

## SPF Santé Publique - FOD Volksgezondheid

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**From:** Luys Pieter  
**Sent:** mardi, 27 juillet 2021 17:23  
**To:**  
**Cc:**  
**Subject:** EPEE - Concerns about including F-Gases under a REACH restriction proposal on PFAS  
**Attachments:** EPEE - PFAS regulation under the EU F-Gas Regulation 31 March 2021 - FINAL.pdf;  
EPEE - PFAS REACH Restriction Position Paper - 31 March 2021 - FINAL.pdf

Bonjo

We recently received a mail from the EPEE (see mail below and annex), in which they ask for a meeting to express their concerns on the upcoming General PFAS Restriction proposal. The EPEE is concerned that the Restriction proposal might hamper the decarbonization of the industry, and that there will be an overlap with the F-gasses regulation.

What are your thoughts about this concern? Do you think the arguments they are presenting are valid?

Many thanks in advance for your feedback!

Kind regards,

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Attaché Risicobeheersing van Chemische Producten  
DG Leefmilieu – Afdeling Productbeleid en Chemische Stoffen  
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Van: FGAS <[REDACTED]@epeeglobal.org>

Verzonden: mardi, 20 juillet 2021 10:17

Aan:

CC:

Onderwerp: EPEE - Concerns about including F-Gases under a REACH restriction proposal on PFAS

Dear Mr

I am writing to share EPEE's strong concerns about a proposal made by Denmark, Germany, Norway, Sweden, and the Netherlands to include F-Gases under a broad REACH restriction on PFAS. We received your contact details from Tine Cattoor of Essenscia and would greatly appreciate the opportunity to arrange **a virtual meeting** with you and your colleagues to further discuss our concerns and the next steps with the restriction following the [registration of restriction intention](#) on 15 July.

As you may well know, EPEE has always been a strong supporter of the F-Gas Regulation and – on a global level – of the Kigali Amendment. Therefore, in our attached position papers (PFAS – EU F-Gas Regulation), we emphasize that the F-Gas Regulation is the most suitable framework establishing measures already adequately taking into account safety, energy efficiency, environment and health. Furthermore, the current review of the F-Gas Regulation offers an excellent opportunity to further strengthen it – for example by extending the recovery, recycling and reclamation (RRR) requirements to all refrigerants, including HFOs and non-fluorinated gases. This would effectively mitigate emissions across their life-cycle.

We would also like to note that a REACH restriction of F-Gases could slow down substantially the decarbonisation of multiple sectors, heating (which still relies with over 75% on fossil fuels) being one of them. All refrigerants, including HFOs and lower GWP HFCs, are essential for the safe, energy efficient operation of heat pumps which need to be broadly deployed to achieve the 2030 targets and climate neutrality by 2050. We are currently in process of finalising new modelling with the support of Gluckman Consulting and UNEP which – among others – will help visualise the important contribution of heat pumps to meet these targets. More information can be found in the attached position paper (PFAS – REACH Restriction) that combines EPEE's technical submissions to date on this issue.

Please do let me know if you have any questions. We very much look forward to hearing from you regarding your availability to discuss this pressing issue in more detail.

Kind regards,

**EPEE – European Partnership for Energy and the Environment**

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