



Meeting with Honeywell 19 March 2024

Participants:

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Commission: Aurel Ciobanu Dordea, [redacted] (ENV)

Honeywell had requested the meeting to inform about the importance of HFO in view of the on-going U-PFAS restriction process, highlighting the importance of the use of HFO in different applications e.g. automobiles refrigerants, medical aerosol based applications, in heat pumps where it plays a role in heat transfer.

HFO has been under development for a long period for a number of intended uses, where it is safe and effective. HFO is already vigorously regulated. It is regulated under the F-gasses Regulation, with a containment obligation. Due to its low Global Warming Potential of 1, it is not subject to phase-out obligations, but it must be contained and used under strict conditions. The overall regulatory approach by the EU co-legislators is complicated and Honeywell has noted with concern the latest restrictions on PFAS (packaging and packaging waste). Honeywell is concerned with the fact that HFO currently falls under the scope of the U-PFAS dossier definition. This is not warranted as HFO is not a PBT, only TFA is break down product, which is mobile but not accumulated. There are different alternatives to HFO, but ammonia is flammable, propane is explosive (and therefore not allowed in FR building codes) and CO₂ requires expensive equipment due to its workability only at very high pressure.

We explained the current process under the REACH restriction where it is the task of the RAC in the first place to review if the substances covered by the dossier fulfil the scientific criteria for a REACH restriction. This will be followed by a socio-economic assessment by SEAC that will also consider available alternatives. Regardless of the on-going process on PFAS, any company involved with the use of PFAS substances are recommended to consider where the use is strictly needed and focus on finding safer alternatives. It is not possible to prejudge the scope of the future REACH restriction, but care will be made to ensure a balance between policy objectives where at present there are no alternatives to PFAS.

Thanks,

