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EFCEM COMMENTS ON THE COMMISSION PROPOSAL TO REVISE THE F-GAS REGULATION

EFCEM, the European Federation of Catering Equipment Manufacturers represents manufacturers of commercial kitchen equipment.

In this paper we would like to present our view by the current revision of the F-Gas Regulation (842/2006) document (COM(2012)0643) and in particular on issues that are of great concern to our industry.

We would like to express our concerns on the introduction of modifications that have the potential to distort the EU single market; the competition ground for our members, in particular for small and medium enterprises. It will also prevent products being placed on the market and result in the closure of companies who produce specific types of refrigeration equipment used in commercial kitchens.

Phase down for blast chillers and blast freezers for use in commercial kitchens

Although governed by national food hygiene temperature requirements the products that EFCEM has concerns with are as follows:-

Blast chillers are appliances designed to rapidly reduce the temperature (in less than 2 hours) of cooked foodstuff at a temperature from 65°C to a temperature equal or lower than + 10°C.

Blast freezers are appliances designed to drop, in less than 4,5 hours, the temperature of cooked foodstuff at a temperature from 65°C to a temperature equal or lower than -18°C.

Blast chillers and blast freezers are extensively used in both the commercial foodservice sector (e.g. hotels, restaurants, fast food, etc) and the social foodservice sector (hospitals, schools, public buildings, etc.).

Such products help in preserving the quality and the hygiene of food and are a fundamental part in the cook&chill/cook&freeze catering system and thus are essential for health of consumers.

The use of blast freezers and blast chillers is growing, although they account for less than 10% of the total number of freezers and chillers produced in the E.U. that are used in commercial kitchens. Due to this limited penetration of this important product group in the European market, it is considered that their contribution to the overall quantity of FGas emitted is negligible.

In addition it shall be considered that nearly 50% of blast chillers and blast freezers placed on the EU market are currently produced by small/medium enterprises.

Blast freezers and blast chillers are actually equipped with refrigerating gases (definition R134a or R404a) that according to the Table in Annex III item 11 of the draft revision of Fgas Regulation (excerpt as follows):

11. Refrigerators and freezers for the storage, display or distribution of products in retail and food service ("commercial use") - hermetically sealed systems	that contain HFCs with GWP of 2500 or more	1 January 2017
	that contain HFCs with GWP of 150 or more	1 January 2020

shall not be present in products placed on the market, respectively from 1st January 2017 and 1st January 2020, depending on their GWP.

For blast freezers that may use, due to their volume, a quantity of HFC with GWP of 2500 or more, no alternative refrigerating gas is available on the market.

For blast chillers that may use, due to their volume, a quantity of HFC with GWP of 150 or more, only one alternative refrigerating gas is available on the market and it is produced by only one supplier.

Use of flammable refrigerating gases as possible alternative to the refrigerating gases that are intended to be banned, is not feasible as the safety limits (max 150g) forbid the use of such gases.

Due to the above reasons, if the regulation is enacted **it will not be possible for blast freezers to be produced after 1st January 2017.**

For blast chillers, even if a solution were to be available for their production after 1st January 2020, **the availability of the refrigerating gas through only one supplier will expose all manufacturers to undue pressure and unbalanced situation on the market.**

The situation will be worsened if the Amendments 27, 44 and 45 from the Rapporteur, Mr. Eickhout, who proposes a more stringent reduction of the date of prohibition, should be accepted.

EFCEM calls for an exemption of blast chillers and blast freezers that are used in commercial kitchens, from the revised Regulation on FGas and in particular from Article 9.1, Article 9.2, Article 11.3 and Annex III of such revised Regulation.

EFCEM calls for there to be no further development of this regulation in relation to blast chillers and freezers until such time as there are suitable alternative gasses commercially available on the European market.

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European Federation of
Catering Equipment Manufacturers

EFCEM federation was founded in 1969 and includes the key European national associations and the key European manufacturers in its membership.

The total turnover of the 600 companies who are represented by EFCEM national associations amounts to over €5.5 billion and their products range from cooking, refrigerating and dish washing appliances, to utensils to full professional kitchen schemes.