

From:
Sent: lundi, 17 juillet 2023 11:53
To:
Subject: EU F-gas: Clean Cooling Coalition supports exit from F-gases where technologically feasible

Dear ,

I hope this email finds you well and you had a smooth travel back from Bangkok.

Just a quick email to remind you our position on this file: I know we have exchanged lengthily on this, but as the final deal might be agreed upon this coming Wednesday, I wanted to make sure that our position is clear on the different provisions of this Regulation.

On bans.

1. We support the decoupling provisions introduced by the European Parliament. We also support a delay in the bans, provided these contain the wording "any fluorinated greenhouse gases" rather than introducing GWP levels.
2. On ban 10 - we support the phase out of F-gases as soon as feasible. Hydrocarbons have already taken the market since long ago in Europe.
3. On ban 11 - we support the phase out of F-gases as soon as feasible. Hydrocarbons can be a solution in most of the settings where these systems can be placed. In case, the wording related to safety requirements and allow a GWP of 150 can be introduced, provided the ban on F-gases is in place.
4. On ban 12 - we support the phase out of F-gases as soon as feasible. Hydrocarbons can be a solution in most of the settings where these systems can be placed. In case, the wording related to safety requirements and allow a GWP of 150 can be introduced, provided the ban on F-gases is in place.
5. On ban 13 - we support the phase out of F-gases as soon as feasible. Hydrocarbons and transcritical systems are the f-gas solution. We do not support carving exemptions for chillers and ultra low temperatures, as these applications are deployed today with alternatives to f-gases, or anyhow, fluorinated refrigerants with a GWP below 2500.
6. On ban 15 - we support the phase out of F-gases as soon as feasible. Hydrocarbons can be a solution in most of the settings where these systems can be placed. In case, the wording related to safety requirements and allow a GWP of 150 can be introduced, provided the ban on F-gases is in place.
7. On ban 17 - we support the phase out of F-gases as soon as feasible. Hydrocarbons can be a solution in most of the settings where this systems can be placed. In case, the wording related to safety requirements and allow a GWP of 150 can be introduced, provided the ban on F-gases is in place.
8. On ban 18 - we support the phase out of F-gases as soon as feasible in systems below 12 kW and above 200 kW. Hydrocarbons, CO₂ and ammonia can be a solution in most of the settings where this systems can be placed. For systems between 12 and 200 kW, we support the Spanish presidency proposal of GWP 150 by 2033 (D). In case, the wording related to safety requirements and allow a GWP of 150 can be introduced, provided the ban on F-gases is in place.

We are concerned to not see a mandate by the Presidency to compromise on mobile applications, such as transport refrigeration and air-conditioning systems. These systems, due to their installation, are normally subject to substantial leakage rates - and are detrimental to the climate due to the high GWP of the fluorinated refrigerants leaking (e.g., transport refrigeration systems are moving from a GWP of ca. 4000 to a GWP of 2000, despite systems with natural refrigerants are already on the market today).

Finally, we support a complete phase down of HFCs by 2050, provisions aimed at streamlining the adoption of training and certification for natural refrigerants, and a revision clause connecting the upcoming PFAS Restriction Proposal to this Regulation, as, in essence, the same substances are considered in both restrictive measures.

Thank you for your time, and see you in October in Nairobi.

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Kind regards,

Web: <http://www.atmosphere.cool>