

De:
Envoyé:
À:
Cc:

Objet: RE: HFO 1234ZE supply problems

Dear

Thanks for the update. I really appreciate.

Concluding, we will have to wait for the final version of the agreed text before being able to act (in case this is required).

Regarding the advice about the EU PFAS restriction Proposal that was published in February/March, we have provided our comments on this proposal text in July during the consultation round that ended on the 25th of September. Now it's waiting for the outcome and the advices of the RAC and SEAC. We are also in close contact with Honeywell.

Vriendelijke groeten, Best regards, Cordialement

R&D - Quality

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Van:
Verzonden: woensdag 8 november 2023 11:34
Aan: @aero-sense.com>
CC:

Onderwerp: RE: HFO 1234ZE supply problems

Dear

Indeed, it gets clearer now. We are still awaiting the end version of the agreed text to have a clearer view on the new measures to come.

And you are right that a prohibition will be set in place for technical aerosols as of 2030. Your product falls under that category. Exemptions could be granted if there is a clear demonstration that there is no alternatives to the product and that the lack of it would create a security problem for the EU (or the Member States). The procedure to request such exemption is not yet defined by the Committee but I guess it will not defer much from the one we have now. The Company (or sector) must submit a file that describes the situation, the risk, the lack of alternative and a demonstration that any covered F-gas is the only solution. Updates will also be required after the derogation is granted (if so). It also has to demonstrate that research or development is ongoing to find an alternative. From my experience, the file needs to be strong and well documented. But this is what we do now, and the future may differ.

May I also advise you to follow closely the current request by some MS to include PFAS in the scope of the REACH regulation as many F-gasses (including HFO) may fall under those restrictions too. I'm not directly involved in this but this may be of importance for you.

So, for the time being, it is maybe better to wait for the publication of the new F-gas regulation. It should occur in the beginning of 2024.

I hope this helps.

Sincerely



Health
Food Chain Safety
Environment

Avenue Galilée / Galileelaan, 5 box 2 • 1210 Bruxelles • BELGIUM • www.health.belgium.be



From: aero-sense.com>

Sent: lundi, 6 novembre 2023 17:06

To:

Subject: RE: HFO 1234ZE supply problems

Dear

Any update?

Your feedback will be highly appreciated.

Vriendelijke groeten, Best regards, Cordialement

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Van:

Verzonden: dinsdag 17 oktober 2023 14:20

Aan:

Onderwerp: RE: HFO 1234ZE supply problems

Dear

Last week I was informed there was an F-Gas announcement (links below) mainly confirming the consumption of hydrofluorocarbons (HFCs) will be completely phased out by 2050.

There was also news for aerosols where HFO1243ze will be banned from 2030 in technical aerosol applications (statement below) with possible exemptions to the ban when safety concerns are involved.

- [Fluorinated gases and ozone depleting substances: Council and Parliament reach agreement - Consilium \(europa.eu\)](#)
- [Deal reached on reducing fluorinated gas emissions in the EU | News | European Parliament \(europa.eu\)](#)

Please find attached also a Honeywell document with a summary of the recent F-Gas Regulations announced last week and the proposed ban of Technical Aerosols in 2030.

I would require more details to be given to fully understand, but I guess that our technical aerosolized products 'Aircraft Insecticides' would fall under the scope of an exemption on the ban when safety concerns are involved. It's of an utmost importance that aircraft disinsection products, which are also subject of the EU BPR, are non-flammable and fulfil the technical requirements of the space spraying application method.

Main question for us at this moment: what will be the pathway to obtain an exemption subject to safety requirements so we can continue to use HFO to manufacture technical aerosols like aircraft insecticides?

Any information yet available on this subject?

Vriendelijke groeten, Best regards, Cordialement

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Van:

Verzonden: dinsdag 10 oktober 2023 17:30

Aan:

Onderwerp: RE: HFO 1234ZE supply problems

Dear

Any further update yet about the ongoing discussion about the proposition to amend/adapt the EU F-Gases regulation?

Vriendelijke groeten, Best regards, Cordialement

R&D - Quality

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Van:

Verzonden: dinsdag 25 juli 2023 15:48

Aan:

CC: Evi Chielens (SPF Santé Publique - FOD Volksgezondheid) <[REDACTED]@health.fgov.be>

Onderwerp: RE: HFO 1234ZE supply problems

Dear Dieter,

The F-Gar New Regulation is still under negotiations.

Sincerely yours.

From: [@aero-sense.com](mailto:info@aero-sense.com)>

Sent: mercredi, 19 juillet 2023 10:49

To:

Subject: RE: HFO 1234ZE supply problems

Dear ,

Any further update yet about the ongoing discussion about the proposition to amend/adapt the EU F-Gases regulation?

Vriendelijke groeten, Best regards, Cordialement

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Van:

Verzonden: maandag 15 mei 2023 17:03

Aan: [aero-sense.com](mailto:info@aero-sense.com)>

Onderwerp: RE: HFO 1234ZE supply problems

The one million € questions. ;o)

Nothing can be said but the intention is that all is finalized in 23 and put into force in January 24 !

From: [@aero-sense.com](mailto:info@aero-sense.com)>

Sent: lundi, 15 mai 2023 16:55

To:

Subject: RE: HFO 1234ZE supply problems

Dear ,

Thanks for the update.

When can we expect an outcome of the ongoing discussions?

Vriendelijke groeten, Best regards, Cordialement

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Van:

Onderwerp: RE: HFO 1234ZE supply problems

Dear Mr. ,

About your first questions, I see in Annex II some HFO (HFC-1234**, 1336 and 1233**) So if you are using them, you may be under the controlled uses.

Then the amendment you found are the one proposed by the Parliament for the Trilogue. I know the procedure is a bit complicated but now, the Commission, the Council (through the Presidency) and the Parliament will sit together to discuss a compromise. So until this is over, there is no certainty of the outcome.

I do agree that an exemption may be needed but this would be assessed against the official version when it will be published. No date defined yet, this will depend of the discussions.

And please note also that in CC) for the front office contacts.

Sincerely

Federal Public Service Health, Food Chain Safety and Environment - BELGIUM

From: aero-sense.com>

Sent: jeudi, 11 mai 2023 17:18

To:

Subject: RE: HFO 1234ZE supply problems

Dear ,

Thanks for the feedback.

In the meantime, I've performed some extra research and came up with the following information. We are specifically interested into the future of HFO-molecules that are used as a propellant gas for the production of non-flammable technical aerosols.

Via the website of the F-Gas Regulation, I came up with the official documents of the Commission proposal on fluorinated greenhouse gases.

First of all, Article 2 'Scope' is introduced and clearly states:

Article 2

Scope

1. This Regulation applies to the fluorinated greenhouse gases listed in Annex I and II, whether alone or in a mixture.
2. This Regulation also applies to products and equipment, and parts thereof, which contain or are filled with fluorinated greenhouse gases.

Looking at the chemicals mentioned in Annex I, II and III ([Annexes to the proposal](#)), there seem no HFO-molecules to be included!

As a consequence, we can conclude that the HFO-molecules are not in the scope of the Commission proposal on fluorinated greenhouse gases.

Can you confirm my conclusion/statement is correct?

Secondly, I found the following document: REPORT on the proposal for a regulation of the European Parliament and of the Council on fluorinated greenhouse gases, amending Directive (EU) 2019/1937 and repealing Regulation (EU) No 517/2014 | A9-0048/2023 | European Parliament (europa.eu) which includes some extra amendments compared to the Commission proposal on fluorinated greenhouse gases.

This Report on the proposal includes some interesting parts for technical aerosols:

- Amendment 16: Proposal for a regulation – Recital 13:

Amendment 16

Proposal for a regulation

Recital 13

Text proposed by the Commission

(13) Where suitable alternatives to the use of specific fluorinated greenhouse gases are available, bans should be introduced on the placing on the market of new equipment for refrigeration, air-conditioning and fire protection that contains fluorinated greenhouse gases or whose functioning relies upon those gases. Where alternatives are not available or cannot be used for technical or safety reasons, or where the use of such alternatives would entail disproportionate costs, it should be possible for the Commission to authorise an exemption to allow the placing on the market of such products and equipment for a **limited** period.

Amendment

(13) Where suitable alternatives to the use of specific fluorinated greenhouse gases are available, bans should be introduced on the placing on the market of new equipment for refrigeration, air-conditioning and fire protection, **and technical aerosols** that contain fluorinated greenhouse gases or whose functioning relies upon those gases. Where alternatives are not available or cannot be used for technical or safety reasons, or where the use of such alternatives would entail disproportionate costs, it should be possible for the Commission to authorise an exemption to allow the placing on the market of such products and equipment for a period **of maximum 4 years. The**

- Amendment 145: Proposal for a regulation – Annex IV – table: Addition of 20a

Products and equipment	
Where relevant, the GWP of mixtures containing fluorinated greenhouse gases shall be calculated	
(20)	Technical aerosols that contain HFCs with GWP of 150 or more, except when required to meet national safety requirements
(20a)	Technical aerosols that contain fluorinated greenhouse gases, except when required to meet national safety requirements

The Annex IV 20(a) amendment is included into the Report on the proposal, but not in the official documents of the Proposal => very important discrepancy which confuses me.

If this amendment (20a) would be installed, it would apply to "fluorinated greenhouse gases" as defined in Article 2(Scope) which I already explained above.

Anyway, there are currently no alternatives for HFO 1234ze to manufacture a safe and non-flammable technical aerosol like aircraft disinsection products.

Therefore, an exemption will be justified.

Thanks for the feedback in advance

Vriendelijke groeten, Best regards, Cordialement

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Van:

>

Verzonden: maandag 8 mei 2023 14:33

Aan: @aero-sense.com>

Onderwerp: RE: HFO 1234ZE supply problems

Geachte

,

Ja ik bevestigd dat de HFOs onder de controle van de verordening zullen vallen.

Tot nu toe kunnen we niet meer dan de voorstel van de [Commissie](#) en de positie van de [Raad](#) en het [Parlement](#) kennen, maar de einduitkomst kennen we nog niet.

Wanneer een eindversie zal beslits worden plannen we (BE) de informatie te verspreiden en verklaren ook de inhoud van de nieuwe teksten.

U kan deze voostellen op het Internet vinden.

Federal Public Service Health, Food Chain Safety and Environment - BELGIUM

From: aero-sense.com>

Sent: vendredi, 28 avril 2023 11:31

To:

Subject: RE: HFO 1234ZE supply problems

Importance: High

Geachte ,

Wij werden vandaag geïnformeerd dat de HFO-molecules nu ook in de scope van de F-Gases regulation zouden worden opgenomen mbt een ban vanaf 2030.

Is deze informatie correct? Is hieromtrent enige informatie beschikbaar?

Alvast bedankt voor de feedback.

Vriendelijke groeten, Best regards, Cordialement

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Van:

[aero-sense.com](mailto:info@aero-sense.com)>

Onderwerp: RE: HFO 1234ZE supply problems

Dear ,

First of all, please keep in mind this is only a guess, no confirmation.

And I will keep you posted of any evolution. My position would be to clearly and firmly oppose such derogation should it be asked.

Sincerely.

From:

Sent: mardi, 28 juin 2022 14:10

To:

Subject: RE: HFO 1234ZE supply problems

Dear ,

Please keep us posted, because if France would grant an exemption or derogation to our competitors, this would have huge consequences.

Moreover, I don't quite understand what our competitors would do with an exemption.

Their product dossier under the EU Biocidal Products regulation has been adapted and the formulation that was authorised is based on HFO.

It's not because they obtain an exemption to re-use HFC 134a, that this would be allowed under the EU BPR.

Best regards,

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Van:

[aero-sense.com](mailto:info@aero-sense.com)>

Onderwerp: RE: HFO 1234ZE supply problems

Yes, of course (and sorry for the delay in replying, I was abroad for a mission).

My colleague from France asked me if you are also facing the same problem. And I guess they would ask implicitly if Aero-Sense would submit a request for derogation. But this is a guess only. I've just sent this question to them.

Sincerely yours.

From:

Dear Mr.

Honeywell has some issues with deliveries of HFO in Europe.
Can I ask for the reason of this question?

Best regards,

R&D - Quality

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Van:

[@aero-sense.com](mailto:info@aero-sense.com)>

Onderwerp: HFO 1234ZE supply problems

Hello,

I would like to know if you have any problems with the supply of HFO for insecticides at the moment.

Thank you in advance.

Federal Public Service Health, Food Chain Safety and Environment - BELGIUM