



Mrs. Bente Tranholm-Schwarz
European Commission, DG CLIMA Dir. C
Deputy Head of Unit 2
(Transport and Ozone)
Beaulieu laan 24
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Subject: EFCTC Input following the 10 September F-Gas Consultation Forum

Brussels, 24 September 2015

Dear Mrs. Tranholm-Schwarz,

The European Fluorocarbon Technical Committee appreciates the opportunity to provide comments to the presentations at the first F-Gas Consultation Forum of September 10th in Brussels.

Format

The F-Gas Regulation (art 23) establishes the role of the Forum to provide advice and expertise to the Commission in relation to the implementation of the F-Gas Regulation. We therefore propose that the Commission invites the members of the Forum to contribute to the drafting of the agenda of the meetings. Regrettably the first meeting did not provide for the opportunity to discuss the implementation of the F-Gas Regulation, in particular at Member State level.

Presentation on Topic A

While most of the attention was dedicated to the use of HFCs in Refrigeration, Air-Conditioning and Heat Pump applications, the consultant made some comments with regard to other sectors which suggest that a switch to low GWP fluids was discouraged solely on economic grounds. In particular for insulation foam, this assertion is incorrect. The performance of insulation foam is governed by standards under CEN/T88 - Thermal insulating materials and products. The amendment of the various standards takes considerable time and resources which has a significant impact on the commercialisation of new insulation products using low GWP Alternatives.



Green Public Procurement

During the discussion of the topic of Green Public Procurement (GPP), the suggestion was made that only so-called "Natural" substances should be eligible for GPP. EFCTC stresses that the purpose of the F-Gas Regulation is to promote low GWP solutions irrespective of their nature. We also note that so-called "Natural" fluids are produced in industrial installations and their overall environmental impact (GWP, LCA, POCP) should be considered in the same way as the HFOs which have been extensively assessed. Any distinction between so-called "Natural" and other Low GWP fluids under GPP rules are in our view in breach with the general EU principles of non-discrimination and proportionality.

Yours faithfully,

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