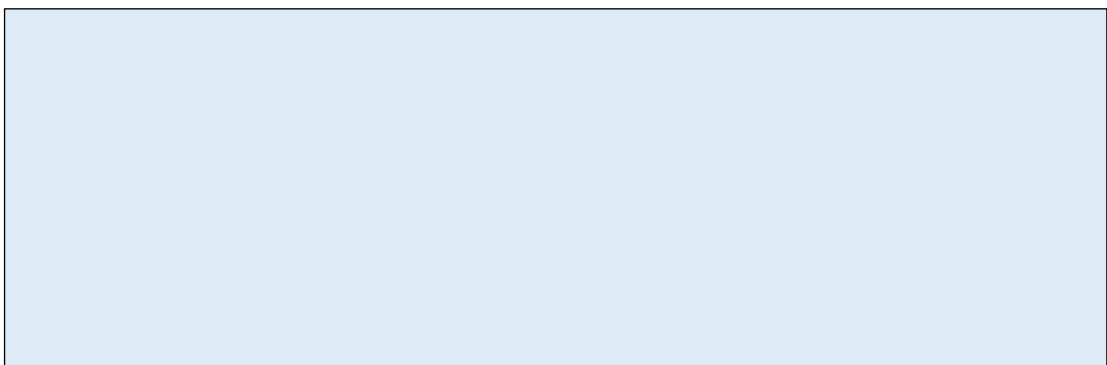
10. Are you aware of any actions your national government is taking to tackle illegal trade of HFCs including prosecutions and penalties? If so please describe.



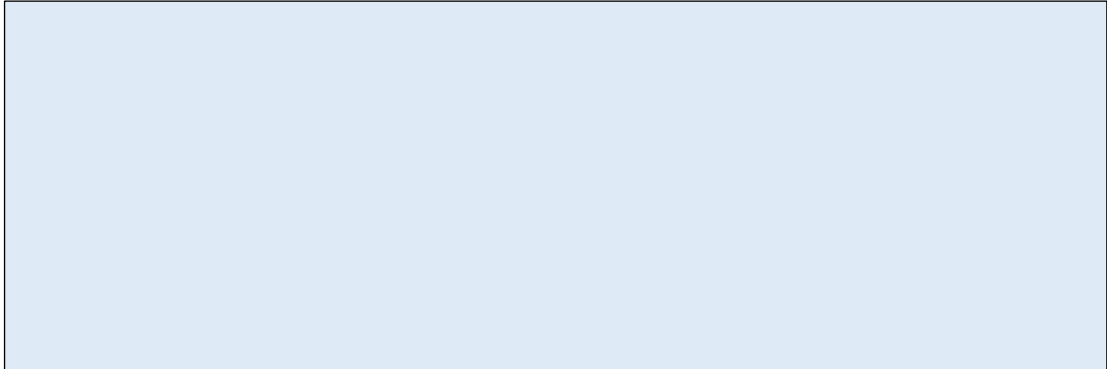
11. In your view, what more should your government do to ensure compliance with the EU F-Gas Regulation? Please include any comment on the efficacy of current penalties to deter illegal use and trade.



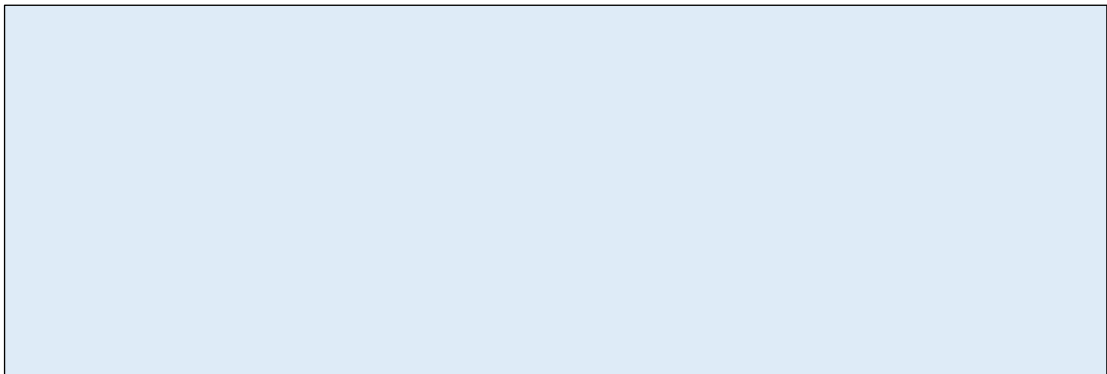
12. What further steps should industry be taking to tackle illegal HFC use and ensure compliance with the EU F-Gas Regulation?



13. Do you think an HFC licensing system (for example similar to the HCFC licensing system) would improve compliance with and enforcement of the EU F-Gas Regulation?



14. Is there anything else you would like to let us know?



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<sup>i</sup> See for example <https://www.coolingpost.com/world-news/area-raises-illegal-refrigerant-concern/>;  
<https://www.coolingpost.com/world-news/icool-acts-on-illegal-refrigerant-sales/>;  
<https://www.coolingpost.com/world-news/german-ebay-awash-with-illegal-r134a/>;  
<https://www.coolingpost.com/world-news/poland-swamped-by-illegal-refrigerant/>;  
<https://www.coolingpost.com/world-news/illegal-refrigerant-costs-greece-e20m/>;  
<https://www.coolingpost.com/world-news/phase-sparks-rise-illegal-sales/>; <https://www.coolingpost.com/uk-news/uk-hub-illegal-refrigerant-sales/>