

From: [REDACTED] (CLIMA)
Sent: mercredi 7 avril 2021 10:02
To: [REDACTED] (CLIMA)
Subject: FW: EPEE's concerns about including F-Gases under a REACH restriction proposal on PFAS
Attachments: EPEE - PFAS regulation under the EU F-Gas Regulation 31 March 2021 - FINAL.pdf

From: [REDACTED] <[\[REDACTED\]@epeeglobal.org](mailto:[REDACTED]@epeeglobal.org)>
Sent: Thursday, April 1, 2021 12:32 PM
To: [REDACTED] (CLIMA) [REDACTED]
Cc: [REDACTED] <[\[REDACTED\]@epeeglobal.org](mailto:[REDACTED]@epeeglobal.org)>; [REDACTED] <[\[REDACTED\]@epeeglobal.org](mailto:[REDACTED]@epeeglobal.org)>
Subject: EPEE's concerns about including F-Gases under a REACH restriction proposal on PFAS

Dear [REDACTED]

I hope all is well and you are getting ready for Easter – unfortunately it seems the nice sun we are having right now will not last ...

I would like to share with you our latest position paper, summarising our strong concerns on the proposal made by 5 Member States to include F-Gases in a REACH restriction on PFAS. As you know we strongly support the F-Gas Regulation (and Kigali Amendment on a global level) which we believe is the best and most suitable instrument to regulate F-Gases. In addition, the review certainly offers opportunities to further optimise it, for example by extending the recovery, recycling and reclamation (RRR) requirements to all refrigerants, including HFOs and non-fluorinated gases in order to mitigate emissions throughout the lifecycle.

We would also like to note that a REACH restriction of F-Gases could slow down substantially the decarbonisation of multiple sectors, heating (which still relies with over 75% on fossil fuels) being one of them.

All refrigerants, including HFOs and lower GWP HFCs, are essential for the safe, energy efficient operation of heat pumps which need to be broadly deployed to achieve the 2030 targets and climate neutrality by 2050.

We are currently in process of finalising new modelling with the support of Gluckman Consulting and UNEP which – among others – will help visualise the important contribution of heat pumps to meet these targets.

We would very much appreciate to further exchange with you on this matter, perhaps with an informal brainstorm on next steps?

I look forward to hearing from you,

Kind regards and happy Easter,

[REDACTED]

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