



The Voice of European Air-Conditioning, Refrigeration and Heat Pumps Contractors

REACH restriction proposal of all per- and polyfluoroalkyl substances

AREA POSITION

December 2020

AREA represents the European refrigeration, air conditioning and heat pump (RACHP) contracting sector. We refer to the call for evidence by Germany, the Netherlands, Norway, Sweden and Denmark related to a REACH restriction proposal to limit the risks to the environment and human health from the manufacture and use of all per- and polyfluoroalkyl substances (PFAS).

AREA would like to give its full support to the comments made by EPEE, and more specifically:

1- PFAS have a wide range of very different properties

⇒ Including F-Gases in a PFAS REACH restriction proposal could have unintended consequences.

2- F-gases are already successfully addressed by the F-gas Regulation

⇒ Restricting F-Gases via REACH would lead to overlaps and jeopardise the F-Gas Regulation – one of the most successful climate regulations in the EU.

3- Lower GWP HFCs and HFOs are essential to achieve the Kigali Amendment to the Montreal Protocol

⇒ Restricting HFCs and HFOs in Europe would create a climate of uncertainty and jeopardise the major climate benefits of the Kigali Amendment to the Montreal Protocol.

4- Heating and Cooling are essential to achieve carbon neutrality by 2050

⇒ Lower Global Warming Potential (GWP) HFCs and HFOs are essential to decarbonise the heating and cooling sector in a safe, reliable and cost-efficient way.

About AREA

AREA is the European association of refrigeration, air conditioning and heat pump (RACHP) contractors. Established in 1989, AREA voices the interests of 25 national associations from 21 countries representing 13,000 companies employing 110,000 people and with an annual turnover approaching € 23 billion.