



Honeywell Fluorine Products Europe B.V.

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Ministry of Trade, Industry and Fisheries
Attn.: Erling Rimestad
Director General, Trade Policy Department

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Dear Mr. Rimestad,

We are writing you in relation to the PFAS REACH restriction proposal that was entered into the registry of restriction intentions of the European Chemicals Agency on 15 July 2021 by five EU/EEA countries and the unintended impact that this restriction may have on the Norwegian economy and on achieving the objectives under the Paris Agreement and the EU Green Deal. Decarbonization and the reduction of the emission of greenhouse gases (thereby limiting the global warming to less than 2 degrees centigrade) are key interlinked global policy objectives.

Honeywell is a strong supporter of these objectives and we believe that we make an important contribution to achieving them. For example, to date, the use of our Solstice HFO refrigerants and blowing agents has helped avoid the release of nearly 250 million metric tons of CO₂e¹ into the atmosphere so far, an equivalent to removing over 50 million cars from the road, more than all passenger cars registered in Germany. Furthermore:

- Honeywell is a recognized and established B2B supplier of innovative chemicals to various enterprises in Norway.
- Our customers use our products to manufacture various *high added value* final products (including air-conditioning and refrigeration systems, medical packaging and devices, various electronics, building insulation foams, etc.). Our business partners in Norway are leading suppliers and manufactures including SMEs and start-ups.
- Honeywell's products contribute to the important innovative downstream projects in sectors such as pharmaceuticals, automotive (incl. electric vehicles), refrigeration, renewable energy, construction, as well as electronics.

The expected approach of the proposing countries, confirmed in the recent registration of the intent, is to expand the current definition of what constitute a PFAS, and to regulate thousands of substances never before considered as PFAS as one single group. In our view, this approach does not sufficiently consider the recently issued OECD guidelines, which emphasizes that PFAS is a broad, general, nonspecific term, which does not inform whether a compound is harmful and is not a basis for regulation.²

The new definition would, amongst others, include HFOs (a refrigerant with low global warming potentials that are used in applications such as refrigeration, air conditioning, building insulation, personal and household care) and PCTFE (a fluoropolymer that is used in high-barrier pharmaceutical packaging). In our view, capturing these two substances under the definition of PFAS is not scientifically justified, because they do not pose risk to human health or the environment. The total costs for society should such a blanket ban be enacted would be very high (particularly for SMEs) and disproportionate to the alleged health and environmental risks which are being used to justify this future possible restriction.

¹ HFO Climate Impact (fluorineproducts-honeywell.com)

² OECD (2021), Reconciling Terminology of the Universe of Per- and Polyfluoroalkyl Substances: Recommendations and Practical Guidance, OECD Series on Risk Management, No. 61, OECD Publishing, Paris.

The proposed restriction would prohibit Honeywell from continuing to supply any HFOs and PCTFE to their partners and customers in Norway. It could consequently have a negative impact on the businesses of these customers and (consequently) on the employment provided by these customers in Norway.

Most importantly we believe, the restriction could negatively impact the ability of Europe and its countries to achieve the ambitious decarbonisation and energy efficiency objectives already agreed in particular in the Paris Agreement and the EU Green Deal. For example, it would lead to a replacement of HFOs by alternatives with a greater environmental impact from reliability or safety issues and often with more indirect emissions, resulting largely from the energy used.

As we know these matters are important to you, we would very much value the opportunity to discuss the impact of the PFAS REACH restriction proposal on the Norwegian economy and on achieving the objectives set out in the Paris Agreement and the EU Green Deal with you.

Kind regards,

A handwritten signature in black ink, appearing to read 'Julien Soulet', with a stylized flourish at the end.

Julien Soulet
Vice President and General Manager for Advanced Materials EMEA