



Mr. Philippe Jean
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European Commission
DG Enterprise and Industry
Unit D5 - Automotive Industries
B-1049 Brussels

Brussels, 19th June 2012

Request for clarification on the HFO 1234YF vehicle air-conditioning system refrigerant

Dear Mr. Jean,

We are writing to you regarding the supply shortage of an essential component in mobile air conditioning systems and its impact to the application of Directive 2006/40/EC in the automotive industry.

We would ask you for clarification concerning some of the questions and implications raised by the note that you sent to the members of the Technical Committee on Motor vehicles (TCMV) on 18th April 2012 (ref. ENTR/D5/ASC/kt 0(2012)537265). This note concerned the shortage in supply of the HFO 1234YF vehicle air-conditioning system refrigerant.

Through this note, the European Commission clarified and confirmed the expected dates of implementation caused by the restriction of non-availability of this new refrigerant. This impacts not only on the environment, but also on our association members, who as the manufacturers of the refrigerant servicing equipment need to be prepared to support its introduction (authorised repairers, independent workshops, hire car companies, accident repair shops etc.).

As this new refrigerant has a limited supply and has a much higher price than HFC 134a, there may be few incentives for the vehicle manufacturers to change to the new refrigerant at the earliest opportunity, so clarification of the following points would be most useful in allowing our members to understand what will happen.

Therefore the pertinent questions are:

1. What happens if the deadline of 31 December 2012 for HFO 1234YF availability cannot be met?
2. If a vehicle gets type-approval now and enters production this year, then it could use HFC 134a until 31.12.2012, but for vehicles produced after the 31.12.2012 then HFO1234yf should be installed. How will this be ensured?
3. Will vehicles that were type-approved after 01 January 2011 (prior to the issue of the note to the TCMV's) that should have been using HFO 1234YF, but have been filled with HFC 134a (e.g. Mercedes

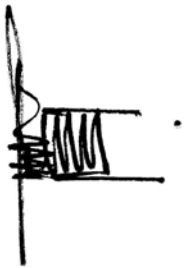
Benz B Class) be converted back to HFO 1234yf as soon as the refrigerant is available either at the next service interval, or other earliest opportunity?

4. What should a vehicle owner do if they have such a vehicle?
5. What should body-shops do with vehicles that have been involved in an accident where the air-conditioning system has been damaged (typical front-end accident) that have been filled with HFO 1234YF if no refrigerant is available to the independent aftermarket (as is currently the case)? Should these body-shops refill the vehicle air-conditioning system with R134a?
6. How will workshops be notified which refrigerant has been installed in a particular vehicle manufacturer's model type if R134a has been replaced with HFO 1234YF when it becomes available?

We would very much appreciate if you could help us in clarifying these important points to allow our members to have clarity concerning the introduction of HFO 1234YF refrigerant.

We thank you very much in advance for your kind consideration.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Neil Pattemore', with a small dot at the end of the signature.

Neil Pattemore
EGEA Technical Advisor