

From:
Sent:
To:

sgezondheid);

Subject: Potential for end-use ban on the use of HFOs and HCFOs in insulation foams in the EU

Dear

On behalf of various elements of the European insulation foam manufacturers, we have been tracking the trialogue discussions that are on-going within the EU on the revision of the F-Gas Regulation (EC 517/2014). Although it is not absolutely clear what the current status is, we have picked up that there are proposals, led by the European Parliament and supported by the European Council and the Presidency to see a ban on all F-Gas use in insulation foams from 1st January 2030 onwards, as outlined in the square-bracketed text in blue below:

(20) Foams	- Extruded polystyrene (XPS) that contain HFCs with GWP of 150 or more, except when required to meet national safety standards.	1 January 2020
	- Foams other than Extruded polystyrene (XPS) that contain HFCs with GWP of 150 or more, except when required to meet national safety standards.	1 January 2023
	- <i>[that contain fluorinated greenhouse gases, except when required to meet national safety standards]</i>	<i>[1 January 2030]</i>

The insulation foam industry has consistently argued that such a ban would be counter-productive to the objectives of the European Green Deal, and particularly to the Renovation Wave, and has outlined these arguments regularly at various gatherings over recent months (see below):

Use of Fluorinated Gases as blowing agents for high efficiency

Product ban 19

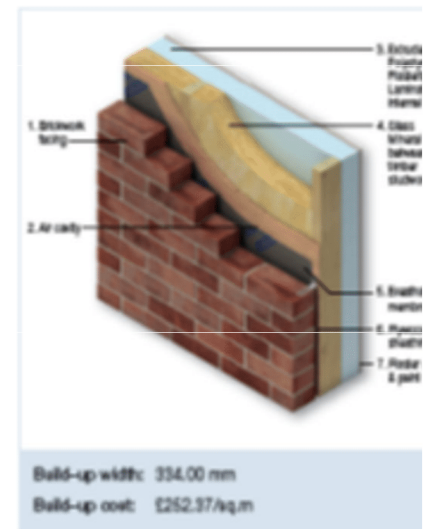
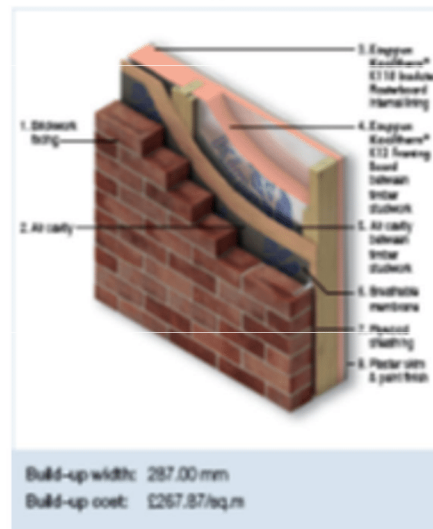
- The current F-Gas Regulation already requires insulation foams to use blowing agents with <150 GW
- Fluorinated gases are preferred because of their low flammability and excellent thermal insulating p
- HFOs and HCFOs maintain that high thermal performance which delivers energy and resource efficien
- In certain applications (e.g. PU Spray Foams), process safety would be compromised limiting building
- Industry welcomes the proposal of the Swedish Presidency not to adopt the universal 2030 ban (19b)

Impact assessment :

Although insulation values for new buildings are set at a statutory minimum, irrespective of insulation type, leaving design flexibility to the architect, the thicker building elements required to accommodate less efficient insulation materials can have a significant effect on the embodied energy arising from the building products used.

In renovation & refurbishment projects, the geometry of the building is already defined and available space becomes a key driver in respect of the additional energy that can be saved. Therefore, highly efficient insulation provides greater energy saving prospects. Since 80% of the buildings that will be standing in 2050 have already been constructed and are in use, the impact of losing high efficiency insulation will be substantial.

Timber Frame Wall Construction - Brick Outer Leaf
Width & Cost: Wall Build-ups



The industry therefore appeals to Belgium to consider these arguments closely as it seeks to take a position on the proposal to see the use of F-Gases in high performance thermal insulation foam restricted, primarily because such a ban would substantially inhibit building renovation at a time when improving the thermal performance of the built environment is of paramount importance – noting that 80% of the buildings that will be standing in 2050 have already been built. We think that, to a large degree, the call for a complete ban confuses the objectives of F-Gas Regulation and the proposed PFAS Restriction, which is something that we had understood the Spanish Presidency wanted to avoid.

Please let us know if you have any specific questions arising on this issue, since we would be glad to address them.

Best regards

– Regulatory & Sustainability Advisor



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