

## Consultation on reducing fluorinated greenhouse gas emissions - Further action at EU level

### Meta Informations

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### General information about you

Please, enter your name and, where relevant, the name of the organisation you represent. Please include also E-mail address for contact purposes for use only if we need clarification about your response. Alain D'HAESE FEA (European Aerosol Federation) e-mail: alain.dhaese@aerosol.org	
I am replying as / on behalf of:	organised stakeholders
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Please specify the category that most closely describe your organization	other type of companies/ professional association
Please indicate your country or, where relevant, the geographical area you represent	EU wide
Please select the option best describing the use category relevant for you, if any (max 3 choices)	aerosols (other than medical)
We may publish your response, together with your identity, on the Commission website, where it will be publicly accessible. Though if you request it, publication will be anonymous. How would you prefer your contribution to be published, if at all?	under the name indicated - I consent to publication of all information in my contribution and declare that none of it is under copyright restrictions that prevent publication.

### Questions on choice of policy action

The European Commission is looking to set out a plan to reduce EU emissions by 80-95% by 2050. In this context, how do you judge current EU policies on greenhouse gas emissions from F-gases (e.g. the F-Gas Regulation on certain F-gases and the Directive on mobile air-conditioning)?	fully sufficient if properly implemented
What are the main obstacles to switching to alternative technologies with lower impact on the climate (i.e. fluids with low global warming potentials or other non-in-kind technologies) in the applications currently relying upon F-gases? (max 3 choices)	other
Please specify A 1:1 shift from HFC-134a to HFO-1234ze has been proposed but is by no means an easy exercise. The aerosol industry has still limited experience in using HFO-1234ze and more specifically concerning stability of formulations, compatibility with the coatings of aerosol containers, but also flammability. HFO-1234ze is and will be manufactured by a single company in a monopoly situation and developing new production capacities is always	

an uncertain exercise. FEA considers it premature to assess what available quantities and what the market penetration rates will be. For these reasons, FEA advises a prudent approach in possibly establishing a new ban of HFC use in technical aerosols. While there may be no problem in practice the supply situation 10 or 20 years from now is not clear and industry should not be placed in such a potentially difficult competitive position by legislation. Further HFC ban (if any) by 2020 would be too risky for the aerosol industry due to current uncertainties.

In the absence of global action to phase-down HFCs, which options would you consider the most appropriate, at EU level, to contribute to the established targets for reducing greenhouse gas emissions? (max. 3 choices)	establishing maximum, gradually declining limits to the quantity of HFCs placed on the EU market (phase down) expressed in terms of CO2 equivalent encouraging voluntary agreements for specific sectors where replacement is technically feasible and cost-effective
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If a global agreement to phase-down HFCs is eventually concluded, which policy options (if any) would be the most appropriate to complement, at EU level, the establishment of maximum, gradually declining, limits for the quantity of HFCs placed on the EU market expressed in terms of CO2 equivalent. (max 3 choices)	encouraging voluntary agreements for specific sectors where replacement is technically feasible and cost-effective
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If you have a specific suggestion on how to reduce leaks and improve recovery of F-gases from products through stricter and/or broader application of the type of measures already present in the F-gas Regulation, please briefly specify below:

No suggestion.

If you have any specific suggestions of technical adjustments to the current F-gas Regulation, e.g. to clarify its provisions, please briefly specify below:

Definition of aerosol dispensers might be included to clearly differentiate these products from “non-refillable containers”. Aerosol dispensers are already defined in the Community Acquis in the Aerosol Dispensers Directive 75/324/EEC: any non-reusable container made of metal, glass or plastic and containing a gas compressed, liquefied or dissolved under pressure, with or without a liquid, paste or powder, and fitted with a release device allowing the contents to be ejected as solid or liquid particles in suspension in a gas, as a foam, paste or powder or in a liquid state. FEA supports the inclusion of HFO-1234ze with its GWP value in the Annex I for the purpose of providing an undisputed legal base when aerosol products use such F-gases for the calculation of the total GWP of the preparation (which only applies to the propellant, and not the total products).

## Questions on potential impacts

Who do you think will be most exposed to any negative impacts of a strengthened approach to F-gas emissions? (max 2 choices)	Commercial or industrial users of relevant products or equipment Individuals using relevant products or equipment
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Who do you think will benefit most from a strengthened approach to F-gas emissions? (max 2 choices)	
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What type of application (if any) do you think will be most positively affected by a phase-down of HFCs? (max 3 choices)	aerosols (other than medical)
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What type of application (if any) do you think will be most negatively affected by a phase-down of HFCs? (max 3 choices)	
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Which policy option do you expect to impose the greatest administrative burden?	introducing additional prohibitions on use and marketing of certain equipment and products where cost-effective alternatives exist (e.g. a ban on application X containing hydrofluorocarbons as of date Y)
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How do you think a shift towards alternatives having a lower or no global warming potential will affect the competitiveness and market shares of European businesses (or the business you represent)?	Harmful for competitiveness (specify below)
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Please, specify your expectations regarding the order of magnitude, e.g. expected percentage increase in costs

HFO-1234ze is and will be manufactured by a single company in a monopoly situation (see also reply to B.3). FEA considers it premature to assess what and by when cost of supply might be affordable for certain aerosol applications and as a consequence what the market penetration rates might be in the future.

## Additional comments

Please include any additional comments you might have (max. 5000 characters) or upload a document (max 1 document, if possible in MS Word, pdf or rich text format). In exceptional cases and only if you experience problems with this questionnaire, you can also send us documents by email ([CLIMA-Fgas@ec.europa.eu](mailto:CLIMA-Fgas@ec.europa.eu)).

FEA supports a market-based phase-down approach at F-gases manufacturers/importers level, rather than additional prohibitions on use and marketing. Certain aerosols (other than medical) will need to continue using HFC-134a due to their specific properties or conditions of use. However it would be burdensome to correctly define exemptions in the frame of the F-gases Regulation. FEA will continue to release its updated voluntary FEA Code of Practice on HFC Use in Aerosols to monitor use of HFCs in the aerosol sector and to demonstrate commitment and achievements. Based on the FEA survey, the total consumption of HFCs for general aerosols represents 3.74 Mt CO<sub>2</sub> eq. accounting for less than 0.1% of total EU-27 greenhouse gas emissions in 2009. In contrast to the trend for emissions of HFCs from all sources, the total consumption of HFCs in general aerosols decreased by 34% between 2002 and 2009. Certain types of aerosol products use HFC-134a because it is non flammable, a requirement for these products due to their conditions of use. The expected considerable increase in formulating and procurement costs may lead to products using flammable propellants appearing in the market and may impact on the safety of such products in use.