

From:
Sent: mardi, 14 mars 2023 09:17
To:
Cc:
Subject: Request for a meeting - Revision of F-Gas Regulation - Douglas Products, Thermo Fisher Scientific and Viessmann

Dear M

I hope this email finds you well.

Following our earlier exchange on the F-Gas Regulation review, we would like to touch base with you to discuss the most recent developments around this file in view of the next steps in the co-decision process.

For background information, the ENVI Committee has voted recently on their [position](#) on the file, which needs to be ratified in Plenary on 29 March. Meanwhile, we know you and other Member States are negotiating the final text for the upcoming General Approach. In this context, we would like to meet with you to discuss these developments and share our most up-to-date views on the different matters impacting our clients – Douglas Products, Viessmann and ThermoFisher. Our aim is to ensure Member States' authorities have a clear overview of the potential impacts on the relevant industry at this very crucial step so that we ensure that the final F-Gas Regulation text is well-balanced. Meeting with you is also especially relevant since we would expect the Belgian presidency to close the trilogue negotiations on this file.

We would like to propose having a meeting to discuss the following topics in greater detail:

Topics on which we shared relevant information:

- Douglas Products - Sulfuryl fluoride's first-time inclusion in the FGR and the ENVI Committee's position on imposing a restriction of the substance's use by 2030 as well as specific recovery obligations (Article 13 and Article 4 respectively).
- Viessmann – Heat pumps and natural refrigerants – potential changes to Annex IV as regards self-contained/monobloc heat pumps (Annex IV, point 17).

Additional topic:

- Thermo Fisher Scientific – Stationary refrigeration equipment (SRE) and the current exemption for using f-gases in SRE to cool products below -50°C (Article 11, Annex IV (point14) and Article 13).

We would welcome your thoughts and surely be interested in exchanging with you on these issues as a matter of priority. We understand from last time around that you were not in the position of meeting with individual stakeholders. Nevertheless, we wanted to explore this possibility again in case this situation has changed. Otherwise, we would be interested to hear from you about other ways through which we can communicate with you on these matters.

Please let us know if you have any questions and whether you would be available for a proposed meeting in the upcoming weeks to discuss these developments further. We would be happy to accommodate your schedule and preferences.

We thank you for your time and consideration and look forward to hearing from you soon.

Best regards,

From:
Sent: Friday, 11 November 2022 18:32
To:
be>
Cc: [REDACTED]@environment.belgiu

Subject: F-Gas Regulation revision - Douglas Products - Market Paper

Dear Mr

I hope you are doing well.

In the context of the FGR discussion, and following our earlier exchange on this matter, specifically on the inclusion of Sulfuryl Fluoride (SF) in Annex II, I would like to share with you a market overview of SF including an analysis of alternatives to SF for your consideration. We also have included a presentation with a focus on SF use and alternatives in wood exports.

We hope the information can be useful in the upcoming discussions in the Council. As you may have seen, developments in EP on this matter are particularly worrying. Indeed the Greens' Rapporteur has proposed a straightforward ban of SF, which not only is legally doubtful (as its use and place on the market is regulated under the BPR and PPPR) but also will cause severe negative consequences given the lack of alternatives. As already explained, we believe the FGR is not the adequate instrument to regulate SF use but rather should be an instrument to help monitor and control emissions of SF (until now not yet monitored at EU level).

Moreover, the Greens' Rapporteur is also proposing recovery obligations specific to SF under Article 4, which are not yet technically or economically feasible in any SF applications, at least for the near future.

We would be interested to hear your thoughts about the paper and the latest developments happening in Council and Parliament. Also, is there any news regarding the FGR roundtable?

Thank you for letting us know!

Best regards,

From:
Sent: Wednesday, 21 September 2022 11:33
To:
m.be' <[REDACTED]@environment.belgium.be>;
,

Subject: RE: Meeting request - F-Gas Regulation revision - Position Papers

Dear M

It was nice to speak to you on the phone last week.

As promised, we are sharing the positions of both my clients Viessmann (on Refrigerants - PPT) and Douglas Products (on Sulfuryl Fluoride - PDF) as regards the FGR proposal.

Regarding the topic of SF, one thing I forgot to mention and you will see it in the paper. Belgium is one of the main markets of SF in Europe since SF is mainly used in ports to fumigate shipping and quarantine containers that are sent to non-EU countries. The main goal is to prevent invasive species in global trade (e.g. used to fumigate timber logs from Central Europe that are mainly exported to countries like China, Australia or New Zealand)

As said, we would be happy to discuss these matters with you on a call given their importance. Of course, we would also welcome the opportunity to participate in any roundtable you are planning to organise in the upcoming future.

We remain at your disposal should you have any comments or questions.

Best regards,

From:

Sent: Monday, 29 August 2022 15:25

To: '

Subject: RE: Meeting request - F-gases in F-Gas Regulation revision

Dear Mr

I hope you are doing well and had a relaxing summer break.

I am following up on my previous email (below) to see whether it would be possible to organise a meeting with you in the next weeks to discuss the FGR review.

We are mostly flexible as of 13 September to meet you in person in Brussels and we would appreciate very much the opportunity to exchange views on this very important dossier

Thank you very much in advance and do not hesitate to contact us if you have any questions.

Best regards,

From:

Sent: Wednesday, 29 June 2022 10:18

To:

Subject: Meeting request - F-gases in F-Gas Regulation revision

Dear Mr

I hope you are doing well.

My name is Carlos Sokol-Szahin and I am working at EPPA which is a Brussels-based regulatory/public affairs consultancy, specialising in chemicals, sustainability and energy issues among others. I am reaching out to you to request a meeting to discuss the revision of the F-Gas Regulation (FGR).

Our request concerns two areas impacted by the proposed FGR: (1) Refrigerants (including hydrofluorocarbons (HFCs), hydrofluoroolefins (HFOs) and natural refrigerants) which are used in heat pump and air conditioning applications and (2) Sulfuryl Fluoride (SF₆), which is a broad-spectrum fumigant that is being used globally for pest control – for example, to fight bark beetles, stink bugs and woodworms.

Regarding the first area, we would like to invite our client Viessmann to the meeting. To give you some background information, Viessmann is a leading German/European company in the manufacturing of heating, industrial and refrigeration systems. In the past months, Viessmann has contributed to the F-Gas Regulation revision process by participating in the stakeholder meeting in May 2021 and submitting input to the public consultation, which ran from September to December 2020. Moreover, Viessmann has also participated in the two Calls for Evidence on the upcoming REACH PFAS restriction - July 2020 and October 2021 – which also touches upon the issue of f-gases. In fact, Viessmann was recently invited by the Belgian MSCAs to present and discuss the upcoming PFAS restriction dossier

(which will be notified to ECHA in January 2023) on the topic of f-gases used in heat pumps. On this basis, our client would like to present its position and analysis of some of the aspects that could be improved in the FGR proposal, supported by a socio-economic analysis we did for them at EPPA. We would be glad to exchange views with you on the feasibility to speed up the transition to suitable and sustainable future-proof alternatives in the heat pump market and discuss our forward-looking proposals for the next steps.

We would also like to take advantage of the meeting to discuss, on behalf of our client Douglas Products, another aspect arising from the review, namely the inclusion of the Sulfuryl Fluoride in Annex II, Section 3, of the Regulation. This fumigant is said to have a significant impact on global warming. However, there is evidence showing that the quantities of SF released into the atmosphere are far less than those of carbon dioxide and its real impact on global warming is very limited. This is reflected by the fact that SF has not been listed up until now under the Kyoto Protocol, nor under the Paris International Climate Agreement as a relevant greenhouse gas. In this case, we would like to take some time of the meeting to present to you Douglas Products' views on the FGR, the facts around SF as well as discuss how the Commission's proposal could be further improved. We could discuss both issues in the same meeting, or organise a subsequent meeting on the latter if that is more appropriate.

If the meeting request is agreeable to you, could you please let us know when it will be suitable for you in the next weeks to have a meeting? We will be happy to send WebEx invitations or have the meeting in person.

Many thanks in advance for your reply. We remain available should you have any questions or require additional information from us in the meantime.

Best regards,

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