

F gas Regulation in Great Britain: Reform of the HFC phasedown Consultation

November 2025



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Any enquiries regarding this publication should be sent to us at fgas@defra.co.uk

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Consultation Process

How to respond

Please respond to this consultation in one of the following ways:

• Online via Citizen Space consultation hub: https://consult.defra.gov.uk/fluorinated-gases-and-ozone-depleting-substances-policy-team/f-gas-regulation-in-great-britain

Citizen Space is an online consultation tool. We strongly encourage that responses are made via Citizen Space as using the online survey greatly assists our analysis of the responses. Alternative options are provided below if required:

- By email to fgas@defra.gov.uk
- Written responses by post, specifying which questions you are responding to:

F gas Regulation in Great Britain: Consultation Domestic F gases and ODS Team Defra 1st Floor, Seacole Building 2 Marsham Street London SW1P 4DF

Please note, any responses sent by post must have arrived at the above address by the closing date of the consultation in order to be considered. Unfortunately, we cannot analyse any responses received after this date. To ensure your response is included in the analysis, please consider responding online via Citizen Space.

When you reply, please confirm whether you are replying as an individual or submitting an official response on behalf of an organisation and include:

- your name
- your position (if applicable)
- the name of organisation (if applicable)

Duration

Responses should be received by 11:59pm on 17 December 2025. This is a six-week consultation.

Complaints procedure

All complaints about the consultation process should be submitted to the Consultation Coordinator via email: consultation.coordinator@defra.gov.uk. To meet with Defra's service standard, all complaints will be responded to within 15 days of receipt.

Using and sharing your data and information provided

Information and comments submitted through this consultation will be used to inform our consideration of next steps. A report summarising responses and an outline of next steps will be published on gov.uk following the conclusion of the consultation.

How we use your personal data is set out in the consultation and call for evidence exercise privacy notice which can be found here:

https://www.gov.uk/government/publications/defras-consultations-and-call-for-evidence-exercises-privacy-notice

In taking forward policy development following this consultation, in addition to the Department for Environment, Food and Rural Affairs, consultation responses will be shared with Department for Energy Security and Net Zero, the Department for Business and Trade, the Ministry of Housing, Communities and Local Government, HM Treasury, and the Scottish and Welsh Governments as needed.

There may be occasions when Defra will share the information you provide in response to the consultation, including any personal data, with external analysts. This is for the purposes of consultation response analysis and provision of a report of the summary of responses only.

Additionally, responses may be shared with the Environment Agency, as administrator and operator of aspects of the F gas regulatory system in Great Britain, so that any future regulatory measures following this consultation are developed and implemented in a coordinated manner.

Other Information

This consultation is being conducted in line with the Cabinet Office "Consultation Principles" and be found at: Consultation Principles.docx (publishing.service.gov.uk).

Introduction

What are F gases?

Fluorinated gases (F gases) are a family of manufactured gases used in a range of industrial, commercial and domestic applications. Following regulatory measures to phase out ozone depleting substances (ODS) pursuant to the Montreal Protocol on Substances that Deplete the Ozone Layer (the Montreal Protocol), F gases were often introduced as a replacement for ODS. Whilst not ozone-depleting, F gases are powerful greenhouse gases, with a global warming potential (GWP)¹ that can be up to 22,800 times higher than carbon dioxide. The GWPs mentioned in this document are derived from the International Panel on Climate Change's Fourth Assessment Report. Those GWPs are reflected in Annex 1 of the F gas Regulation.

F gases contributed to 1.83% of greenhouse gas emissions across the UK in 2023 and fall into four groups: hydrofluorocarbons (HFCs), sulphur hexafluoride (SF6), perfluorocarbons (PFCs) and nitrogen trifluoride (NF3).² HFCs are the main group of F gases, forming 93.7% of UK 2023 F gas emissions,³ with by far the largest use of HFCs being as a refrigerant within the refrigeration, air conditioning and heat pumps (RACHP) sector (79.5% of HFCs).⁴ Other sources of F gas emissions are from metered dose inhalers (MDIs), gas-insulated switchgear in the power sector, foams, fire protection systems, aerosols and other technical uses.

¹ The GWP of a gas is defined as its warming influence in relation to that of carbon dioxide over a 100-year period.

² <u>Final UK greenhouse gas emissions national statistics: 1990 to 2023</u>. Final greenhouse gas emissions 2023 – Table 1.1.

³ <u>Final UK greenhouse gas emissions national statistics: 1990 to 2023</u>. Final greenhouse gas emissions 2023 – Table 1.1.

⁴ <u>Final UK greenhouse gas emissions national statistics: 1990 to 2023</u>. Final greenhouse gas emissions 2023 – Table 1.6.

F gas legislation in Great Britain

In Great Britain (GB), F gases are regulated through assimilated legislation including the <u>Regulation on Fluorinated Greenhouse Gases</u> (the F gas Regulation)⁵. The main objective of the F gas Regulation is to reduce F gas emissions.

The F gas Regulation sets out the HFC phasedown: measures which cap and progressively reduce the overall maximum quantity of HFCs placed on the market in Great Britain for the first time, from production and imports. Key provisions are in Article 15 and Annex 5⁶ of the F gas Regulation. Annex 5 of the Regulation sets out the current phasedown schedule and additional steps to establish the maximum quantity of HFCs that can be placed on the market. The phasedown schedule sets steps that, by 2030, reach a 79% reduction of HFCs placed on the market compared to the baseline. The baseline is determined as the annual average of the total quantity of HFCs placed on the market during the baseline period, which is 2015-2019.

Within the limits of the overall HFC cap and phasedown, quota is allocated annually to producers and importers pursuant to Article 16 of the F gas Regulation. Quota allocations are based on carbon dioxide equivalent (CO2e)⁷, and set an annual limit on the quantity of HFCs which can be placed on the market. Those allocations are reduced over time.

The phasedown initially applied only to bulk gas but from 1 January 2017, refrigeration, air conditioning and heat pump equipment charged with HFCs could not be placed on the market unless the HFCs in that equipment were accounted for within the quota system (as set out in Article 14(1)). As a result, quota authorisations are required for placing precharged equipment on the market, and equipment importers must receive sufficient quota authorisations, from a quota holder, to cover the HFCs contained within the pre-charged equipment. The process for transferring quota and authorisations is set out in Article 18.

While allocated annual quota must be used within the calendar year, quota authorisations do not have a time constraint and once authorised can be used at any time. In terms of reporting for quota authorisations, the quota is deemed to be placed on the market at the time of authorisation (Article 18(2)), not at the point of placing the pre-charged equipment

⁵ As part of the process of leaving the EU, EU F gas legislation, including Regulation (EU) No 517/2014 of the European Parliament and of the Council, was assimilated into UK law with technical amendments made to ensure the legislation functions properly as UK domestic law.

⁶ In this document we refer to Annex V of the F gas Regulation as "Annex 5".

⁷ CO2e is a measure of how much a gas contributes to global warming, relative to carbon dioxide.

on the market. As there is no time constraint on quota authorisations, they can be 'banked' and can accumulate over time.

There is a significant bank of quota authorisations and delegations within the GB F gas system (approximately 9.4 MtCO2e in 2023) that carries over in perpetuity until consumed. The UK's exit from the EU has a bearing on the scale of the GB quota authorisation bank. To mitigate the impact on the market in GB of leaving the EU, Article 18(2) of the F gas Regulation included provisions enabling unused EU quota authorisations and delegated quota authorisations issued prior to EU exit to be used in the market in GB, instead of the EU market. 8.9MtCO2e of unused quota authorisations and delegations was transferred into the GB HFC Registry from the EU HFC Registry in 2021. The GB quota annual utilisation rate is recorded as 89.4%, 79.1% and 71.5% for 2021, 2022 and 2023 respectively.

In general, F gas policy includes devolved and reserved policy matters with devolution questions determined by reference to relevant legislation. The UK, Scottish and Welsh governments work together to run a GB-wide F gas system and arrangements are in place, underpinned by a Common Framework. Under these arrangements, the Environment Agency are responsible for administering and operating aspects of the GB F gas system on behalf of the UK, Scottish and Welsh governments. Other regulators, including the Scottish Environment Protection Agency and Natural Resources Wales, also have responsibilities including in relation to compliance and enforcement.

Consultation on HFC phasedown reform

This consultation focuses on specific proposals for HFC phasedown reform. We propose changing the HFC phasedown in the F gas Regulation by adjusting the existing schedule from 2027 and adding further steps from 2030 until 2050. Those adjustments would mean revising the end target of the phasedown – i.e. replacing the 79% reduction by 2030 target with a 98.6% reduction by 2048 target. Alternative approaches are considered in more detail in the De Minimis Assessment, and would mean final reductions of between 97.6 – 100%, with options with less ambitious phaseout trajectories likely generating lower costs to businesses but being less environmentally beneficial, and vice versa. The rationale for and further details of the proposal are set out below.

The following sections set out the background to this consultation, what is not in scope of the consultation, the details of our proposal and questions relating to our proposal.

Background

International obligations

Since entry into force of the original F gas Regulation in 2014, further international action has been taken to address the use of F gases, specifically HFCs.

The UK is a Party to the Montreal Protocol and has ratified the Kigali Amendment. The Kigali Amendment sets out phasedown schedules and associated baseline years for the production and consumption of HFCs for Parties which have ratified it. Under this Amendment, the UK is required to reduce HFC production and consumption by 85% by 2036.

The F gas Regulation forms a core part of the UK's implementation of its obligations pursuant to the Kigali Amendment and the phasedown under the Regulation has led the UK to be currently well ahead of the Kigali Amendment schedule. While the UK is ahead of schedule, the F gas Regulation's 79% phasedown target would not fully implement Kigali Amendment provisions to reduce production and consumption by 85%. Reform of the phasedown is therefore needed to address this.

Domestic commitments

The UK and devolved governments are committed to bringing greenhouse gas emissions to net zero. HFCs have a role to play in ensuring that net zero objectives are met across the UK and further ambition on HFCs is needed to support this.

Northern Ireland and EU legislation

In 2024, the EU repealed previous EU F gas legislation and passed new legislation. The 2024 EU F gas Regulation⁸ includes (in its Annex 7) a revised HFC phasedown from 2025 that ends in a complete phaseout by 2050. There are review provisions, including in relation to phaseout (Article 35(6)). The revised EU HFC phasedown moves away from a percentage phasedown approach and instead sets a maximum quantity (in tonnes of CO2e) for each phasedown step. The 2024 EU F gas Regulation also provides the European Commission with powers to make delegated acts to amend, if needed, the HFC phasedown schedule so that it can introduce quota specifically for heat pump deployment (Article 17(7)).

Under the terms of the Windsor Framework, Northern Ireland (NI) continues to apply EU F gas legislation as part of its dual market access to the EU and the rest of the UK internal market. We do not anticipate that the proposal will impact the movement of goods between GB and NI or impose significant new burdens on businesses in NI because the proposal aims to adjust the existing system rather than establish a completely new system. As is currently the case, businesses will continue to be able to place equipment pre-charged with HFC gas on the market in NI which comes from GB, in line with existing requirements under the 2024 EU F Gas Regulation. As noted, the European Commission has delegated powers to amend, if necessary, the EU HFC phasedown schedule to take into account potential demand for heat pump rollout. Our initial assessment is that the projected demand in NI for HFCs resulting from heat pump installations there could be accommodated under existing EU quota levels. Businesses will also still be able to import bulk HFC gas into NI if they hold sufficient EU quota. Similarly, as is currently the case, movements into GB will continue to need to meet the GB rules on quota and quota authorisations in assimilated F has legislation. Guidance on the rules for such movements is available on gov.uk.

Assessment of the F gas Regulation

The F gas Regulation contains a legal requirement to review the effects of the Regulation (by the end of 2022). Defra led a joint review, on behalf of UK, Scottish and Welsh governments, to assess the impact of the F gas Regulation and published an <u>assessment report</u> in December 2022. The review concluded that the Regulation is succeeding in its main objective, <u>reducing estimated cumulative emissions in GB by 20.7 million tonnes of carbon dioxide equivalent (MtCO2e) average annualised between 2014-2023</u>. This represents an 18% reduction in total accumulative F gas emissions across these ten

⁸ Regulation (EU) 2024/573 of the European Parliament and of the Council of 7 February 2024 on fluorinated greenhouse gases, amending Directive (EU) 2019/1937 and repealing Regulation (EU) No 517/2014

years. The assessment measured monetised gross benefits at £1.9 - 8.5 billion and total costs at approximately £118 million. The primary driver of this success has been the HFC phasedown for GB.⁹ 10

The report also highlighted that there are aspects of the Regulation which could be strengthened, revised or amended. The proposal in this consultation has been informed by these recommendations, as well as taking into consideration domestic net zero commitments and international obligations.

The Assessment Report also stated that the HFC phasedown will need to be extended to ensure continued implementation of the Kigali Amendment, which requires a phasedown in consumption (as defined in the Montreal Protocol) by 85% by 2036. Such an extension will further support delivery of net zero commitments across the UK. The 2022 assessment report¹¹ and modelling to support policy development¹² have suggested there is scope to be even more ambitious with the HFC phasedown than required to meet the Kigali Amendment's 2036 target. A more ambitious phasedown could help to deliver additional emission savings in support of net zero.¹³

Prioritisation

The 2022 assessment of the F gas Regulation formed the basis for policy development between UK, Scottish and Welsh governments to consider options for change.

Three broad objectives were agreed to underpin this work:

- To support delivery of net zero commitments across the UK.
- To ensure continued implementation of our international obligations under the Montreal Protocol.
- To support wider UK, Scottish and Welsh governments' aims by implementing a future system that is flexible to allow for sufficient gas for beneficial uses. This is

⁹ The only emissions savings not attributable to the HFC phasedown are those from regulation of non-HFCs (such as SF6) which are too small to review.

¹⁰ F gas emissions have reduced across the UK by 4.1 MtCO2e per year from 2015 to 2022. <u>Final UK greenhouse gas emissions national statistics: 1990 to 2022</u>, using data from the final greenhouse gas emissions 2022 – Table 1.1.

¹¹ 2022 assessment report (see Section 9 – HFC demand forecast)

¹² See Section 6 of the supporting De Minimis Assessment that accompanies this consultation. More information about the Assessment is set out in the "De Minimis Assessment" section below.

¹³ GB HFC modelling considered a range of phasedown scenarios. The most challenging scenario modelled would reduce quota by 56.7 MtCO2e by 2050.

particularly linked to net zero objectives and ensuring that any changes to F gas policy do not have detrimental consequences on other policies supporting net zero across the UK, for example the heat pump rollout.

These objectives were used to prioritise the policies considered for amendment. Prioritisation using these objectives resulted in some policy areas initially considered for policy development, including those identified in the 2022 assessment report, to be out of scope for this consultation. This included changes to training and certification, reporting and labelling.

We assessed remaining policy options against critical success factors – strategic fit with policy objectives, achievability, affordability and deliverability. Supporting delivery of emissions savings was a key objective and therefore timely implementation (i.e. deliverability) was critical for further prioritisation and short listing. As a result of the longlist options assessment, the HFC phasedown was identified as the most important area for reform.

Policies not in scope of the consultation

The policies discussed in this section are not within the scope of this consultation.

However, it is important to note that other F gas regulatory changes may be considered in the future. The UK Government, in collaboration with the Scottish and Welsh Governments, is committed to further exploring areas for F gas reform considered out of scope of this consultation. As part of broader work to ascertain and if necessary, prioritise, possible further reforms, the three nations are looking to explore options around the future use of other fluorinated gases, which could for example include SF6. This aims to build on the publication set out in the UK Government's <u>Industrial Strategy</u>.

Quota Allocation

Articles 16, 17, and 18 of the F gas Regulation outline the procedures for quota allocation and transfer, with Annex 6 specifying the mechanism. This consultation does not propose changes to Annex 6 or Article 16, 17 or 18 as policy assessments suggest reforming quota allocation would not significantly advance emissions savings at this stage.

MDIs (Metered-Dose Inhalers)

MDIs, such as asthma inhalers, rely on HFCs as propellants to deliver medication. Exemptions under Article 15(2) of the F gas Regulation exclude them from the phasedown and quota requirements. While net zero efforts encourage lower-GWP alternatives, analysis indicates minimal short-term emissions savings from further regulation. This consultation does not propose changes to MDI-related F gas legislation.

Gas Insulated Switchgear - SF6

SF6 is an extremely potent greenhouse gas, with a GWP 22,800 times that of CO₂, representing 4% of UK F gas emissions in 2023. The expected growth of the electricity grid could drive further SF6 use, increasing emissions. However, advances in alternative technologies are reducing reliance on SF6. The <u>Industrial Strategy</u> outlines plans to explore routes to drive forward the phase out of SF6 gas from switchgear in electricity network infrastructure, to help UK manufacturers to capture an emerging market and capitalise on the UK's position at the forefront of developing SF6 switchgear alternatives.

Training and Certification of Technicians

Article 10 of the F gas Regulation establishes the framework for mandatory training and certification for technicians handling F gas-containing equipment. As alternative gases gain traction, industries have called for a similar certification framework, particularly for flammable or toxic refrigerants. While voluntary courses exist, further review may explore training requirements such as within the UK Government's Mandatory Technical Competence Framework. The provisions of the Framework will include measures relating to competence requirements for installers on the handling of flammable refrigerants.

Recovery of F gases

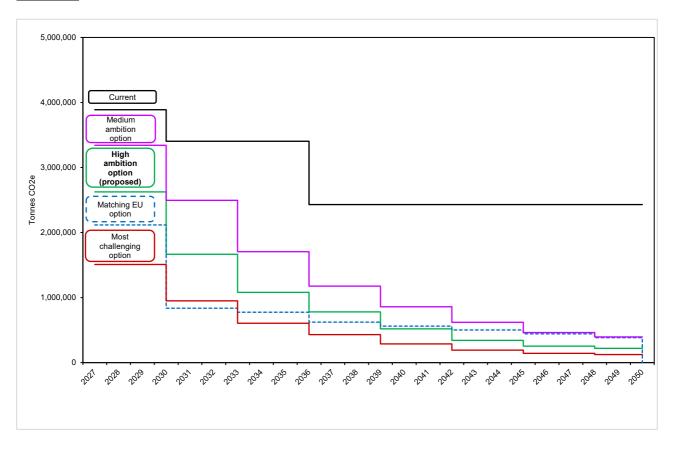
Recovery is a key aspect of F gas management, preventing unnecessary emissions and enabling safe reclamation or disposal. Proper recovery ensures that high-GWP F gases, particularly HFCs, do not contribute unnecessarily to climate change. The UK, Scottish, and Welsh governments recognise the importance of recovery and may consider future measures to enhance recovery practices, supporting net zero commitments.

De Minimis Assessment

A De Minimis Assessment accompanies this consultation. It provides more in-depth context for the proposed phasedown reform and details the outcome of our appraisal of different options. It also contains the assumptions and information on the modelling and analytical work that underpin our proposal.

The proposed reform for GB is one of six short-listed final options for the HFC phasedown initially assessed. Five of these options are displayed in Figure 1: Business As Usual; medium ambition phasedown; the proposed high ambition phasedown; matching the revised EU phasedown (described in the Northern Ireland and EU legislation section); and most challenging phasedown. A non-regulatory approach, the sixth short-listed sub-option, is absent from Figure 1 as it would involve moving away from a HFC phasedown schedule and relying on industry action.

Figure 1



There are notable differences between the GB and EU HFC markets that make matching the EU phasedown in GB sub-optimal. The 2022 assessment report looked at the differences between the markets in the EU and in GB, and why the European Commission 2022 proposal, which was the basis for the 2024 EU F gas Regulation, may be unattainable for GB¹⁴. For example, the EU uses more air conditioning, whereas the market in GB uses (and plans to continue using) proportionally more heat pumps.

Engagement with businesses and organisations in the RACHP sector highlighted concern about safety and energy efficiency of using alternative gases, in certain situations, should the market in GB face a rushed transition that does not account for domestic circumstances. While forgoing emission savings, early phasedown steps that take this into account as part of any reforms would provide GB industry time to transition.

The shortlisted options for the HFC phasedown have been prepared using the GB F gas model, which includes assumptions for HFC demand across uses and sectors. Scrutinising the feasibility of the model input assumptions gives higher confidence that the proposed reform balances climate ambition and industry deliverability. The questions in this

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¹⁴ 2022 assessment report (see page 79).

consultation seek to test the assumptions used to calculate the proposed phasedown and seek views on the proposal itself (or on changes to it).

Proposal for reform of the HFC phasedown

This is a consultation on proposed legislative reform: targeted changes to the HFC phasedown schedule for GB, which is set out in Annex 5 of the F gas Regulation. This reform would further restrict the overall total quantity of HFCs which can be placed on the market in GB. The changes to the HFC phasedown would commence from 1 January 2027.

The proposal in this consultation has been developed through collaborative working between UK, Scottish and Welsh governments. However, as the proposal to change the HFC phasedown for GB relates to a reserved matter, Defra's Secretary of State is consulting on the proposal.

If, following this consultation and subsequent government consideration, we decide to proceed with reforms, those would be legislative reforms.

A targeted approach to proposed reform has been taken, with the aim of implementing changes which will contribute to additional emissions savings as soon as possible.

Proposal for legislative reform of the HFC phasedown

Annex 5 of the F gas Regulation sets out the existing HFC phasedown schedule. The most recent phasedown step started on 1 January 2024, which reduced the quantity of HFCs placed on the market in GB to 31% of the 2015-2019 baseline, or an equivalent 69% reduction in HFCs. Column 2 of Table 1 below shows the phasedown percentages from 2027 onwards under the current F gas Regulation.

We propose changing the HFC phasedown schedule to:

- 1) Adjust the existing percentage phasedown schedule from 1 January 2027; and
- 2) Add further phasedown steps from 2030 until 2050.

The proposed changes and additions to the phasedown schedule are shown in column 3 of Table 1. The proposal will see a phasedown that is quicker and goes further than the current phasedown.

Table 1

Column 1 Years	Column 2 Existing HFC phasedown – F gas Regulation (Annex 5)	Column 3 High ambition phasedown option (proposed)	Column 4 Medium ambition phasedown option	Column 5 Matching EU phasedown option	Column 6 Most challenging phasedown option
2024- 2026	31%	-	-	-	-
2027- 2029	24%	16.2%	20.6%	13.1%	9.3%
2030- 2032	21%	10.3%	15.4%	5.2%	5.9%
2033- 2035	21%	6.7%	10.5%	4.8%	3.7%
2036- 2038	21%	4.8%	7.3%	3.8%	2.7%
2039- 2041	21%	3.2%	5.3%	3.5%	1.8%
2042- 2044	21%	2.1%	3.8%	3.1%	1.2%
2045- 2047	21%	1.6%	2.9%	2.7%	0.9%
2048- 2050	21%	1.4%	2.4%	2.4% NB: 0% in 2050	0.8%

After appraisal of our shortlist of options for reform and considerations of achievability, the high ambition option was chosen to be the proposal to put forward for consultation. The De Minimis Assessment has further details. In developing the proposal, we have attempted to balance various considerations relating to the three broad objectives for policy development outlined above. We consider the proposal to deliver significant emissions

savings in the future, while allowing British industry sufficient time to transition to HFC alternatives. The proposed reform accounts for the unique opportunities and requirements of the market in GB and supports broader government targets, such as catering for the projected demand in HFCs resulting from the heat pump rollout.

Section 4 of the De Minimis Assessment published alongside this document has more detail on how the proposal meets Government objectives and section 6 contains the complete shortlist appraisal. This consultation sets out a specific proposal for changing the HFC phasedown schedule. However, consultation respondents are welcome to reflect views on all options set out in the De Minimis Assessment in their responses, which government will consider in its consultation response.

We are keen to gather evidence and views on the proposal. To ensure we can best incorporate the feedback received to improve and refine our assumptions and modelling, please refer to the supporting De Minimis Assessment and the F gas Technical Assumptions and Data spreadsheet before answering the questions in this consultation.

Questions about the proposal

Confidentiality

Would you like your response to be confidential?

Yes/No

(If you answered Yes to this question, please give your reason(s).)

Classification

Question 1

How would you best describe your industry involvement?

Equipment manufacturer / Gas importer / Installation, maintenance, servicing, recovery business / Trade body / Consultant / NGO / Government organisation / Other [please provide details]

Question 2

If you are a business, how would you identify based on your number of employees?

Micro (1 - 9 employees) / Small (10 - 49 employees) / Medium (50 - 249 employees) / Large (250+ employees) / Not applicable

Proposal

Question 3

Noting the information in this consultation and the shortlist of phasedown options in the De Minimis Assessment, do you agree with our proposed changes to the HFC phasedown schedule?

Yes/ No/ Other

(Please provide further information to support your response, including on whether you prefer an alternative option, and attach supplemental evidence if you wish)

Question 4

A De Minimis Assessment accompanies and is published alongside this consultation document. We use the assumptions and data set out in the Technical Assumptions and Data spreadsheet annexed to the De Minimis Assessment to inform the model on which

we have devised the proposed reform. Are you content with the accuracy of this data? If not, please provide information to better inform our understanding.

Yes / No / Do not know

(Please provide further information to support your response and attach supplemental evidence if you wish)

Question 5

The reform proposal has been informed by assumptions set out in the Technical Assumptions and Data spreadsheet. Do you agree with the assumptions in the Technical Assumptions and Data spreadsheet on leakage rate, recovery, charge size and equipment cost (initial and maintenance)? If not, please provide information to better inform our understanding.

Yes / No / Do not know

(Please provide further information to support your response and attach supplemental evidence if you wish)

Question 6

In developing the reform proposal, we have used the cost methodology as set out in the Technical Annex (Annex 3 of the De Minimis Assessment). To help inform our estimations, are you able to provide any data on the expected cost impacts to your business from the proposed adjustments and extension to the HFC phasedown for GB?

Yes / No / Do not know

(Please provide further information to support your response and attach supplemental evidence if you wish)

Question 7

Considering the reform proposal, are you able to provide any feedback on additional wider impacts to business, such as potential effects on innovation (for example, equipment relying on alternatives to HFCs), competition and trade, skills and training requirements (particularly on alternatives to HFCs), and investment within the sector?

Yes / No / Do not know

(Please provide further information to support your response and attach supplemental evidence if you wish)

Question 8

Can you provide information on the current availability of non-HFC refrigeration, air conditioning and heat pump systems in GB, and whether there are any supply chain or technical constraints affecting their deployment?

Yes / No / Do not know

(Please provide further information to support your response and attach supplemental evidence if you wish)

Question 9

Can you provide an estimate of whether any additional incurred business costs resulting from the proposed reform will be passed on to the consumer (and, if so, how much)?

Yes / No / Do not know

(Please provide further information to support your response and attach supplemental evidence if you wish)

Question 10

If you are a Small and Micro Business (SMB) (qualified as 1-49 employees), are you able to provide any information on impacts, including on additional costs, from the proposed reform to the HFC phasedown?

Yes / No / Do not know

(Please provide further information to support your response and attach supplemental evidence if you wish)

Question 11

If you are a Medium-sized business (50-249 employees), are you able to provide any information on impacts, including on additional costs, from the proposed reform to the HFC phasedown?

Yes / No / Do not know

(Please provide further information to support your response and attach supplemental evidence if you wish)

Question 12

Do you foresee impacts to business from the proposed reform being different between regions across Great Britain and, if so, how?

Yes / No / Do not know

(Please provide further information to support your response and attach supplemental evidence if you wish)