

## EFCTC CEOs write to Automobile CEOs to request their assistance in the fight against Illegal HFC Trade

In response to rapid emergence of illegal traffic of Hydrofluorocarbons (HFCs- or refrigerants) across the EU, and in order to assist the EU and Member States, the European Fluorocarbons Technical Committee (EFCTC) has launched a multi-level programme to fight against this illegal trade to raise awareness on this problem. As the latest stage, the CEOs and senior Executives of EFCTC member companies have written to the CEOs of the major car companies in the European Union requesting them to make their dealerships aware of the situation regarding the illegal import of HFC-134a which is used extensively for the servicing of the existing automobile fleet.

In the letter, the EFCTC CEOs ask their peers in the Automobile companies that “through your contacts with these companies (the dealerships), you make them aware of the situation regarding the illegal imports of HFC-134a and that they are directed to seek assurance/guarantee that their suppliers can demonstrate that their HFC-134a is legally sourced from a holder of an annual quota.” The phase-down of HFCs has shown evidence that illegal imports of HFCs (in particular HFC-134a which is used in European automotive industry air-conditioning system) are perceptibly increasing and, as a consequence, are becoming a threat for implementation of the EU F-Gas Regulation and for the environment protection.

The letter also notes that sales of HFC-134a in disposable cylinders, which are banned in the EU, is increasing and stresses that the use of illegally imported product could cause a health and safety hazard. The EFCTC CEOs state, “there is no guarantee that the cylinders of drums illegally imported actually contain the correct products - and may actually contain more hazardous or flammable products posing significant risks for their users as well as impurities that could damage the HVAC system in cars.”

The letter draws attention to the EFCTC “Action Line” that permits any individual to report alleged suspect HFC offerings confidentially to a trusted and independent contractor using a webform (in any language). The results of this programme will create a more detailed picture of the illegal HFCs supply chain, which can be then shared by the independent contractor with the EU/national authorities, for enforcement. The Automobile CEOs are requested to share the link with their dealers: <https://efctc.integrityline.org>.

**Subject: Illegal imports of HFCs**

We are writing to you to request your assistance on an important matter that is impacting the protection of the climate through measures taken in the European Union. We represent the CEOs of the five major suppliers of fluorocarbon refrigerants and air-conditioning gases in the EU.

The European Union identified the need and took action through the F-gas Regulation No.842/2006<sup>1</sup> and the subsequent Regulation No.517/2014<sup>2</sup> to phase-down the use of high global warming potential fluorinated gases, the Hydrofluorocarbons (HFCs). In its most recent step, from 1 January 2018 to end-2020, a reduction of 37% is mandated within the EU for bulk HFCs as well as for imported pre-charged equipment containing HFCs.

The phase-down of HFCs has shown evidence that illegal imports of HFCs (in particular HFC-134a which is used in European automotive industry air-conditioning system) are perceptibly increasing and, as a consequence, becoming a threat for implementation of the EU F-Gas Regulation and for the environment protection.

Although completely illegal, sales in disposable cylinders are also rising. As well as being illegal to import and sell HFCs without a valid quota associated to an individual company, such activity is also potentially a health and safety hazard, as there is no guarantee that the cylinders of drums illegally imported actually contain the correct products - and may actually contain more hazardous or flammable products posing significant risks for their users as well as impurities that could damage the HVAC system in cars.

As of today, the majority of HFC-134a used in the automobile industry in the European Union is for the servicing of the existing automobile fleet. As an automobile supplier, a large proportion of the fleet is serviced through dealerships that are attached to your companies.

We would ask you that, through your contacts with these companies, that you make them aware of the situation regarding the illegal imports of HFC-134a and that they are directed to seek assurance/guarantee that their suppliers can demonstrate that their HFC-134a is legally sourced from a holder of an annual quota.

Also, The European Fluorocarbon Technical Committee (EFCTC)<sup>3</sup> of whom we are all members, has launched a programme to fight against this illegal trade. An "Action Line" will permit any individual to report alleged suspect HFC offerings confidentially to a trusted and independent contractor using a webform (in any language). The results of this program will create a more detailed picture of the illegal HFCs supply chain, which can be then shared by the independent contractor with the EU/national authorities, for enforcement. We would be grateful if you would also share this link with your dealers: <https://efctc.integrityline.org>.

We hope that we can rely on your support in tackling this serious issue, which ultimately also affects the quality of the refrigerant serviced in your cars. Should you require any further information please contact the EFCTC Secretariat Angelica Candido, email: [anc@cefic.be](mailto:anc@cefic.be).

Sincerely,



Thierry Le Hénaff  
Chairman and CEO Arkema

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ARKEMA



President, Fluor and Compounds

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The European FluoroCarbons Technical Committee is a Cefic Sector Group that monitors legislation related to HFCs (hydrofluorocarbons), and HFOs (hydrofluoro-olefins) in the EU and at global level. Fluorocarbons are used as feedstock, as refrigerants, as solvents and as blowing agents for insulation plastic foams.

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