

22 September 2023

**SUBJECT: Request for an exception to a ban of PFAS in the areas of heating, air conditioning and refrigeration.**

Why are exceptions for the area of refrigeration and air conditioning technology essential for society as a whole and why are no suitable alternatives available?

- The retail trade would be affected by a ban of PFAS in the areas of heating, air conditioning and refrigeration technology.

PFAS are used in different forms in the areas mentioned:

- as a component of refrigerants, especially in those alternatives that are a replacement for the refrigerants that will be prohibited due to the revision of the F-Gases Regulation.
- as materials in technical hydraulic components with special properties. These include compressors, pumps, valves and cylinders. PFAS are used here in seals, hoses, lines, valves as well as in coatings. A substitution of PFAS in these components is usually not possible. Either there are no alternatives or the performance of these components cannot be achieved to the extent required to guarantee the functionality of these components. Due to the complete ban, neither the production of these components within the economic area nor their import from outside would be possible.

- A ban on PFAS in these areas would have the following consequences for the food trade:

o Any refrigeration technology that is used for the safe storage and offering of food that requires refrigeration would no longer be permitted after the transition periods have expired. This would mean that it would no longer be possible to supply the population with goods that require refrigeration while complying with the hygienic standards set today.

o A large proportion of the climate-relevant emissions in the food trade result from refrigeration technology. In this respect, switching to more climate-friendly refrigerants offers the food trade a great deal of leverage to minimize greenhouse gas emissions and thus contribute to the climate goals in Europe. However, due to a lack of climate-friendly alternatives, a general ban on PFAS would prevent such a switch. Switching before the ban becomes effective is hindered by the limited personnel capacities at refrigeration companies and industry.

o In addition, the proportion of food waste would also increase dramatically, as cooling contributes to a longer shelf-life for fresh and sensitive products. Important food waste reduction objectives of the EU would therefore unlikely be realised.

o Please note that this does not exclusively affect the production and trade of food. Medical products (including vaccines), many of which require refrigerated storage, would also be affected by a PFAS ban.



Are you advocating exemptions for the entire refrigeration and air conditioning technology sector? If so, how long should the exceptions last?

- Due to the system-relevant importance of refrigeration technology - among other things for supplying the population - exceptions should apply to the entire area of refrigeration and air conditioning technology.
- In order to avoid a standstill, the exception regulation should be coupled with regular evaluations. The goal of the evaluation should be to determine the availability of practical – and affordable – alternatives to PFAS for the areas described here. As soon as these alternatives are widely and sufficiently available, the exceptions to the ban could be lifted.

A first evaluation stage could be drawn up for 2030, for example. This option and the corresponding time periods should be coordinated with other relevant EU associations in order to be able to resolve the balancing act between unachievability and lack of ambition in a well-founded manner.

