

INDUSTRY PETITION

**Subject: Urgent Call for Comprehensive PFAS Restrictions in the HVAC&R Sector:
A Healthier, Competitive, Innovative EU**

Brussels, February 25, 2025

Att. of Risk Assessment Committee members of ECHA

Att. of Socio-Economic Analysis Committee members of ECHA

Att. of Member States Committee members of ECHA

We, the undersigned businesses in the clean cooling and heating sector, urge you to swiftly enact strict and comprehensive restrictions on per- and polyfluoroalkyl substances (PFAS) specifically within the European HVAC&R (Heating, Ventilation, Air Conditioning, and Refrigeration) sector. Phasing out these harmful "forever chemicals" is not only vital for protecting public health and the environment but also presents a significant economic opportunity for the EU.

PFAS-Free Innovation: A Competitive Advantage for the EU

The HVAC&R sector is already demonstrating that a PFAS-free future is not only possible but also advantageous. Innovative alternatives to fluorinated gases are readily available and being implemented across a range of applications, from heat pumps to data center cooling, from mobile air conditioning to industrial and commercial refrigeration and district heating. Natural refrigerants, such as R744 (CO₂), R290 (Propane) and R717 (Ammonia) offer commercially viable and scalable PFAS-free alternatives to HFCs and HFOs, most of which are PFAS that degrade into trifluoroacetic acid (TFA), a persistent and mobile PFAS contaminating drinking water and most food we eat.

Natural refrigerants based alternatives in the HVAC&R sector present the following benefits for the EU:

- ✓ Job creation and market growth: the transition to PFAS-free technologies will fuel innovation and create new jobs across various clean heating and cooling sub-sectors, including manufacturing, installation, research and development, and training and education. This growth can be further stimulated by creating harmonized standards for permitting pertaining to the installation of flammable refrigerants, easing the bureaucratic burden for SMEs from local authorities.
- ✓ Global leadership in clean technology: by proactively embracing PFAS-free solutions, the EU can establish itself as a global leader in the clean technology market, attracting investment and boosting exports.

- ✓ Enhanced EU competitiveness: promoting the development and adoption of PFAS-free solutions will give EU businesses a competitive edge in the global marketplace.
- ✓ Reduced healthcare costs: PFAS exposure has been linked to various health problems, including immune deficiency, liver cancer, and thyroid abnormalities. A PFAS ban can reduce healthcare costs associated with these health issues.

Estimated socio-economic impact specific to the HVAC&R sector:

- ✓ Market growth and job creation: the European market for PFAS-free HVAC&R equipment is poised for substantial expansion, driven by increasing demand for sustainable and environmentally friendly solutions. Our own conservative estimates suggest a potential for 50,000 – 75,000 net new jobs in the EU HVAC&R sector by 2030 due to the shift towards PFAS-free technologies.
- ✓ Reduced costs: transitioning to natural refrigerants can lead to significant cost savings for businesses due to lower refrigerant prices, reduced maintenance costs, and improved energy efficiency. Additionally, it reduces the EU's reliance on imported HFOs/HFCs, which are currently 80% imported and subject to licensing fees and royalties, further increasing costs for businesses.

Banning TFA: A Critical Step

A key component of comprehensive PFAS restriction is banning the manufacturing, use, and placing on the market of substances, such as HFOs, that degrade into trifluoroacetic acid (TFA), a persistent PFAS that contaminates drinking water and has been found in humans.

A Call for Decisive Action

We urge you to seize this opportunity and implement a comprehensive PFAS restriction within the HVAC&R sector with minimal derogations and transition times. This bold action will protect our planet and its people while unlocking significant economic benefits for the EU.

Sincerely,



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