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To:

Subject:

FW: The revision of the FGAS is not undermining REPower EU, quite the opposite - remarks from the EEB

USAGE INTERNE - INTERN GEBRUIK

FYI

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Sent: Friday, 9 December 2022 15:03

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Subject: The revision of the FGAS is not undermining REPower EU, quite the opposite - remarks from the EEB

Sir, Madam

Conscious of the ongoing debate on the revision of the F-gas regulation in the Council, we take the liberty to writing to you about the links between this regulation and the REPower EU.

The EEB has always been supportive of promoting a much higher share of renewable, distributed energy that can free our homes from the dependence on fossil fuels and alleviate the burden of fossil fuels on the member states' financial statements: for this reason, we favour the provisions of 30 million heat pumps installed by 2030 that the European Commission has enshrined in the REPower EU package.

But we also believe that the F-gas regulation revision is a once-in-a-lifetime chance to reduce drastically EU's climate impact with one, swift move that works on low-cost solutions, remarkably natural refrigerants.

Contrary to what others have stated, **we hold that an ambitious revision of the F-gas regulations is the best chance that EU has to achieve the Heat Pumps target of the REPower EU** and hence to strongly reduce our economic ties with Russian gas.

We firmly believe so, based on the following arguments:

1. **Most HPs will be installed in light renovations:** currently [only 0.2% of the renovations](#) in EU are deep renovation. The EEB believes that we need to move to a 3% yearly renovation rate but even in that case we will need more than 30 years to fully renovate the building stock. This means that most of REPower EU's 30million heat pumps by 2030 will either be installed in light renovations or will be substituting end-of-life fossil boilers in poorly insulated buildings.
2. **Natural refrigerants can deliver much higher number of HPs:** those heat pumps that will be installed in buildings that are not yet insulated will need to work efficiently both at mid and high- temperature. This will be possible with natural refrigerants heat pumps. The fact that these heat pumps can be sold both to renovated and non-renovated buildings will **extend the market for heat pumps** and concretely increase the chances to reach REPower EU targets.
3. **Natural refrigerant will help freeing our heating & cooling from dependence:** unlike all fluorinated refrigerants (old and new) natural gases are largely produced in Europe. F-gases rely on the Fluorspar, classified by JRC as Critical Raw material in 2020, whose production is concentrated in China (57%), Mexico (17% and Mongolia (10%). Hydrocarbon refrigerants actually produced in EU can cover all market demand and, as a by-product, they represent an infinitesimal share of oil & gas production ([see here](#) at pg. 29).
4. **Natural refrigerant HP can work at different temp then allowing staged renovations:** Natural refrigerants can reach as high as 80°C still complying with the ecodesign regulations on energy efficiency. This means that they may be able to replace combustion-based technologies more easily than has been previously assumed. This is not to say that fabric energy efficiency retrofits are not needed, but it does imply that the depth and number of retrofits needed to install 30M HPs can be lower.

5. **High temp heat pumps can work for staged renovations:** This means also that if fabric efficiency measures are only added a heat pump is installed, the modern heat pump is [less likely to suffer from poor performance](#) even when slightly oversized. Indeed, they can also work well on mid-range temperatures, leaving open the possibility of substituting fossil boilers ahead of full renovation – for whatever reason- and hence allow for staged renovation.
6. **Give clear signal to the market now:** [Industry is investing now](#) to transform the existing production plants, expand them and create new ones. Should these plants be based on HFOs or climate harming refrigerants we would risk either that they might become a stranded asset in a matter of few years (if the REACH assesses these refrigerants as harmful) or require quotas that should be used for the maintenance of the old heat pumps and refrigerators, thus competing for them, and contributing to rising their price. The fgas revision must send a clear message to industry and give visibility on the market ahead.
7. **HPs with high temperature are already delivering on all heating segments:** it is worth sharing a few stories on what high temperature heat pumps are already doing. There is a growing share of installations of these HPs in block of flats with centralised heating or office buildings ([see here](#) for instance), as well as in district heating (for instance, [here](#)).
8. **Hydrocarbons are not particularly more dangerous than other alternatives:** while safety must always be a concern, the argument that the natural refrigerants' heat pumps would pose a threat to people's life is simply not true. As [this interview](#) with one of the most reputed scientists in this field clearly points out, we are in any case much better off compared to a previous situation where we had a flammable gas (methane) running through the pipes of our homes and ending up in an appliance with an open flame (the boiler). If we managed to safely heat our homes and offices with such a dangerous technology, we will obviously manage to do the same with a much less dangerous one

For these reasons, we call **on the full support of the phase out of f-gases (including HFOs, which are or can give way to PFAS chemicals) for the heat pumps sector too**, thus taking EU one step closer to achieve the Paris agreement's climate goals and freeing our economy from dangerous dependencies.

We remain at your disposal for any further discussion on this topic.

Best Regards

Deputy Policy Manager for Climate

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