

From:
Sent: jeudi, 1 avril 2021 11:20
To:
Cc:
Subject: EPEE's 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

Dear ,

I hope all is well and that you are able to enjoy the arrival of spring despite the on-going corona constraints.

I am writing to share EPEE's strong concerns about a proposal made by 5 Member States (Denmark, Germany, Norway, Sweden, The Netherlands) to include F-Gases under a broad REACH restriction on PFAS.

We would greatly appreciate the opportunity to e-meet with you and your colleagues to further discuss our concerns and to brainstorm together on next steps.

As you 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 paper (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.

I very much look forward to hearing from you, when you would have availability to discuss this pressing issue in more detail.

Kind regards,

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Director General

GSM :