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HFCs In Vehicle Air Conditioning

I am writing to you to express the concern of the Multi-sectoral Initiative on Potent Industrial Greenhouse Gases (MIPIGGs www.mipiggs.org) with your policy on HFCs in mobile air conditioning, as stated in relation to the draft European Union Regulation on f-gases.

We are alarmed that you appear to have reversed the previous presumption against the use of HFCs, powerful greenhouse gases, which was clearly stated by your predecessor Michael Meacher, supported by John Prescott, and indeed is still the policy stated in the UK Climate Change Programme¹.

In 2000 Michael Meacher said² (my emphasis)

*The Government's draft climate change programme includes a new policy statement on HFCs because they are powerful greenhouse gases and are included in the basket of gases controlled under the Kyoto Protocol. We recognise that **HFCs are necessary replacements for ozone-depleting substances in some applications**, but we are concerned that emissions **from these sources** are forecast to grow strongly in the near future. This trend is unsustainable in the longer term and action needs to be taken to limit the projected growth.*

*Our position would allow HFCs to continue to be used **where they are necessary**, but we recognise that the successful phase out of ozone-depleting substances is being achieved with a range of technologies. We believe that continued technological developments will mean that HFCs may eventually be able to be replaced in applications where they are currently necessary. We therefore believe it is right to give a clear signal to industry and users to look closely at these alternatives and to select those that are more environmentally acceptable where they do exist. Of course safety, technical feasibility and cost effectiveness should be taken into account before investment decisions are taken.*

This clearly rules out use of HFCs where they are not necessary as replacements for ozone depleting substances.

In 2000 John Prescott, Deputy Prime Minister launched the UK's draft action plan on implementing the Kyoto Protocol and said it included "a clear signal to industry that hydrofluorocarbons (HFCs) have no long-term future"³.

That is not the signal being sent now, if you support use of HFCs in car air-conditioning, instead of an early ban.

The 2001 UK Climate Change Programme states (Annex F):

*the Government concluded voluntary agreements with the five key sectors that use HFCs as alternatives to ozone-depleting substances –refrigeration and air conditioning, mobile air conditioning, foams, fire protection and aerosols. These agreements set out **strategies to minimise emissions but recognised the need not to take action which would undermine efforts being taken to phase out the use of ozone-depleting substances***

This repeats the logic of what Mr Meacher stated in the House'. It clearly puts 'necessary' use of HFCs in the context of a phase-out of CFCs or other ODS, ozone-depleting substances.

Yet in the case of car air-conditioning, there are no 'efforts being taken to phase out the use of ozone-depleting substances'. You acknowledged as much on 14 January 2004 when you noted: "modern car systems do not have CFCs in them" (European Standing Committee A debate). Nor, in the UK and Europe, did older cars.

Until recently car air-conditioning was almost unheard of in Europe. Now it is growing rapidly and f-gas industry sources put HFC growth at 3 – 6% a year. As of 1997 only 9% of new cars sold in Europe had air-conditioning yet it was forecast that 90% would do so by 2001. Unlike in the United States, this is not a CFC or ODS replacement issue at all, but an entirely *new* use of HFCs so they ought not to be used.

Nevertheless, in the debate of 14 January on the draft EU regulation on f-gases, you agreed with arguments of the car industry, and supported use of HFCs in car air-conditioning rather than a ban, on grounds of cost.

In a letter to us on 26 January your Chief Scientific Adviser Sir David King wrote:

"the Government's general position on HFCs remains the same as stated in UK Climate Change Programme. That being HFCs should be used only where other safe, technically feasible, cost-effective and more environmentally acceptable alternatives do not exist; that HFCs are not sustainable in the long term; and that continued technological developments will mean that HFCs may eventually be able to be replaced in the applications where used".

No doubt Sir David's points were drafted in conjunction with your officials and you are in full agreement with them. This 'general' position makes no mention of a phase out of ODS. Does this mean that the criterion of need in relation to phase out of ODS has been dropped? Or that it remains but is not stated?

Either policy has changed or supporting HFCs in car air-conditioning contradicts it.

For there to have been no change in policy and for HFCs in car air-conditioning to be consistent with it, one would need to argue that HFCs can be used as 'an alternative' to CFC uses which have never existed, rather than a replacement for actual uses. This would make a Kafka-esque mockery of environmental policy and would permit almost any HFC uses which industry can dream up. Is this your intention?

For Government to now sanction large scale use of a powerful greenhouse gas, HFCs, just as a consumer extra, permits an environmental abuse as feckless as when official policy backed CFCs aerosols. It simply puts car sale incentives over the environment.

The policy you proposed on 14 January ('enhanced' HFC systems) would sanction a hugely increased volume of HFCs, on the speculative hope that improved car air-conditioning systems will prevent this escaping to the atmosphere. We have a fridge-mountain of precedents with CFCs and now HFCs, to show this is not the case. F-gases consistently reach the atmosphere where they cause environmental havoc. Even modern car systems lose their entire charge to the atmosphere in 5 - 10 years⁴. Loss of 10% or 80 grammes of HFC 134a is equivalent to driving the average European car 403 miles (650km), the distance from London to Edinburgh.

The latest evidence of mounting HFC pollution comes from Norway⁵, where in 2002 atmospheric levels of HFC 134a and 125 over Svalbard (Spitsbergen) were 20% higher than in 2001.

We urge you to recognize that allowing HFC use in mobile air-conditioning, rather than a ban

- is a clear reversal of the presumption contained in both Mr Meacher's statement and the Climate Change Programme itself, both of which argue for HFC use only as an alternative to ODS or CFCs: ie it abandons the criterion of need based on phasing out ODS
- ignores practical experience which is that systems leak, and containment and recovery fail

For you to now pursue a strategy of emission containment, which permits the use of HFCs in new applications, is a U-turn on the previous policy of avoiding HFC use and substituting other technologies.

We urge you to revert to the previous position of promoting alternative technologies and practices that avoid the use of HFCs and other f-gases altogether.

We note that your Chief Scientific Adviser recently described the threat of global warming as worse than terrorism, and that the Prime Minister recently described climate change as the greatest long-term threat to humanity.

It will do nothing for public trust in your Government if its actions do not match its words. You will know that major new Government construction projects such as GCHQ and the Home Office are using HFCs despite supposed official policy to avoid them. If your Government now caves in to pressure from the US-dominated car industry and US-dominated f-gas industry, and backs HFC 134a in mobile air-conditioning, it will be another mismatch between UK Government rhetoric on climate change, and actual action.

I hope you can demonstrate to us that this is not the case by dropping support for 'enhanced', or any use of HFCs in mobile air-conditioning, and calling on your European partners for a ban on HFCs at the earliest date, together with a fast-track programme to commercialise the alternative technologies (eg CO₂ based) demonstrated by Toyota and others.

You have praised the Government advertising campaign "doing your bit" which aimed for an 'increase in awareness about the link between individual car and energy use and climate change' as "very useful". It should now be extended to avoiding HFCs in cars and other consumer goods.

A vigorous Government public awareness information campaign should advise drivers to avoid buying cars with HFC air conditioning, and to demand alternatives. The example of greenfreeze, praised by the Prime Minister⁶, shows the capacity of industry to rapidly commercialise such technologies. As former Environment Secretary John Gummer said in the House on 27 January, "if it [the motor industry] can suggest a ban in 2012, we know that it can do it a darn sight earlier than that".

We believe that where any HFCs are used, it should be mandatory for a clear warning label should be fixed at a prominent place on the vehicle. When asked by MP Sue Doughty⁷ on 14 January “Are there any plans to ensure that it is common knowledge that chemicals in the air-conditioning of cars are harmful to the environment?” you responded “that is a reasonable point ... will give it some thought”. Have you now given it thought, and if so, what is your conclusion?

Above all, the UK and other Governments must adopt an aggressive substitution policy and start seeing HFCs as a problem in the same way that it saw CFCs as a problem, otherwise we will end up with another f-gas atmospheric disaster.

I commend these points to you and look forward to hearing your response to them, and to receiving answers to the above questions. As this is a matter of considerable public interest I am sure you will understand us giving this letter a wider circulation.

Yours sincerely

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¹ Department for Environment, Food & Rural Affairs *Climate Change UK Programme Annexe F*

² Hansard, 26 Jun 2000 : Column: 370W. Hansard, 26 Jun 2000 : Column: 370W. answer to Mr. Brady.

³ UK set to slash greenhouse gases, Thurs, 9 March, 2000, http://news.bbc.co.uk/1/hi/english/sci/tech/newsid_671000/671677.stm

⁴ Keeping Cool without Warming The Planet – Cutting HFCs, PFCs and SF₆ Jason Anderson, (p 6) Climate Action Network, Brussels, www.climnet.org citing Pedersen

⁵ ENDS Daily 6 February 2004

⁶ UK Prime Minister's speech to CBI/Green Alliance - 24 October 2000

⁷<http://www.parliament.the-stationery-office.co.uk/pa/cm200304/cmstand/euroa/st040114/40114s01.htm> Controls on Fluorinated Greenhouse Gases European Standing Committee A
Wednesday 14 January 2004