

SPF Santé Publique - FOD Volksgezondheid

From:
Sent: vendredi, 5 mai 2023 15:38
To: Fluor Gas Federal Belgian Authority (SPF Santé Publique - FOD Volksgezondheid)
Cc: Publique - FOD Volksgezondheid)
Subject: The new fgas is a key file for EU independence and the REPowerEU - a message from EEB
Attachments: eeb on fgas revision Belgio.pdf; Fluorspar-IMFORMED-Mineral-Minutev4.pdf; propane availability.png.png
Importance: High

Dear M

Please find attached a short letter from EEB expanding two underexplored arguments around the Fgas regulation debate:

- 1) Fgas production is largely an extra-EU story. The EU largely imports refrigerants whose raw material (Fluorspar) is a critical one, and it is largely in the hands of China (see attachment). We think it is strategic to secure EU's independence in this sector.
- 2) The existing production capacity of alternative solutions (natural refrigerants) is fit for purpose to cover the whole EU need for refrigerants and foams (see graph)
- 3) The cost of transition might hit hard on Member States' administrations. The main source of money to cover those costs is the allocation fee, building on the "polluter pays" principle.
- 4) Contrary to F-gas, Illegal trade of natural refrigerants is unlikely to take place because they are too cheap to risk sanctions.

For these reasons, on top of the many, well-known environmental ones, we call on you to support:

- Higher ambition in the phase down, as the European Parliament did.
- Early bans of Fgas in all applications where technology is there or will shortly be there.
- A ban on products that are or might become PFAS.
- Higher allocation fees.
- Stronger training provisions with clear KPIs.

We would be very happy to have an exchange with you on these points and other around the Fgas regulation debate, at your earliest convenience.

All the best

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The European Environmental Bureau (EEB) is Europe's largest network of environmental citizens' organisations, standing for environmental justice, sustainable development and participatory democracy.

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