

██████████ (SPF Santé Publique - FOD Volksgezondheid)

From: ██████████ (SPF Santé Publique - FOD Volksgezondheid)
Sent: mercredi, 12 juillet 2023 11:28
To: ██████████@envcoord.health.fgov.be
Subject: FW: TODAY'S COREPER meeting: Support for ambitious F-Gas Regulation

FYI

From:
Sent: mercredi, 12 juillet 2023 11:12
To: ██████████ (SPF Santé Publique - FOD Volksgezondheid) <██████████>; Fluor Gas Federal Belgian Authority (SPF Santé Publique - FOD Volksgezondheid) <██████████@health.fgov.be>
Cc: ██████████ net>
Subject: TODAY'S COREPER meeting: Support for ambitious F-Gas Regulation

Dear ██████████,

I am from the German environmental organization Deutsche Umwelthilfe e.V. and together with my German NGO colleagues, I am writing to you regarding today's COREPER meeting on the F-Gases Regulation – a last ambitious push is needed!

First and foremost, **completing this file in the next trilogue (19.07.23) is of utmost importance**, given the heavy workload of the Spanish Presidency and the need for this file to come into effect for the start of 2024. This is the **last chance to raise ambition** in order to reach climate goals, protect public health and support European industry. In contrast to many other difficult compromise findings, the **F-gas file has so much potential** because F-gas alternatives already exist in the market and there is no need to trade public health and climate protection for the prolonged use of F-gases!

Also considering the environmental pollution with PFAS chemicals, F-gases play a special role: on the one hand, **F-gases have the highest emission contribution to PFAS pollution**, but on the other hand, F-gases are also the **easiest to substitute with natural alternatives**, therefore **constituting a unique scope of action**. It is **key to determine a concrete F-gas phase out and product bans** – because without, the chemical industry will continue to develop new chemical substitutes that are potentially harmful to nature and health.

Therefore, I would like to stress the following key points, necessary for a successful F-gas regulation:

HFC Phase down/out

- An HFC phase out sends a clear global signal ensuring the EU remains a leader on F-gas ambition and affords leverage for faster action under the Montreal Protocol, ensuring the FGR is futureproof.
- An HFC phase out aligns with EU climate objectives to be climate neutral by 2050.
- A full-scale and prompt transition to climate-friendly solutions is needed to avoid an unmanageable burden on future generations to contain HFC leakage during use and recover HFCs at end of life.
- ██████████ transition away from F-gases removes EU dependency on imported F-gases and fluorspar from ex. China.

Annex IV Bans

General:

- Need for ambitious dates
 - Clear market signals unlock investment in EU production and lower hardware costs.
 - There is an abundance of technical evidence supporting bans.
- Justification for banning All Fluorinated Gases

- Precedent as approach previously taken by Commission, *e.g.* ban 21.
- Includes HFOs, which otherwise sit outside HFC phase-down and patented by US multinationals.
- Aligns with potential upcoming PFAS restrictions under REACH.
- Avoids locking in environmentally damaging HFC blends below GWP 150, which risks ever-growing servicing and maintenance costs and stranded assets.

Specific bans:

- Ban 14
 - F-gas free alternatives exist already on the market
- Ban 17
 - Proposed ban date for 150 GWP varies between 2025-2027. Many manufacturers offer systems that meet this GWP threshold to the market already and there is no need to delay this ban.
 - F-gas ban dates are necessary, even if they are later. This will allow industry time to move away from environmentally harmful chemicals. The market has already shifted significantly to non-HFC alternatives for self-contained AC and heat pumps, monoblocs included. A full F-gas ban therefore prevents backsliding and unnecessary use.
- Ban 18
 - Ban date for 150 GWP of 2027 in single split systems of <12 kW is viable as the technology already exists. The ban should apply to both air-air and air-water systems. A new product standard is opening the door for air-air split systems and a market signal is needed to unlock innovation. There is no need to change kW cut off down to 6kW as proposed by industry. The new standard for residential air conditioning will allow for safe and energy efficient use of R290 in systems up to 12 kW. A recent study found that 12kW systems using R290 can achieve Seasonal Energy Efficiency Ratios (SEERs) of 12.
 - A total F-gas ban date is necessary and viable as the market is shifting towards non-HFC alternatives for AC and heat pumps for 12 kW and below and above 200 kW. This ban would prevent backsliding and unnecessary use of PFAS.
 - Need for 150 GWP limit for >12kW as well. Manufacturers are already innovating, for example Panasonic has recently launched a range of F-gas free heat pumps from 50-80 kW
- Ban 23 / Article 13: switchgear
 - Total F-gas ban instead of GWP limits (even GWP 10) is needed because GWP limits promote establishment and development of PFAS substitutes and SF6 mixtures
 - Especially on Medium Voltage level - F-gas free solutions are widely available from several manufacturers.
 - At High Voltage level: F-gas free solutions are available within the set timelines according to manufacturers.
- New bans
 - Ensure all sectors where alternatives are available are progressing away from F-gases
 - Free up quota for harder to move sectors
 - Technologically feasible
 - Mobile AC
 - For all sectors, alternatives are available but a market signal is required to unlock investment in production.
 - Mobile refrigeration
 - Transport refrigeration units typically have high leakage rates, short lifetimes and poor end of life refrigerant recovery making this a key subsector for urgent action to address fluorinated gas emissions. Leakage rates for refrigerated road transport can be as high as 165% of original charge over a 10-year period. The 2021 Preparatory Study states the lifetime emission rates of transport refrigeration systems are the highest of all non-emissive sectors behind ship air conditioning at 25% for vans, 18% for trucks and trailers and 30% for fishing vessels. Low-GWP alternatives exist already on the market but uptake has been slow necessitating an Annex IV ban to motivate the market to shift.
 - Foams
 - Foams have a product lifetime of 50 years and the recovery of F-gases within is expensive. Alternatives relying on H₂O and CO₂ are already available for XPS and PU Spray foams. One component Foam (OCF) is currently only using HFC-1234ze but that sector should be encouraged to find an alternative to F-gases. To the extent there are any concerns about the

- feasibility of a transition in the OCF sector, Article 11(4) provides a sufficient safeguard provision that allows for time-bound exemptions when alternatives are unavailable.
- Ensures retrofit of buildings under the Energy Efficiency Directive uses HFC-free foams
 - Technical aerosols
 - Broad consensus on technical feasibility of alternatives
 - Proven cost-effectiveness with further cost reductions expected through economies of scale
 - Chillers
 - On mini chillers, they require very little refrigerant charge and can rely on propane. A clear market signal avoids the market penetration and use of mid-GWP HFCs, HFOs and HFC blends.
 - On displacement and centrifugal chillers, displacement (both small and large) and centrifugal chillers currently have multiple natural refrigerant alternatives that are expected to dominate the market going forward. The use of F-gases in these sectors unnecessarily consumes HFC quotas and contributes to illegal HFC trade.

For the sake of the integrity of our climate, environment and health, I urge you to support the ambitious F-gas phase-out and product bans!

Please reach out if you have any questions or seek further support, argumentation or sources.

Best wishes from a sunny Berlin,

| Programme Manager Fluorinated Greenhouse Gases

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