

Von: "[REDACTED]" <[REDACTED]@jci.com>
Datum: Dienstag, 12. September 2023 um 10:54:35
An: "WEIDENBACH Anne Katherina (CAB-SIMSON)" <[REDACTED]@ec.europa.eu>
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Betreff: input on F-Gas regulation

Dear Ms. Weidenbach,

Also on behalf of [REDACTED], many thanks again for a very productive discussion with you on the F-Gas regulation earlier this summer. As negotiations are now in the final round of the trilogues we understand the discussions revolve around the incorrect assumption that F-gas refrigerants are simple to replace. We therefore share with you the attached overview on the sectoral investment in the European fabric which would be affected by the ban. We also enclose our broad industry view that underlines our point that a full F-gas ban (HFCs and ultra-low GWP HFOs) as proposed by the European Parliament is totally contradictory to the Commission's original proposal.

Such a full F-gas ban will result in an ineffective policy – essentially shooting ourselves in the foot as we strive for lower emissions and energy independence. We must embrace an energy efficiency and safety-first principle, increasing Ecodesign requirements to support EU and global efficiency goals, while sustaining the Green Deal and Net Zero Industrial Act.

We would also like to highlight that concerns about PFAS contained in some F-gas refrigerants are not appropriate to this revision. Recent findings from the [UNEP 2022 Assessment Report of the Environmental Effects Assessment Panel \(EEAP\) to the Montreal Protocol](#) concluded that no harm is anticipated even when assessing the growing use as replacement of ozone depleting substances.¹

Please find our industries' association letter attached. We would be available for a follow up discussion to provide more color on the background. Please let us know if we can be of assistance.
Kind regards,

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