

F Santé Publique - FOD Volksgezondheid)

From:

Sent: mercredi, 12 juillet 2023 11:25

To:

Santé Publique - FOD Volksgezondheid)

Cc:

Subject: The ban on PFAS in the fgas regulation is a milestone in preventing a massive threat to both health and environment. And it's doable.

Attachments: Fluorspar-IMFORMED-Mineral-Minutev4.pdf; EEB_EU FGR.pdf

Dear M

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My name is Elena Fazio and I am writing to you on behalf of the EEB the European Environmental Bureau (EEB), Europe's largest network of environmental citizens' organisations, representing over 30 million citizens.

Yesterday [we commented on the results](#) of the largest ever chemical screening in the history of the EU, **European Human Biomonitoring Initiative (HBM4EU)** which produced 168 peer reviewed [papers](#) that [found](#):

"widespread exposure to PFASs which exceeds health-based guidance values", this is, at levels beyond which health impacts cannot be ruled out. All young people tested were found polluted, with around a quarter in one study beyond the level of health concern. A growing number of 'PFASs hotspots' were identified, where exposure is around 100 times more than average and "a risk to human health".

Today, in the F-gas regulation framework **you have the chance to stop this.**

Refrigerants are the N.1 source of PFAS in our society and the ban on fluorinated refrigerants in all possible applications, as proposed by the Parliament, is the one, concrete, step to take to prevent **a widespread pollution that cannot be reverted**. Unlike other polluters, gases by nature are ubiquitarians and will result in a widespread contamination of surface and underground waters. That's it: **once they are out there, they are there forever**. And they end up in our bodies.

For this reason, we should avoid to use HFOs and HFCs when natural alternatives are there. And they are.

We cannot trade our health for economic interests which are, at best, to be proven. Among other consideration, it should be noted that the EU is fully self sufficient for the production of natural refrigerants while HFOs are produced with mostly Chinese and other non-EU raw materials, with US patents and are a huge burden in terms of imports for EU member states.

In particular, regarding the bans we remark that

- Ban 14
 - F-gas free alternatives exist already on the market
- Ban 17
 - 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.**
 - 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**.

- 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

Again, for the sake of preventing a very serious risk of pollution we also support the other additional bans from the Parliament, such as those on chillers and mobile refrigeration.

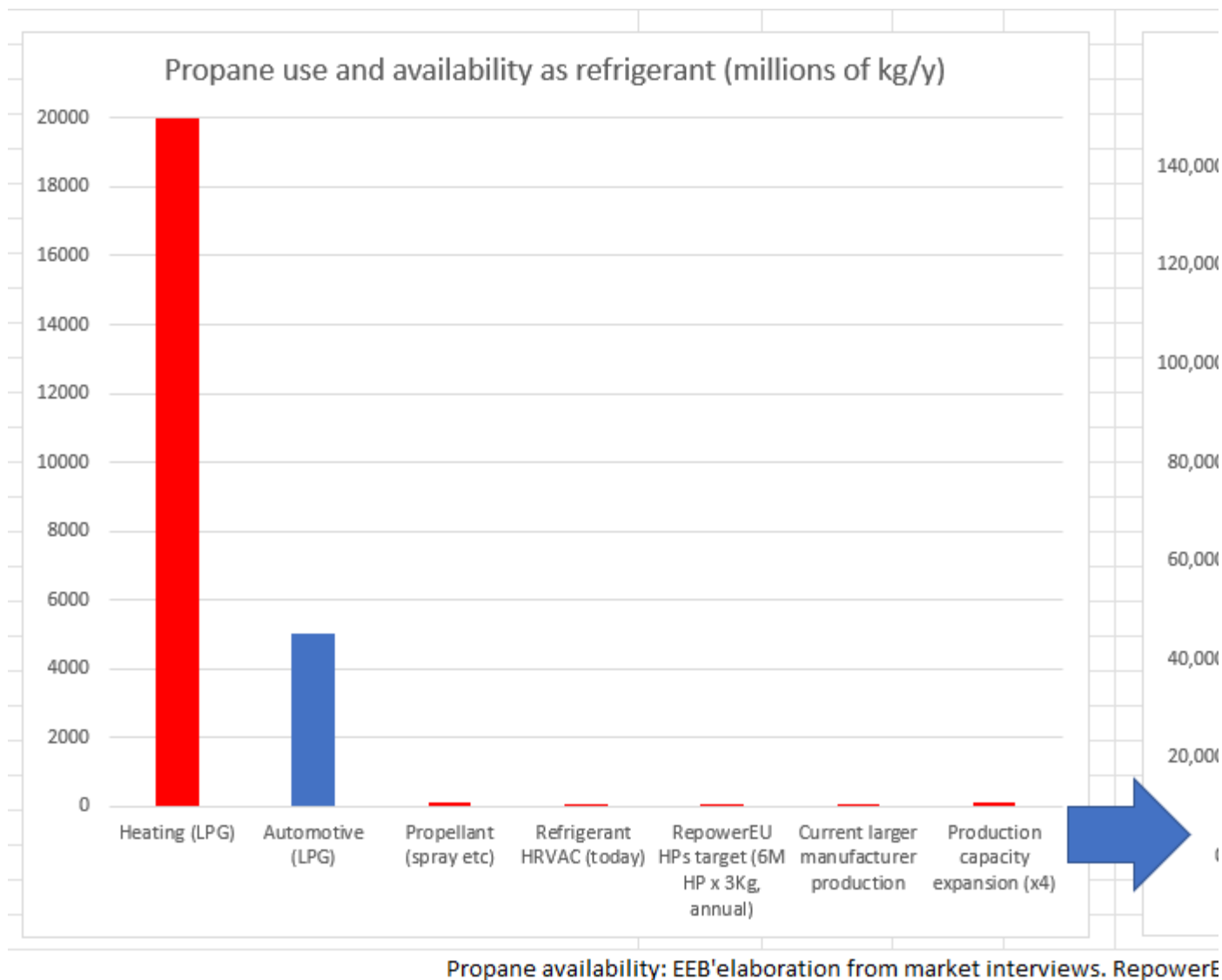
In a nutshell: It might cost a bit more. It might take slightly more. But it is worth doing and it's a no-regret direction.

Thanks for your attention

ANNEX XV RESTRICTION REPORT – Per- and polyfluoroalkyl substances (PFASs)

Table 4. Tonnes and emissions of major use sectors and manufacture for 2020 (sorted by tonnage range)

Application	Tonnage range	Emission range % emitted in manufacturing and use phase	Emission contribution Contribution to total emission
Applications of fluorinated gases	5	2	5
TULAC	5	2	4
Medical devices	5	2	3
Manufacture	5	1	2
Food contact materials and packaging	5	1	1
Transport	5	1	1
Construction products	4	3	2
Electronics and semiconductors	4	2	1
Lubricants	4	2	1
Petroleum and mining	4	1	1
Energy sector	4	1	1
Metal plating and manufacture of metal products	3	1	1
Cosmetics	2	5	1
Consumer mixtures	2	4	1
Ski wax	1	3	1
Table legend			
Tonnage range (t/y)		Emission range (%)	
1	0 – 10	1	0 – 5
2	10 – 100	2	5 – 25
3	100 – 1 000	3	25 – 75
4	1 000 – 10 000	4	75 – 95
5	>10 000	5	>95



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The European Environmental Bureau (EEB) is Europe's largest network of environmental citizens' organisations, standing for environmental justice, sustainable development and participatory democracy.

EC register for interest representatives: Identification number 06798511314-27

International non-profit association - Association internationale sans but lucratif (AISBL)

BCE identification number: 0415.814.848

RPM Tribunal de l'entreprise francophone de Bruxelles

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