

PU Europe submission to the public 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 manufacturers in factories to in-situ formed PU foam).

The superior performance of our insulation products is due to the presence of a blowing agent trapped in a closed cell polymeric matrix. When produced in factories, the most commonly used blowing agent is pentane (hydrocarbon), either as a pure isomer or as mixes of its isomers. In certain discontinuous production lines and for in-situ foam formulations, the blowing agent must not be flammable under normal application conditions and HFC-365mfc or HFC-245fa have been employed. In advance of the F Gas regulation timeline (2023 as the cutoff date set in annex I for their usage in polyurethane foam), those substances are now being replaced by HFO-1336mzz-Z and HCFO-1233zd-E listed under annex II. Those former substances have 99% lower Global Warming Potential (GWP) vs. their predecessors and also exhibit a better thermal conductivity.

PU Europe would like to raise the below comments to this public consultation:

- The focus of the legislators at this point in time should be on the implementation of the current F Gas Regulation;
- Any future F Gas legislation shall keep a strong link with the current text to ensure continuity for the industry;
- Convergence with the Kigali Accord might respect the spirit of the current F Gas regulation;
- Alternatives to HFCs, i.e. HFO/HCFO listed under annex II, should be protected;
- The review of this regulation shall lead to greater consistency between various European Commission policies notably the ones addressing the fight against climate change (the F Gas regulation and the Renovation Wave with its objectives to decarbonize the building stock) and REACH (notably the possible PFAS actions).

PU Europe sincerely hope that the above comments will be taken into consideration and would like to recall the support of its members to the EU long term carbon neutrality goal. Our products are critical in curbing energy consumption, and hence CO₂ emissions, during the use phase of buildings, from commercial, industrial, public to dwellings.

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 CO₂ emissions of the European Union (more information about us via www.pu-europe.eu and lobbying transparency register ID number 27993486325-38).