

From: [REDACTED] <[REDACTED]@epeeglobal.org>
Sent: Monday 2 October 2023 14:22
To: CAB SIMSON CONTACT; [REDACTED] (CAB-SIMSON); [REDACTED] (CAB-SIMSON); [REDACTED] (CAB-SIMSON); [REDACTED] (CAB-SIMSON)
Cc: [REDACTED]
Subject: EPEE - Request for a face to face meeting on a critical matter for the RACHP industry

Dear Commissioner

Dear I [REDACTED]

I trust this email finds you well and my apologies in advance to be writing to several of you, but our industry is facing a key issue – please see the details below – which requires your urgent attention.

Since I wrote to the Commissioner, the issue of the revision of the F-Gas Regulation is going to be discussed in the 4th Trilogue on the 5th of October and apparently the principle of energy efficiency might be undermined which goes against EU regulation.

With this email I ask for an urgent face to face meeting as soon as possible or failing this, a Teams call before the 5th of October Trilogue.

Please could you have let me know what is possible from your side and I take this opportunity to thank you for your attention and cooperation in this critical matter for the RACHP industry.

With kind regards, [REDACTED] EPEE

From: [REDACTED]
Sent: Saturday, 23 September 2023 22:09
To: [REDACTED]@ec.europa.eu
Cc: [REDACTED] <[REDACTED]@epeeglobal.org>
Subject: EPEE - Request for a face to face meeting on a critical matter for the RACHP industry

Dear Commissioner Simson

I am following up on my previous email (see below) with regard to seeking a meeting as this is now getting extremely urgent for our industry.

I sincerely thank you in advance for your attention and cooperation in this critical matter for EPEE.

With kind regards, [REDACTED], [REDACTED] European Partnership for Energy and the Environment

Dear Commissioner Simson,

I am contacting you on behalf of the European Partnership for Energy and the Environment (EPEE) which represents the refrigeration, air conditioning, and heat pump sector (RACHP) in Europe.

We are following a very critical piece of legislation for our industry, the revision of the F-Gas Regulation, which is now in the final stages of the Trilogue negotiations.

Following the latest Council ENVI Working party on the 12th of September, **we wish to highlight our major concerns (see points below) and to request a high-level meeting with yourself** to allow us to explain the drastic situation which is developing.

Several of our members' CEO/Responsible VPs will gladly meet you at your best convenience at your offices in Brussels.

On behalf of EPEE, I thank you for your consideration and look forward to hearing from you with regard to our request for a meeting. Should you require further information please do not hesitate to contact me at

[@epeeglobal.org](mailto:info@epeeglobal.org), Tel: +32 [REDACTED]

Sincerely, [REDACTED], European Partnership for Energy and the Environment

Who is EPEE:

All EPEE's member companies and associations are fully committed to EU carbon neutrality by 2050 and represent the industries that will deliver on decarbonising buildings and cold chains through innovative heating, cooling, and refrigeration solutions.

Our members employ more than 200,000 people in 22 European countries across more than 100 factories and R&D centres, representing substantial investments in the European industrial fabric. EPEE members manufacture products that use both fluorinated and non- fluorinated (so-called "natural") refrigerants, and we have consistently provided feedback and guidance on the current revision of the F-gas Regulation to support the EU's sustainability goals and ensure that workable and pragmatic legislation is adopted.

Our key concerns are:

The decarbonization goal is now in jeopardy, as negotiations in the final round of the trilogues revolve around the incorrect assumption that F-gas refrigerants are simple to replace. 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.

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 (see footnote).

Some believe that all F-gases can simply be replaced with so-called "natural" refrigerants. While non-fluorinated refrigerants are part of the solution to an HFC phase down and are already being used by our members, they also come with caveats on safety and affordability, meaning they cannot fulfil all market needs of member states. They also demand more consideration with regards to space. Taking the example of residential heat pumps, mainly detached homes with gardens will be able to 'easily' use non-F-gas refrigerants.

There is a particular concern in the air conditioner, heat pump, rooftop and chiller markets, where a restriction to "natural refrigerants" only would result in less widespread decarbonization of heating in homes and commercial and industrial spaces. Indeed, we risk creating a predicament in which many may be forced to keep or install an inefficient fossil fuel appliance rather than an efficient and climate-friendly system.

Our industry is committed to rolling out the millions of heat pumps required to achieve our efficiency goals, with and without F-gases. Weeks remain to create a clear, balanced, and workable F-gas revision. Now is the time to be realistic: We caution that the revision must not restrict innovation in such a manner that future alternatives would not be allowed simply because they contain fluorine.

We urge you not to ban all F-gases under Annex IV and to maintain appropriate GWP limits as a solution for the RACHP sector in the future.

End.

¹ [2022 Assessment Report of the Environmental Effects Assessment Panel Report](#): "the accumulated amount of TFA is expected to increase because of the planned replacement of ozone depleting substances with short-lived fluorinated chemicals. However, based on projected future use of these precursors of TFA, no harm is anticipated." Page 25.