FETA response to F Gas Consultation December 2025

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?

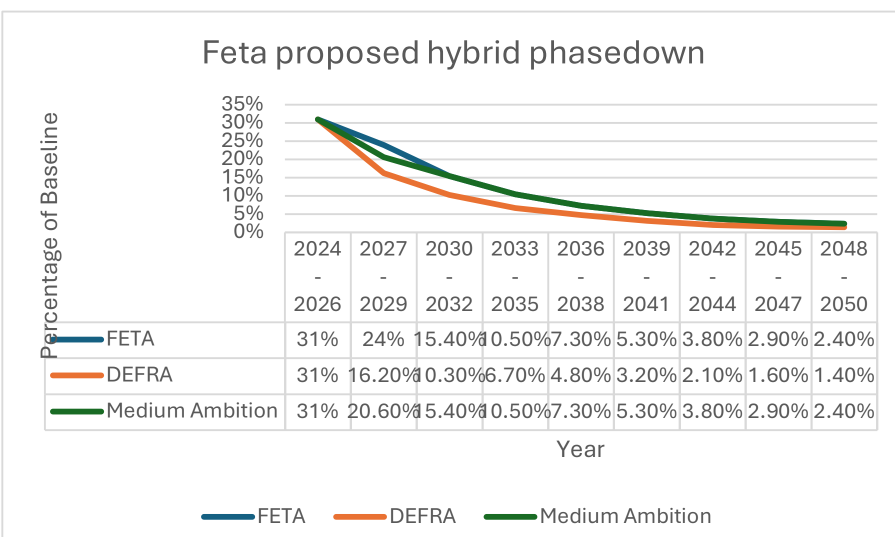
Yes/ ***No***/ Other

Whilst we do not question the ultimate goal of the phasedown, we believe that the cut in quota in the proposal from 1st January 2027 will have severe impacts on the whole RACHP industry, and might possibly have impacts on consumers, and more specifically the roll out of heat pumps to meet the UK's net zero commitments.

Whilst the cut is less than that in the EU regulation, the EU has had two years to prepare for this. The current proposal would give the GB market less than twelve months notice of this major reduction in availability of refrigerants.

We also note that in the De Minimis Assessment, under the short listed options, the only proposal which meets all of the criteria is the Medium Ambition option.

Our preference would be to follow a hybrid option. We believe that industry needs more time to prepare for significant cuts in refrigerant availability. Our proposal is listed below:



	2024 - 2026	2027 - 2029	2030 - 2032	2033 - 2035	2036 - 2038	2039 - 2041	2042 - 2044	2045 - 2047	2048 - 2050
FETA	31%	24%	15.40%	10.50%	7.30%	5.30%	3.80%	2.90%	2.40%
DEFRA	31%	16.20%	10.30%	6.70%	4.80%	3.20%	2.10%	1.60%	1.40%
Medium Ambition	31%	20.60%	15.40%	10.50%	7.30%	5.30%	3.80%	2.90%	2.40%

This would still be a major challenge but could be manageable.

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

Initial comments are concerned about the assumption that GB is currently running at supply of HFCs UNDER the quota level. We do not understand where this information comes from.

The topic of recovered refrigerants needs more detail. Recovered refrigerant splits into two sectors:

Recycled refrigerant is product recovered by a contractor, put through a recovery machine (to remove particles and moisture) and then reused by that contractor. This product is not available to the wider market and can only be used by the original contactor or end user.

Reclaimed refrigerant is recovered and returned to a refrigerant re-processor who will return the product, by chemical process and analysis, to virgin specification. This product can then be traded to the wider market.

We are aware that the EU F Gas regulation relies on significant quantities of recovered refrigerant being available to make up the shortfall between the EU refrigerant demand and their phasedown. If DEFRA are making similar assumptions, our concern is that currently the market is not seeing significant quantities of recovered refrigerant being made available.

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

We are unable to comment directly on the data spreadsheet (as a Trade Association) but it is clear that several of our members have some concerns over some of the data used therein. This includes refrigerant prices, recovery rates, cost assumptions, etc.

We have asked these members to include their detailed concerns in their own submissions to the consultation.

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

We are unable to comment on this question

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

The proposed HFC phasedown will significantly accelerate the adoption of A2L, A3, and CO_2 refrigerants. However, the UK currently lacks a mandatory training and competence framework to support this transition, unlike the EU, which has introduced a structured training matrix under Implementing Regulation (EU) 2024/2215. This gap poses serious risks, including inconsistent certification, fragmented skills provision, and unsafe or non-compliant installations.
Key concerns include the absence of national competence standards, outdated qualifications, and no mandatory training for flammable or high-pressure refrigerants. Without regulatory intervention, awarding bodies may create divergent schemes, reducing industry confidence and increasing safety risks. Designers and installers, not just technicians, require targeted training to ensure compliance with standards such as PE(S)R, hazardous area classification, and high-pressure system design. Failure to address these issues will undermine innovation, investment, and competitiveness relative to the EU, slowing the safe adoption of low-GWP refrigerants. To mitigate these risks, the UK should implement a mandatory training matrix, update qualifications, align awarding bodies, and provide a clear roadmap for competence development. Establishing these measures alongside the phasedown is essential to ensure safety, compliance, and industry readiness.

In addition, the EU has introduced secondary legislation to implement mandatory training an assessment for the handling of all refrigerants therefore enabling the lower GWP refrigerants to be handled safely by operatives. The Government has opted not to consult at this stage on mandatory training and in our view, by not doing so, means that there is a risk that operatives handling lower GWP, more flammable refrigerants is making the industry less safe. Both this and a rapid reduction in the quota could lead to significant market failure.

We would also point out that, with a severe decrease in refrigerant availability under the phasedown as proposed, there is a distinct possibility of illegal imports into GB becoming more attractive commercially. This also brings with it the danger that such illegal imports may be counterfeit as well i.e. the product may not be the product that the purchaser thinks it is. Such counterfeit products may be contaminated with more dangerous constituents posing a safety hazard. Such occurrences have happened in recent years at times of refrigerant shortages. Concerns over this topic have also been raised in the EU by AREA.

Lack of availability of refrigerant will potentially have a severe impact on the service sector, and could lead to inappropriate refrigerants being used to top up existing systems, with possible safety implications.

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

Based on a more severe phasedown, and the need to move to alternatives, some of our members have questioned whether the supply chain for alternative refrigerants is sufficiently robust to cope with a potential rapid increase in demand. For example, at the beginning of the Ukraine War there was a shortage of refrigerant grade CO_2.

We cannot comment directly on availability of other products and components.

In terms of other constraints, the availability of trained and certified technicians to use non-F Gases is a key concern.

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***

The reduced availability of refrigerants under the phasedown could cause prices to rise. In 2017, under the previous F Gas regulation, some refrigerant prices rose tenfold within that year due to the quota and lack of availability. The assumption must be that the supply chain would have to pass any such increases on to the consumer.

As regards other products, we are unable to provide this information.

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***

We would like to raise our concerns about the awareness of this consultation amongst very small companies in this industry. Anecdotal evidence would suggest that many such companies are unaware of potential changes to the F Gas regulation and their possible impacts.

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

Our view would be that there should be no differences across different regions in GB.