



F-Gas Quota Consultation Update

Impact of reductions in refrigerant and estimate timeline for implementation by Government

Introduction

Following the 6 week consultation by DEFRA in Q4 last year, at the time of writing, Government has not published its response despite indications that this would likely be in Q1 2026.

DEFRA have only consulted on a proposed change to the **phasedown**. All other aspects of the current GB F Gas regulation would remain in force.

Under the existing GB F-Gas regulation, there is a reduction in the quota value of 7% in January 2027 from 31% to 24%. This represents a 22.6% drop in refrigerant availability.

FETA intends to detail what the various quota reduction scenarios could look like ahead of the consultation response based upon the scenarios in the consultation and the FETA Hybrid proposal.

We are currently engaging with the Government to push for the publication of its response to the consultation and what the next steps will be in terms of legislation.

What the reductions in refrigerant equate to

There are 4 aspects to this table covering the reduction in refrigerant availability (aka quota).

1. The existing F-Gas regulation which already has a reduction in quota for 2027.
2. FETA hybrid proposal as per our consultation response.
3. DEFRA High Ambition option – the preferred option in the DEFRA consultation
4. DEFRA Medium Ambition option

The table shows the **reduction in refrigerant availability** on the previous period. In other words, under the existing F-Gas Regulation, the amount of refrigerant available in 2027 will be 22.6% less than in 2026.

Period	Existing GB F gas Regulation (Annex 5)	FETA Hybrid Proposal	High ambition phasedown option (DEFRA proposal)	Medium ambition phasedown option
2027-2029	-22.6%	-22.6%	-47.7%	-33.6%
2030-2032	-12.5%	-35.8%	-36.4%	-25.2%
2033-2035	-0%	-31.8%	-35.0%	-31.8%



Legislation process

Statutory Instruments (SI) are the most frequently used type of secondary legislation.

DEFRA previously said they would follow a Negative SI route (rather than Affirmative). Around 80% of SI's are Negative so it is not surprising that DEFRA indicated this route – it is even harder to get changes made to Negative SI's than Affirmative ones (Affirmative SIs go to a Delegated Legislation Committee made of 16-18 MPs, but Negative ones do not)

[This PDF flowchart shows the process for Negative Procedure Statutory Instruments](#) – it suggests it is possible to get SI's revoked which is in theory but not in practice (The House of Commons last did this in 1979 and the House of Lords in 2000). The Joint Committee on Statutory Instruments (JCSI) checks SIs but their changes are procedure based (flawed wording/lack of clarity etc) rather than policy based (so we won't be able to change the phase down numbers once they are included in Secondary Legislation). Hence why FETA started its political engagement programme early in December 2025.

In terms of timing:

- The government must publish their consultation response at least 12 weeks after the consultation has closed. Generally, the more complex the response the longer it takes them. Their consultation response will outline next steps – which presumably will be the plan for secondary legislation.
- The general lead in time for an average SI to be drafted, made, laid before Parliament and to come into force is about 10-12 weeks. This would be after the consultation response.

For the F-Gas consultation, publishing at the end of March means that the Government would need to have an SI in place before the end of June 2026. Later than this and there is a risk it goes into the Autumn and then likely to be signed by a Minister in a two-week window in September. If this is missed, then it would probably be after the Conference season with potentially significant issues for Industry.