

**Response to the EPEE statement 'Confidence in Standards is critical according to EPEE Brussels – May 21, 2002'**

May 28 2002 - Comment by Chris Rose, author of MIPIGGs special report on the standards issue – (at [www.mipiggs.org/library/pdfs/3standards.pdf](http://www.mipiggs.org/library/pdfs/3standards.pdf))

The EPEE statement totally fails to address the main issues at stake. Here are three examples:

1. HFCs are a problem

For instance it wrongly implies that HFCs will not be a major environmental problem – but they already are.

Thus it states that 'HFCs are typically non-flammable, but they contribute to the Greenhouse Effect when released into the atmosphere ... the revised EN 378 addresses this issue by setting strict requirements in respect of emission prevention through leakage control, recovery and recycling, as well as certification of maintenance engineers'.

Experience with HCFCs and CFCs, and the evidence of rapidly escalating concentrations of HFC-134a for example, shows that this is wishful thinking at best and disingenuous at worst. Containment does not happen – HFCs do reach the atmosphere. The IPCC's most recent major report notes that HFC-134a is increasing in atmospheric concentration 'almost exponentially'.

2. Standards

Regarding standards and open-ness it claims:

'The development and revision of standards at both European (CEN/CENELEC) and international level (ISO/IEC) is an open and fully transparent process which encourages the participation of all groups and stakeholders interested in a particular subject.'

This is not borne out by practice. The details of committees membership and meetings are kept secret and major NGOs such as Greenpeace, which do work on these issues, have no say in setting standards.

3. Environmental policy

The EPEE state: 'standards are not intended to pursue environmental policies'. The issue here is whether standards are being used to undermine environmental policies – and in this case that is clearly so. The industrial standards setting process is way beyond effective political control\* or accountability and thus industrial interests – which in this case happen to be the f-gas manufacturers – are able to avoid the thrust of environmental policy by fixing standards to their own ends. We have not analysed the terms of reference of the standards bodies or processes in detail but it is clearly essential that they do not operate in a way that is incompatible with environmental objectives: they must neither over-ride nor undermine them, nor must they create de facto environmental policy by default.

\* For a political perspective see the Adjournment Debate in the UK House of Commons, led by Jane Griffiths MP (Reading, East) on 24 May

Extracts from her speech (Hansard 24 May 2002):

"My main concern is to expose an international fix that is designed to prop up the right of an industry—the refrigeration and air conditioning industry—to pollute, and to block the progress of a green alternative technology. The industry is dominated by hydrofluorocarbon interests. Some might think that area rather technical, and be tempted to dismiss the matter as a side issue, but in fact it is crucial to our success in delivering on our Kyoto targets. HFCs are extremely powerful global warming gases. On average, they have 2,274 times the global warming potential of carbon dioxide. It is no surprise, therefore, that Kyoto included HFCs among the emissions that must be reduced to stop global warming. The UK fully recognises the pollution potential of HFCs, and the Government's stated position is clear. According to "Climate Change: the UK Programme", published in November 2000: "HFCs should only be used where other safe, technically feasible, cost-effective and more environmentally acceptable alternatives do not exist . . . HFCs are not sustainable in the long term . . . HFC emissions will not be allowed to rise unchecked." According to the same document, alternative technologies do exist to counter what the Government identify as a "steep upward trend in emissive uses of hydrofluorocarbons". For example, in Germany, which has some of the strictest health and safety standards in the world, about 95 per cent. of domestic refrigerators use hydrocarbons. HCs have negligible global warming potential. They are flammable, but the technology is well proven and safe. After 70 million operational years in Germany, not a single accident has taken place. In October 2000, the Department of Trade and Industry commissioned the Swann Report, entitled "The Public Policy Interest in the UK in Standardisation". It stated: "Standards can be used to create trade barriers as well as to remove them. It is important for government to work against the danger of standards being used to create trade barriers, but rather to promote the very beneficial effects of standardisation." Professor Swann was right to identify this potential generic problem with standard setting. Turning to product standards for refrigeration, there are four key European and international standards committees, including the CEN—the European Standardisation Committee and the ISO, the International Standard Organisation. The HFC industry predominates, with majorities over rival HC manufacturers and users of 12:4, 9:3, 12:0 and 15:4. The TC182 committee is overwhelmingly dominated by HFC interests, and is chaired by a consultant for the American Air-Conditioning and Refrigeration Institute, which has a formal policy against the use of HCs. That committee has proposed a standard for hydrocarbon air conditioning that would outlaw 80 per cent. of units currently in use, and which would also cover refrigeration equipment. The introduction of such requirements would have the same effect on commercial refrigeration equipment for supermarkets, convenience stores, pubs, restaurants and so on, for which similar restrictions would apply. A review meeting in Switzerland is scheduled for early June, but it is still likely to be HFC-dominated, with the HC voice either not heard or overridden. The

refrigerant charge in air conditioning is relatively large. If that sector of the market is shut off to HCs, it will remove most of the incentive for market entrants to invest in the cleaner technology. That offends against a sense of British fair play. As I said, Professor Swann underlined how important it is for the Government "to work against the danger of standards being used to create trade barriers". ...

... "I understand that a better regulation action plan will be published soon by the EU and that the European Parliament will be urged to devolve some of its responsibilities to self-regulating industries. In principle, that sounds good, but, as the evidence shows, self-regulation is in practice subject to anti-competitive abuse. What signals does that send? What confidence can we have in such a well intentioned process if it is manipulated by vested interests against market entrants, against innovation and against the environmental policies of several EU Governments, including our own? It will not be good enough for Governments and Ministers to wash their hands of the matter by claiming nobility of intent. Far from being self-standing, the process will be tarred as self-seeking. What are the Government doing to protect the honour of better regulation and self-regulation from flagrant manipulation? If that move is left unchecked, the losers will not only be the HC manufacturers—for whom I hold no brief—but the integrity of the CEN and the better regulation initiative. The global environment will continue for generations to pay the price exacted by greenhouse gas manufacturers clever enough to manipulate the system."