

## **PU Europe feedback consultation on the review of EU rules on fluorinated greenhouse gases**

PU Europe is the European Federation of manufacturers of thermal insulation products, from construction products manufactured in factories to in-situ formed PU foam, based in the European Union and the UK. Our members provide long lasting products and solutions (over 50 years for most of them) that are essential to cut energy use and therefore fight climate change.

PU Europe generally welcomes the proposal and would like to comment on its scope and the mandatory recovery and destruction of insulation waste containing F Gases, both topics being interlinked.

The aim of this regulation being about preventing greenhouse gases emissions, we believe that a differentiated treatment shall apply to substances listed under section 1 “Unsaturated hydro(chloro)fluorocarbons” of annex II owing to their (very)low GWP. It is a fact that alternatives to those substances (flammable hydrocarbons included) might exhibit a higher GWP than the substances they substitute. This is particularly important in the context of the article 8 paragraphs 4 and 5 “recovery and destruction”. While the whole waste and construction sector has embarked on the immense task of developing a proper infrastructure in place all over Europe to deal with construction and demolition waste (C&D W), this will take time and the developments are different depending on the countries/regions. If an obligation to recover foam containing a low GWP blowing agent was imposed bluntly in a geographic area where no proper infrastructure exist for C & D waste, the environmental benefit of such obligation would most probably be negative (assuming more intense human activities to segregate the waste and longer distances between the various stakeholders). We would therefore very much like to see a reversal of the proposal in the sense that an environmental cost benefit analysis shall prove that it is worth recovering those gases listed under annex II, section 1. With regards to the entry into force by January 2024 of this obligation, this seems overambitious when looking at the number changes which will need to be made to national frameworks and for informing all the stakeholders.

PU Europe members are committed to help the European Union reach its medium to long-term objectives of a climate neutral, resilient and fair Europe. We believe that our durable products are critical in curbing energy consumption, and hence CO<sub>2</sub> emissions, during the use phase of buildings, from commercial, industrial, public to dwellings. It is also worth highlighting that for the fraction of our sector relying on F Gases, those substances have almost completely being replaced by H(C)FO-1336mzz, -1234ze& -1233zd listed under annex II section 1, well in advance of the 2023 deadline set by the existing F Gas Regulation. Those former substances have 99% lower Global Warming Potential (GWP) vs. their predecessors and also exhibit a better thermal conductivity.

Best regards

Arnaud Duvielguerbigny

Secretary General

*PU Europe is the European voice of the polyurethane (PUR / PIR) insulation industry. The 110 manufacturing sites and more than 20,000 direct jobs in the PU rigid foam sector contribute to tackling the carbon footprint of the buildings stock responsible for around 36% of the CO<sub>2</sub> emissions of the European Union (more information about us via [www.pu-europe.eu](http://www.pu-europe.eu) and lobbying transparency register ID number 27993486325-38).*