(SPF Santé Publique - FOD Volksgezondheid)

From: owner-eucouncil-climat-[redacted]@envcoord.health.fgov.be on behalf of [redacted]ezondheid)

Sent: jeudi, 23 février 2023 10:21
To: [redacted]@envcoord.health.fgov.be
Subject: [eucouncil-climat-fluorinated_greenhouse_gases_review] FW: F-gas Regulation | EHI views on the Presidency compromise proposal
Attachments: 20221025 - EHI amendment proposals - correction.pdf

FYI

From:
Sent: jeudi, 23 février 2023 10:08
To: Alain Wilmart (SPF Santé Publique - FOD Volksgezondheid) <[redacted]@health.fgov.be>
Subject: FW: F-gas Regulation | EHI views on the Presidency compromise proposal

USAGE INTERNE - INTERN GEBRUIK

FYI

From:
Sent: Thursday, 23 February 2023 09:43
To:
Cc:
Subject: F-gas Regulation | EHI views on the Presidency compromise proposal

To: Mr , Permanent Representation of Belgium to the European Union

Dear Mr ,

We are contacting you concerning the F-gas Regulation, notably in reaction to the latest compromise proposal from the Swedish Presidency.

While we do welcome the increased ambition brought in by the Swedish Presidency, we want to raise our concern on the impact of certain provisions introduced and that we summarised below in the email.

At the European Heating Industry, we represent manufacturers of **hydronic heat pumps** systems, which are produced in the EU for the European market, and are connected to water-based radiators (typical system in existing building stock) and water-based underfloor heating. As an industry, we support the general objectives of the F-Gas Regulation proposal to cut CO2 emissions and of REACH to avoid harmful substances entering the environment. REPowerEU sets a hydronic heat pump target of **10 million new units by 2027** to decarbonise buildings and we believe that this target is in principle **compatible with the phase-down of fluorinated greenhouse gases** as proposed in the revision of the F-Gas Regulation.

Manufacturers of hydronic heat pumps are investing at unprecedented scale and speed in future-proof sustainable heat pumps to meet REPowerEU targets through the rapid scale up of EU-based manufacturing capacity, including heat pumps running on natural refrigerants. EHI members are planning on investing **over €3billion** in heat pump production compatible with these goals. The new F-Gas Regulation can provide the necessary framework to enable such continued investments and value creation for hydronic heat pumps in Europe, as a key technology for a successful green transition.

The following are, in our views, key components of such a framework:

- To ensure a clear regulatory framework, the new legislation on f-gases should take into account ongoing developments in the restriction dossier of **Per- and polyfluoroalkyl substances (PFAS) under REACH**, which will most likely only be finalised by 2025 and applicable by 2027.
- In general, **air-to-air heat pumps (a.k.a. air-conditioners) and hydronic heat pumps should not fall into the same category**, as use applications and functionalities are different. We suggest to introduce a differentiation, to facilitate a technically sound outcome, while maximising benefits for environment, users and industry/investment security.

Our suggestions with regard to **hydronic heat pumps** can be summarised as follows:

- Support to the Commission's proposal on the phase-down of F-gases, as it gives a clear signal to move the market away from F-gases with higher Global Warming Potential whilst reaching the REPowerEU targets;
- Phase out of all F-gases from 2030 in self-contained heat pumps below 70 kW placed outdoors;
- Ban of F-gases with GWP >750 from 2028, for split heat pumps and self-contained heat pumps placed indoors.

Specifically, in the latest Presidency compromise text:

- Annex IV, point (16):
    - We welcome the introduction of the **capacity limit for *'plug-in room and other self-contained air-conditioning and heat pump equipment'*** (second box), but would **recommend deleting** the **ban for *'other self-contained air-conditioning and heat pump equipment'*** (third box)
        - ➔ The ban would cover self-contained heat pumps with a higher capacity (70kW upwards) and heat pumps for process heat, for which safety conditions and measures are heterogenous and different compared to smaller heat pumps, making the transition to natural refrigerants much more challenging.
    - For self-contained heat pumps below 70kW placed outdoors, a **ban of F-gases with GWP < 150 in 2025 is too early** and should be delayed to 2030, by which it should cover all fluorinated gases. Conversely, for self-contained heat pumps below 70kW placed indoors, a ban of F-gases with GWP > 750 should be implemented by 2028.
        - ➔ 2025 means less than one year to change a large part of our members' product portfolio, which is most definitely not sufficient. Such a ban will act as a barrier to the development of heat pumps with natural refrigerants, given the need to ensure availability and supply of components and to avoid stranded investments for manufacturers at such a crucial time. Some of our members already produce heat pumps with natural refrigerants, but others are still at the development phase.
        - ➔ Furthermore, for certain products a GWP limit of 150 is unjustified as it would push manufacturers towards refrigerants which are potentially harmful for the environment and health.

- Annex IV, point (18):
    - The 12kW limit mentioned here typically applies to air-to-air heat pumps, while for hydronic split heat pumps a **capacity limit of 70 kW** like in point (16) would be **more appropriate**.
    - As a result, for the same reasons as explained below for point (16) of the same annex, a **ban for larger splits, with a capacity of more than 70kW, would be too restrictive**.
    - For split heat pumps below 70kW, a **ban in 2025-27 is too early, hence we suggest a ban of F-gases with GWP > 750 from 2028 for split heat pumps below 70 kW.**

- Annex VII on HFCs phase down:
    - We support the Commission's proposal: it gives a clear signal to phase-down higher GWP F-gases, without jeopardizing REPowerEU targets.
    - We recommend including a **requirement for the Commission to monitor and analyse the situation** in light of RePowerEU objectives, to ensure that sufficient refrigerants are available for servicing and maintenance of existing hydronic heat pumps.

You may find more details about our position on the F-Gas Regulation in the document attached.

Should you have any questions don't hesitate to ask. We would be happy to discuss this further during a meeting.

Best regards,

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EU Transparency Regist
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