

(English version)

**Question for written answer E-002966/26
to the Commission
Wouter Beke (PPE)
(15 July 2026)**

Subject: Application of the life cycle CO₂ emissions exemption under Article 11(2) of Regulation (EU) 2024/573

Heat pumps are widely recognised as a key technology for achieving the EU's energy security and decarbonisation objectives. Regulation (EU) 2024/573 (F-gas Regulation) introduces market prohibitions on certain refrigerants in heat pump equipment from 2027 onwards. However, alternative refrigerants are not yet available for all applications. The regulation therefore provides exemptions to ensure a balanced and realistic transition.

Article 11(2) states that certain placing-on-the-market prohibitions do not apply where the life cycle CO₂ equivalent emissions of the equipment are lower than those of equivalent equipment meeting the relevant ecodesign requirements.

However, the Commission has not yet clarified the methodology to calculate these life cycle emissions, and the current ecodesign regulations do not provide a clear reference. Without such clarity, manufacturers cannot apply the exemption consistently or with sufficient legal certainty, while market surveillance authorities may face difficulties in verification and enforcement.

Can the Commission clarify what concrete steps are being taken to develop and integrate an appropriate life cycle CO₂ emissions calculation methodology into the relevant ecodesign regulations before the market prohibition comes into force, so that the article 11(2) exemption can be applied and verified consistently across the EU, taking into account the provisions of Recital 23 of the F-gas Regulation?

Submitted: 15.7.2026

**Answer given by Mr Hoekstra on behalf of the European Commission
(1 September 2026)**

The Commission agrees that heat pumps are a key technology to achieve the EU's electrification, decarbonisation and energy security objectives.

Article 11(2) of the F-gas Regulation ⁽¹⁾ is meant to ensure that there are no trade-offs between efforts to reduce the direct (F-gas Regulation) and indirect (Eco-design for Sustainable Products Regulation (ESPR)) ⁽²⁾ emissions of equipment using fluorinated gases such as heat pumps. It requires that a clear methodology is set under ESPR rules.

ESPR rules are developed at the product level, e.g. for space heaters or air conditioners and comfort fans, and regularly updated. During that process of updating, extensive technical work is undertaken.

If it becomes evident during that process that the rules of the F-gas Regulation would force a move towards refrigerants that would result in lower efficiency, an appropriate life cycle CO₂ methodology could be included to avoid such outcomes.

While Article 11(2) has been part of the F-gas Regulation since 2015 (it is identical in the previous Regulation (EU) No 517/2014) ⁽³⁾, no such cases have yet been identified.

⁽¹⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02024R0573-20240220>.

⁽²⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02024R1781-20240628>.

⁽³⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX%3A32014R0517>.