



## **Transfrigoroute International**

The Inter-Professional Organisation Serving Temperature-Controlled Transport and Logistics

# **TI Reaction to the leaked Commission proposal of weights and dimensions**

Transfrigoroute International (TI), the specialist independent umbrella association for the temperature-controlled road transport, fully encourages the overall goal of the European Commission to reduce greenhouse gas emissions by 60% until 2050, as laid out in its Transport White Paper. Temperature-controlled road transport requires safe, non-toxic and efficient refrigerants to operate, which is why f-gases (fluorinated gases) have been the predominant refrigerant used by our sector.

Thus, TI welcomes the inclusion of road transport – cooling equipment on board trucks, trailers and vans – in the scope of the F-Gas regulation. This is something which TI explicitly asked for in the earlier Commission stakeholder consultation. In particular, we want to ensure the safe handling of F-gases, or any other refrigerant, by professionals that are trained and certified to do so.

TI would like to bring your attention to the following points, which need to be considered in the F-gas regulation review as being pertinent to our industry. We emphasize that any requirements being considered for stationary equipment using f-gases do not necessarily have the same consequence as the road transport sector and care needs to be taken to assess the differences.

### **Lack of drop-in solutions as of 2018**

Currently, the temperature controlled road transport industry has not yet developed a simple “drop-in” solution for f-gases. It cannot be predicted with certainty whether such a solution will be ready by 2018.

Indeed, it is very difficult to find a refrigerant which can handle the range ambient operating temperatures from +45°C to -40°C, while controlling temperatures of transported goods in a range from 15°C to -30°C.

As such, alternatives may be:

- Less energy efficient, which is in contrast to the objectives of reducing GHG emissions;
- flammable, which may pose major safety threats to the public and / or
- will require a significant redesign of new equipment and replacement of existing products, which will come at a substantial economic cost.

### **Problems regarding servicing**

Furthermore, any considered ban of the use of existing equipment using refrigerants with a GWP greater than 2150, which essentially means R404A, would lead to major problems in servicing and supporting existing vehicles after 2018.

Indeed, our cooling equipment typically lasts approximately 6 years (vans) and 9 to 12 years (trucks & trailers). As R404A is used in roughly 90-95% of units across the three main sectors in road refrigeration (vans, lorries, and trucks & trailers), this can lead to maintenance problems for our transporters.



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### **Pre-charged equipment bans**

TI is opposed to moves to ban pre-charged equipment because it could result in an increase of emissions and a reduction in safety, energy efficiency and performance of cooling equipment. There are significant productivity and safety advantages to shipping systems pre-charged as they are charged in a controlled process environment, thoroughly leak-tested. Pre-charging is required in order for our cooling equipment products to be tested in accordance with the industry's ATP protocol, an international protocol. A ban of pre-charged equipment would force us, prior to shipping, to remove the charge required for testing, add some holding charge like nitrogen, and then doing the whole process in reverse at the installation site. This makes no sense if it can be avoided.

### **Financial impact on fleets and hauliers**

Indeed, the potential impact of the ban on the use of refrigerants with a GWP over 2150 from 2018 in servicing and of the prohibition of the maintenance of refrigeration equipment in transport refrigeration applications will impact very negatively on existing and future equipment used in road transport refrigeration (van, trucks and trailers) for our transporters and hauliers.

The proposed measure will stifle investment in much needed energy efficient replacement vehicles. Furthermore, the value of existing fleets would be dramatically reduced, which in itself can have some rather drastic consequences for our Member companies.

### **Scope: Include vans because of leakage rates**

Vans, with refrigerants charges with an equivalent global warming potential above 5 tonnes CO<sub>2</sub>, should also be covered by containment provisions, as vans represent about 70% of the direct drive segment (around 30,000 vehicles a year) and these units experience the highest leak rate.



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### ANNEX

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#### About Transfrigoroute International

Founded in 1955 as a non-profit association, TI is the specialist independent umbrella association for the temperature-controlled road transport sector. TI comprises 18 national member associations in Europe and North Africa and unites some 1,500 members involved in temperature-controlled logistics and the transportation of foodstuffs by road tanker vehicles. TI is open to both haulage companies which transport foodstuffs or perishable goods using insulated/refrigerated vehicles, as well as manufacturers of commercial vehicles, trailers, vehicle bodies, refrigerating equipment, and accessories, as well as technical testing organizations.

The social responsibility borne by the temperature controlled transport industry by far exceeds the proportion of the total EU fleet size, estimated to be approximately 10% compared to other transport activities. **Our sector plays a vital role in ensuring the continuation of the cold chain for perishable foodstuffs by assuming the legal obligations under the General Food Law for the public health and safety of all 500 million EU consumers.**