

## Response ID ANON-WTW6-98WS-K

Submitted to F gas Regulation in Great Britain: Reform of the HFC phasedown  
Submitted on 2025-12-16 17:34:58

### Confidentiality

1 Would you like your response to be confidential?(If you answer yes to this question, please give your reason(s).)

No

reasoning behind wanting answers to be confidential:

### Classification

2 How would you best describe your industry involvement?

Other (please provide details)

textbox to specify details of other:

The respondent is The Chartered Institution of Building Services Engineers (CIBSE), CIBSE (the Chartered Institution of Building Services Engineers) is the professional body that exists to advance and promote the art, science and practice of building services engineering, to invest in education and research, and to support our community of built environment professionals in their pursuit of excellence. [www.cibse.org](http://www.cibse.org)

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

Not applicable

### Proposal

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

Other

Text box to provide further information:

CIBSE strongly support the general direction and main objective of the F gas Regulation is to reduce F gas emissions and further recognise that clarity on the HFC phasedown in the UK is urgently needed. Recognising this consultation focuses on specific proposals for HFC phasedown reform, specifically the proposed changing the HFC phasedown in the F gas Regulation by adjusting the existing schedule from 2027 and adding further steps from 2030 until 2050.

CIBSE would highlight risks in the construction and building services supply chain and relatively short time frame to the 2027 initial phase down target. CIBSE is aware of the collective response being made by the Air Conditioning and Refrigeration Industry Board (ACRIB) and detailed response by the Institute of Refrigeration (IoR), which highlight some more detail of the key point from CIBSE members in the air conditioning, refrigeration and heat pump industry.

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5 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 and attach supplemental evidence if you wish)

Do not know

Text box to provide further information on accuracy of data in the De Minimis Assessment:

CIBSE are not in a position to provide qualitative analysis of the data used in the De Minimis Assessment

option to upload file as evidence:

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6 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 further information to support your response and attach supplemental evidence if you wish)

Do not know

Text box to provide further information on agreement with assumptions:

CIBSE are not in a position to provide qualitative conformation in the assumptions within Technical Assumptions and Data spreadsheet and recognise the difficulty in data collection and verification.

agreement with assumptions file upload option:

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

No

data on expected cost impacts to business textbox:

option to upload file as evidence:

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

Yes

Text box to provide further information on wider impacts to business:

The proposed HFC phasedown will rapidly increase the use of A2L, A3 and CO<sub>2</sub> refrigerants. The UK at present lacks revised mandatory training, competence standards and updated qualifications needed to fully support this transition. It is noted that the EU Implementing Regulation (EU) 2024/2215 provides a structured, mandatory training matrix, the UK will have no updated equivalent framework for technicians, designers or installers. The phasedown has risks aligned to certification, a growing skills gap, unsafe or non-compliant installations, and reduced industry capacity and confidence.

The Air Conditioning and Heat Pump industry plays a vital and often overlooked role in the resilience of the UK's construction supply chain and is an essential ingredient to the decarbonisation of heat in buildings. Safe and reliable operation of refrigeration and heat pump systems is essential for decarbonisation of heat and providing essential health and comfort in buildings.

The proposed rapid transition in early years (2027 -2032) of the high ambition pathway to A2L, A3 and CO<sub>2</sub> systems, introduces early risks not only for technicians, supply chain and businesses but for the wider construction and property sectors.

HFOs the revised EU F-gas Regulation (EU 2024/573), broaden the scope of regulated substances to include all "fluorinated greenhouse gases" within the EU. This EU definition means that pure HFO refrigerants (like R-1234yf and R-1234ze), which were previously excluded from the phase-down mechanisms of the previous EU F-gas regulation due to their ultra-low Global Warming Potential (GWP), are now covered by the EU regulation's. Further clarity of UK future policy and direction in regard to HFO would give better UK options on the development and deployment of these systems into UK markets.

CIBSE have had been asked by Transport for London (TfL), which operates circa 4,000 refrigerant-based DX split cooling assets (air-to-air systems) across its sub-surface and deep-level tube network, to highlight potential risks in maintaining critical cooling in this specific area. These installations must comply with DSEAR, and Fire Precautions (Sub-surface Railway Stations) (England) Regulations 2009 (FPSSR). CIBSE highlights the need to incorporate measures to ensure that environmental progress is aligned to the sub-surface safety regulations without compromising public safety or the resilience of critical national infrastructure. This may require some sector exemptions for transition away from HFC.

option to upload file as evidence:

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

Yes

Text box to provide further information:

There is a relatively low maturity in the current availability of non-HFC refrigeration, air conditioning and heat pump systems in the United Kingdom, supplying into the construction and property maintenance industries.

This is compounded by the need for a rapid acceleration deployment of heat pumps in both new build and retrofit where there are likely to be supply chain or technical constraints. Equally building confidence in reliable and cost-effective heat pump technology with end users/consumers is at a low level of maturity.

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

No

Text box to provide further information on an estimate of whether any additional incurred business costs resulting from the proposed reform will be passed on to the consumer:

option to upload file as evidence:

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

No

Text box to provide further information on impacts from proposed reform to the HFC phasedown on small businesses:

option to upload file as evidence:

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

No

Text box to provide further information on impacts to medium-sized business:

option to upload file as evidence to provide further information on impacts to medium-sized business:

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13 Do you foresee impacts to business from the proposed reform being different between regions across Great Britain and, if so, how?(Please provide further information to support your response and attach supplemental evidence if you wish)

Do not know

Text box to provide further information on whether they foresee impacts to business from the proposed reform between regions across GB:

option to upload file as evidence to provide information on Text box to provide further information on whether they foresee impacts to business from the proposed reform between regions across GB:

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