(November 14, 2022)

We are a Europe-based manufacturer of refrigeration, air-conditioning or heat pump equipment or RACHP components, or an organisation representing those. We support the F-gas proposal from the EU Commission[1], including amendments of the European Parliament[2].

Our companies' business is aligned with the objectives of REPowerEU[3] and the EU Chemical Strategy for Sustainability[4].
We support the overall direction of the Commission proposal for the new EU F-gas Regulation, the amendments of the European Parliament and the work related to PFAS[5][6][7].

Wherever feasible we are committed to a full phase out of halogenated refrigerants, in particular F-gases, in line with this proposal and its amendments. This commitment will serve as an accelerator for a competitive, green and sustainable EU industry detached from halogenated substances.
Natural refrigerants[8] are a proven, reliable, energy efficient and technically mature option for almost all applications, capacities/sizes and temperatures, well available in the EU and in the countries adopting EU ambitions. This is particularly true for heat pumps.

We want to emphasise that manufacturers are already investing at large scale into R&D and production capacities for environmentally friendly equipment without F-gases and other halogenated chemicals. There is no "conflict" between a phase-down of halogenated chemicals and the objectives of REPower EU, in particular those related to heat pumps.

Also, investing in F-gases and related equipment is a waste of capital for manufacturers and end-users, given the long technical lifetime of such RACHP equipment, where a later conversion to natural refrigerants (retrofitting) is virtually impossible.

The new legal EU framework should strive to be forward-looking and ensure protection of current and future generations from unforeseen consequences of current and novel chemicals as refrigerant.
As example, the story of refrigerant R1234yf (HFO) applied today in many applications, including mobile air conditioning, must not be repeated: introduced as being environmentally friendly, it is recognized today as causing irreversible environmental damage (e.g. PFAS, TFA[9]).

In order to meet these ambitious goals, we encourage the European Commission, Members of the European Parliament and national governments to actively support the European industry on this pathway, through favourable legislation, standards, training and certification schemes for technicians, and through targeted financial incentives to support further development, demonstration and market introduction investments for equipment with natural refrigerants or refrigerant-free technologies.

…….Name …….. Function …….. Place

…… Company …….. Signature ……..… Date

(completed document to be returned to info@refrigerantsnaturally.org)

Refrigerants, Naturally!

Clean Cooling Coalition

KNVVK YOUCONLOG

STEK DUURZAAM GECERTIFICEERD

1 The proposal for a regulation of the European Parliament and of the Council on fluorinated greenhouse gases, amending Directive (EU) 2019/1937 and repealing Regulation (EU) No 517/2014 (COM(2022)0150 – C9 0142/2022 – 2022/0099(COD))

2 DRAFT REPORT on the proposal for a regulation of the European Parliament and of the Council on fluorinated greenhouse gases, amending Directive (EU) 2019/1937 and repealing Regulation (EU) No 517/2014 (COM(2022)0150 – C9 0142/2022 – 2022/0099(COD)) Committee on the Environment, Public Health and Food Safety

3 Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions REPowerEU plan. (COM/2022/230 final)

4 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions Chemicals Strategy for Sustainability Towards a Toxic-free Environment. (COM(2020) 667 final)

5 The proposal for a regulation of the European Parliament and of the Council on fluorinated greenhouse gases, amending Directive (EU) 2019/1937 and repealing Regulation (EU) No 517/2014 (COM(2022)0150 – C9 0142/2022 – 2022/0099(COD))

6 PFAS means per- and polyfluoroalkyl substances (PFASs) are a large class of thousands of synthetic chemicals that are widely used throughout society and found in the environment.

7 More information on the work the Norwegian Chemical Agency is conducting on F-gases that are PFAS can be found at this link: https://www.environmentagency.no/news/2022/the-universal-pfas-restriction-proposal-and-f-gases/

8 Natural refrigerants are naturally occurring substances that require little processing, e.g. ammonia, carbon dioxide, hydrocarbons (pentane, (iso)butane, propane, etc.), water, air. These substances occur abundantly in nature, with fully understood and accepted short and long-term environmental effects, being environmentally benign in cumulative quantities used as refrigerant. We also support systems that work without the use of refrigerants.

9 More information can be found at the following link: https://pubchem.ncbi.nlm.nih.gov/compound/Trifluoroacetic-acid