

ENGINEERING
TOMORROW



Refrigerant options **now** and in the **future**

A white paper on the global trends within refrigerants in air conditioning and refrigeration seen from a Danfoss perspective.
Updated August 2025.

R744

R454B

R290

R1234ze

Policy Statement

Danfoss encourages the sustainable development and use of low-GWP refrigerants to minimize global warming while helping to ensure the continued green transition of energy systems and food chains from production to market along with the future viability of our industry.

We will enable our customers to achieve these refrigerant goals while continuing to enhance the energy efficiency of refrigeration and air-conditioning equipment.

Danfoss will proactively develop products for low-GWP refrigerants, both natural and synthetic, to fulfill customers' needs for practical and safe solutions without compromising energy efficiency.

Danfoss will lead and be recognized in the development of natural refrigerant solutions wherever possible.

Danfoss will develop and support products for low-GWP synthetic refrigerants, particularly for those applications where natural refrigerant solutions are not yet practical or economically feasible.



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Executive Summary

Danfoss, a world leader in the supply of compressors and controls, has one of the most extensive and complete product ranges in the HVAC/R industry. Our products are found in numerous business areas, such as food retail, commercial and industrial refrigeration, air conditioning, products for wholesale refrigeration, and automation in specific industrial sectors. More than 90 years of experience has put Danfoss at the forefront in developing products using refrigerants and in evaluating the viability of new refrigerants as they are introduced. This paper contains a summarized look at our experience and knowledge, describing the background, trends, and drivers that frame the scenarios for present and future refrigerant selection.

The history of refrigerants is long and cyclical. We predict that vapor-compression systems will remain the primary and most cost efficient technology for the foreseeable future and anticipate that refrigerant consumption will increase dramatically with the growing demand from the green energy transition and emerging economies. Pairing

systems and technologies with the most suitable refrigerants is a decision that will impact users for years to come. Most experts point to safety, affordability, and environmental friendliness as the most important factors to consider when building a system. But a balance of these factors can't be found in just one refrigerant for all applications.

Selecting new alternatives implies investments, costs, and educational burdens, but we believe that if these selections are made correctly, and with an innovative approach, they can open doors to new opportunities. By developing new safe technologies and procedures for handling systems, we know that we will continue to move towards much lower GWP refrigerants than are currently in use today. We foresee a decade of intensive product and system development as well as a challenging market adaptation which will be dependent on the specific regions and emerging societal needs. However, the global agreement on an orderly phase-down of high-GWP refrigerants will ensure that we are heading in the right direction.

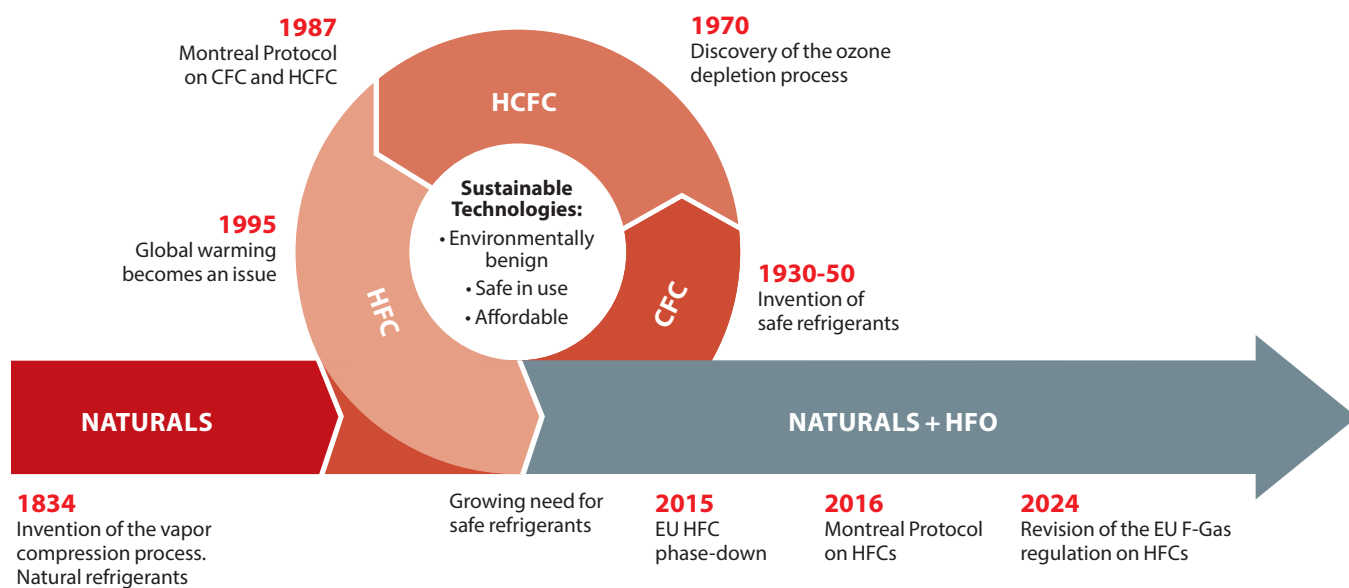


Figure 1: The historical cycle of refrigerants.
More info about the history in Appendix 3.

Phase-down regimes and regulations

Regulations, both national and international, have been some of the most important drivers for spurring investment in new technology. Figure 2 charts an overview of the main HFC phase-downs that have already been imposed on the industry. The measures for reducing HFC consumption are mostly forced by regulation, and they all mean to place limits for consumption within the market. Specific guidance measures on market development—like GWP limits for certain applications—often generate challenges for market readiness and applicable safety standards. When new regulations are made, they are intended to encompass and balance the guidance measures and industry concerns. This is illustrated in Figure 3.

HCFCs—particularly R22—are already phased out in all non-developing countries. Developing countries began phasing out HCFCs in 2015 and will continue until 2030. It is important to note that the HCFC R22 can be used in many different applications, which makes the phase-out a challenge as no single non-flammable low-GWP refrigerant can replace it. Appendix 1, table 2 shows the HCFC phase-down steps.

In October 2016, the global HFC phase-down steps were agreed and became part of the Montreal Protocol, also called the Kigali Amendment—which came into force on January 1, 2019. For countries that ratified the Amendment after that date, the Amendment will enter into force 90 days after the ratification. In 2016, leading climate foundations formed the largest-ever fund for action on efficient, climate-friendly cooling.

Besides the phase-down and phase-out mechanisms discussed above, many governments are applying measures for reducing high-GWP refrigerant consumption, such as GWP-weighted taxes. To date, Spain, Denmark, Norway, and Sweden have imposed taxes on HFCs. Additionally, national incentives in the form of subsidies for low-GWP refrigerants are currently being used in countries such as Germany..

Appendix 1 contains a detailed overview of the main regulations, treaties and agreements, including the Montreal Protocol, the EU F-gas regulation, and the US SNAP regulation, including the California HFC rules.

HFC consumption phase-down for art. 5 and non-art. 5 countries

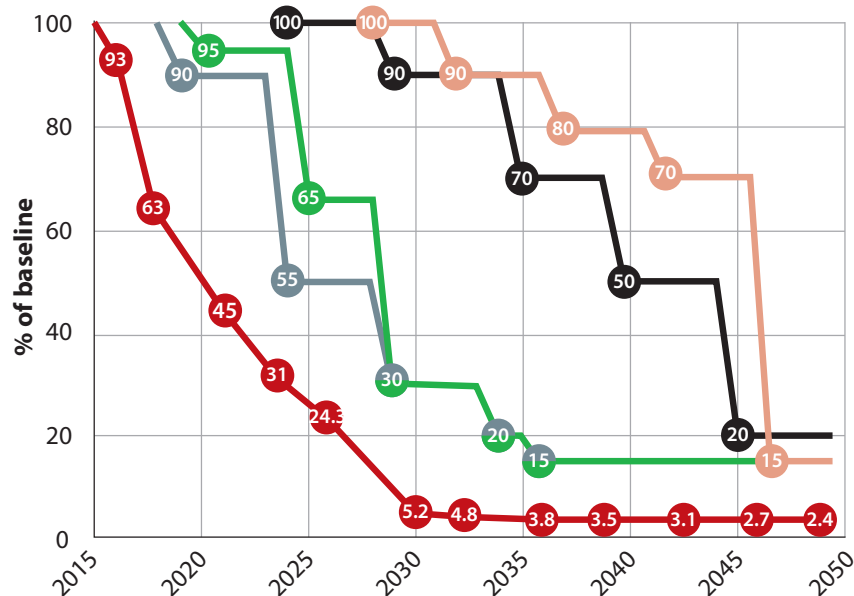


Figure 2: Refrigerant phase-down (MP and EU).
See more details in Appendix 1.



Figure 3: Dynamic between the legislative framework and industry solutions.

Europe: Potential Restrictions on PFAS

In February 2023, Germany, the Netherlands, Norway, Sweden and Denmark submitted a joint REACH (Registration, Evaluation, Authorization and Restriction of Chemicals) proposal restricting the use of Per- and Polyfluoroalkyl substances –PFAS. PFAS are a complex group of more than 12,000 chemicals that have been linked to environmental contamination and negative health effects in humans. For example, firefighting foams based on PFAS substances have been reported as the source for several severe cases with direct exposure to the environment. In the EU, the majority of F-gases, as well as their potential atmospheric breakdown product called TFA (Trifluoroacetic acid), fall under the definition of PFAS. Some of the PFAS-classified HFOs have very small TFA yields, while others have 100 % TFA formation in their atmospheric breakdown. The TFA breakdown yield depends on the specific chemical composition of the refrigerant, is highly complex and involves various atmospheric parameters. However, there are exceptions, such as R32. The PFAS-classified F-gases all contain a CF3 part and all marketed F-gases below GWP 150 are considered PFAS.

With consistent press coverage and debate around PFAS, applying a scientific and evidence-based approach is critical to evaluating the topic. Several reported field measurements of rainwater content show TFA concentrations which are approaching threshold values for drinking water. However, F-gases are not the only source of TFA concentrations. Pesticides and breakdown residuals from burning processes in incineration plants also account for TFA in rainwater. And most reports do not provide a breakdown of TFA concentration by source. The report from the Environmental Effects of Stratospheric Ozone Depletion, UV Radiation, and Interactions with Climate Change; UNEP 2022 Assessment Report of the Environmental Effects Assessment Panel, states that TFA concentrations from refrigerants are of low

concern; however the report also emphasizes that further investigation is necessary. Authorities are continually evaluating TFA to determine the influence it has on people's long-term health [EU commission communication]. It is an extremely complex topic, both from a physical and chemical point of view, and thus requires a thorough analysis.

Multiple mitigating measures are in place

First, HFCs are effectively being phased down under the F-gas regulation. However, low GWP HFO's are considered replacement options, which can lead to increased TFA yields if leaked into the atmosphere. Reducing leak rates and ensuring the ability to recover refrigerant is of utmost importance. In addition to quota allocations, there are specific bans on applications (see Figure 15). Two high consuming applications are targeted to have a full F-gas ban in 2032 (monoblock AC/HP below 12 kW) and 2035 (Split AC/HP < 12 kW). There are also several mechanisms in the F-gas regulation that will target recovery, recycling and reclaiming of refrigerants. The aim is to be able to reduce emissions from any refrigerant used. This will also be a major factor in improving a system's energy efficiency throughout its lifetime.

Regulators are still evaluating the proposed PFAS restriction for risk and socio-economic impact and its entry into force has been delayed several times due to the area's complexity and the huge amount of responses during the consultation period. Figure 4 outlines the main dates connected with the regulation. Entry into force is now projected to be within the timeframe of 2027 to 2028. After entry into force, a transitional period of 18 months is to be expected. Considering the complexity addressing two parallel regulations i.e. the F-gas regulation and the potential REACH restrictions compliance will be very difficult to handle and a double regulation should be avoided.

REACH Restriction on PFAS: Process Schedule

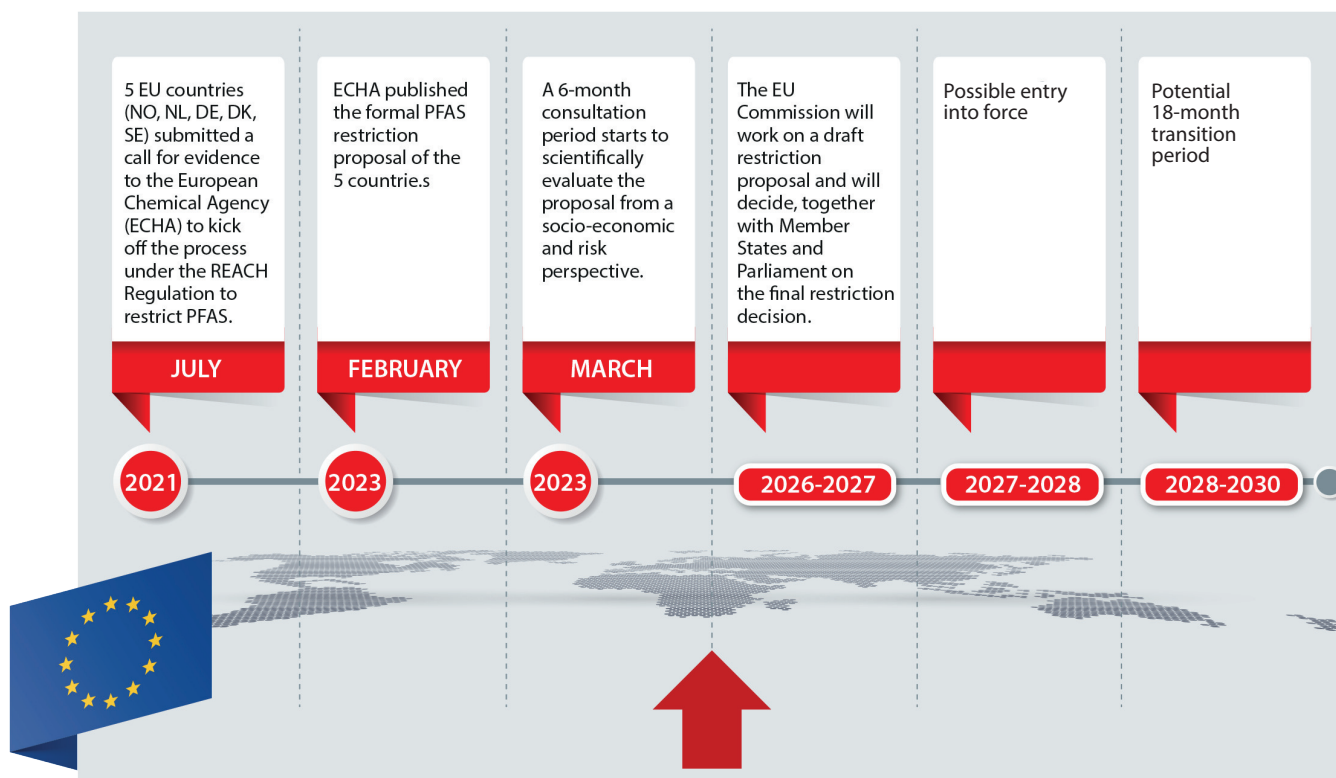


Figure 4: Process schedule.

Standardization and Risk Assessment

All refrigerants are safe in usage if safety standards and safe-handling guidelines are followed. Standards ensure common practices, technological alignment, and legal conformity. This last point is important from the industry’s point of view, since it reduces risk and provides legal assurance when new products are developed and applied correctly by customers. Danfoss contributes to the standardization work behind the development of important safety standards such as ISO 5149, EN378, and ASHRAE 15.

Figure 5 contains a global overview of the main safety standards. The development of standards is moving towards a wider acceptance of flammable refrigerants. The color coding towards ‘red’ shows the trend towards more enclosure of flammable refrigerants.

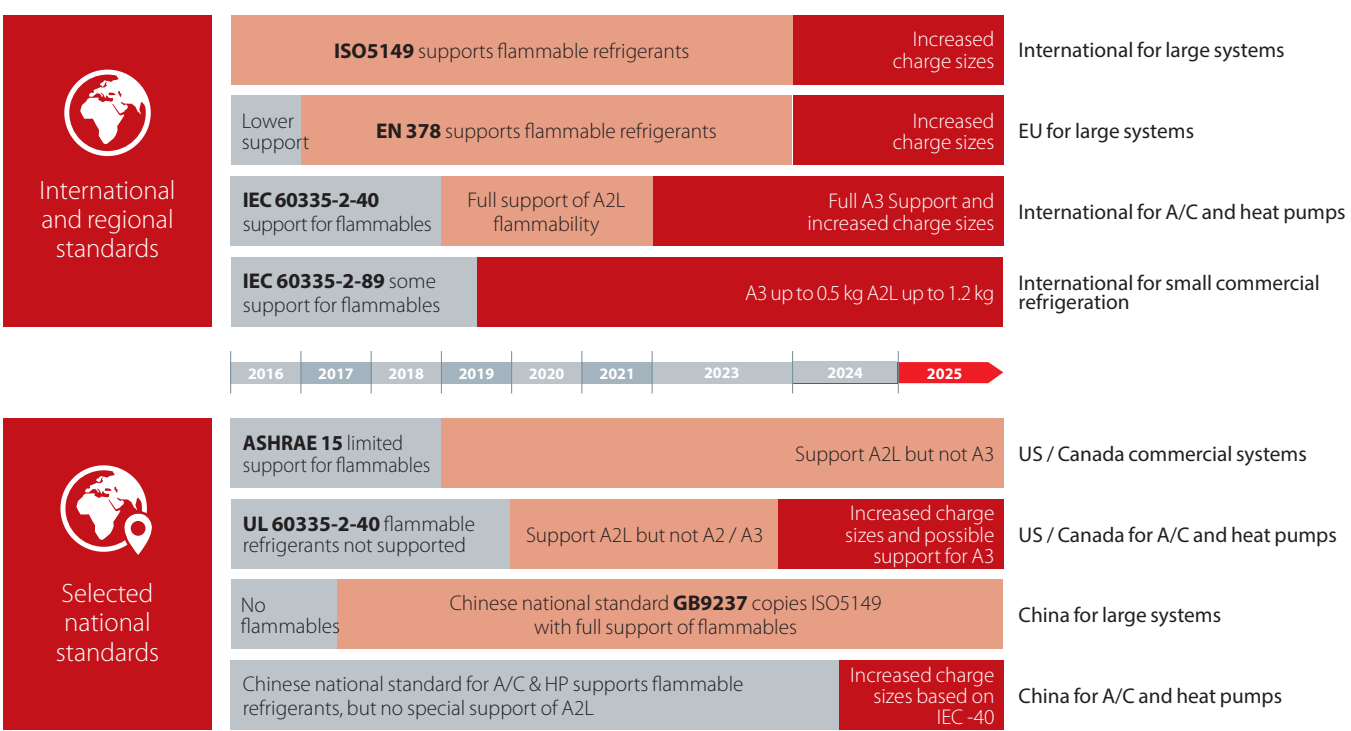


Figure 5: Safety standards development - recognising the need for flammable refrigerants.

Figure 6 shows how refrigerant standards are connected to safety standards. For example, ASHRAE 34 was used in ISO 817 to create the refrigeration classifications. These classifications are in turn used in safety standards like ISO 5149, ASHRAE 15, and the European safety standard EN 378. For more dedicated appliance standards, the IEC standards are used and transposed to regional standards.

When evaluating refrigerants for specific applications, risk awareness is always a crucial parameter. Ask yourself, "What level of risk is acceptable?" Before answering, keep in mind the difference between perceived and actual risk. Perceived risk of the new refrigerant tends to be seen as higher than

the actual risk. As industry competence and user experience increase, we will see a reduction in the perceived risk of using a new type refrigerant. Compare this to the perceived risk of flying versus driving a car: driving a car is often perceived as being safer than air travel, while the opposite is true. It is important to note that all system builders must make a risk assessment of their systems during use and service.

The development of standards is moving towards a wider acceptance of flammable refrigerants. Figure 5 presents an overview of the development of the main standards and the inclusion of flammable refrigerants.

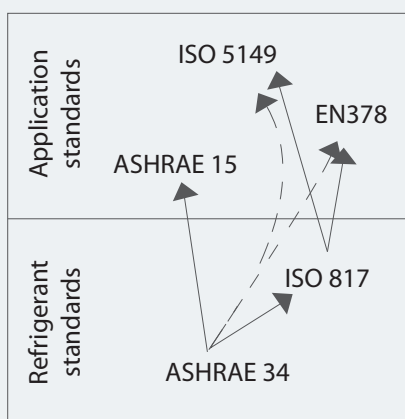


Figure 6: Refrigeration and application standards.

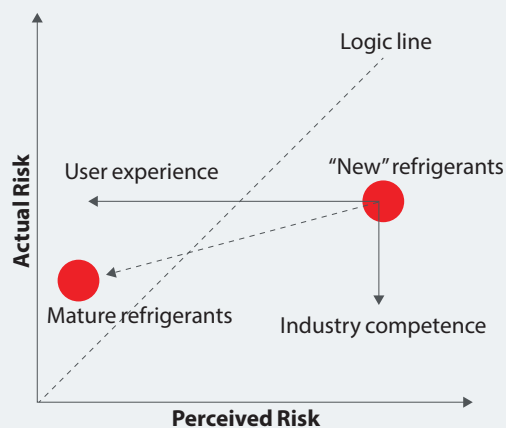


Figure 7: Perceived and actual risk.

Sustainability is the Key

Regarding long-term sustainable refrigerant solutions, Danfoss considers three main parameters that must be aligned to accomplish a real sustainable balance: affordability, safety, and environmental impact.

When choosing a new refrigerant for an application, all three parameters must be considered together to achieve long-term, sustainable results. It is important to look at the many underlying parameters such as lowest life-cycle cost, service availability, operational efficiency, safety, and the GWP of the refrigerant. A sustainable solution will be achieved only when all of these parameters are balanced. Achieving this balance will require a thorough evaluation of the factors which influence these parameters as shown in Figure 8.

Long-term sustainable solutions may not necessarily be economically viable in the short term. While we can engineer a sustainable solution, there are more factors that will determine whether new refrigerant solutions are viable. To quantify the industrial viability of developing new sustainable solutions for new refrigerants, Danfoss has developed a model that breaks down the main parameters.

We call this the Seven Forces model (Figure 9). The red arrows refer to economic factors and the grey arrows are cultural factors such as knowledge, education, and legislation. When the balance between the red and grey

forces reaches the viability level, it becomes much more likely that the industry will start investing in new solutions and technologies. When investing in new technologies and building up competences, legislation and derived standardization are the major drivers.

Over the past ten years, the viability level for many low-GWP refrigerants has been increasing. Good examples are CO₂ applications for commercial refrigeration, especially supermarkets.

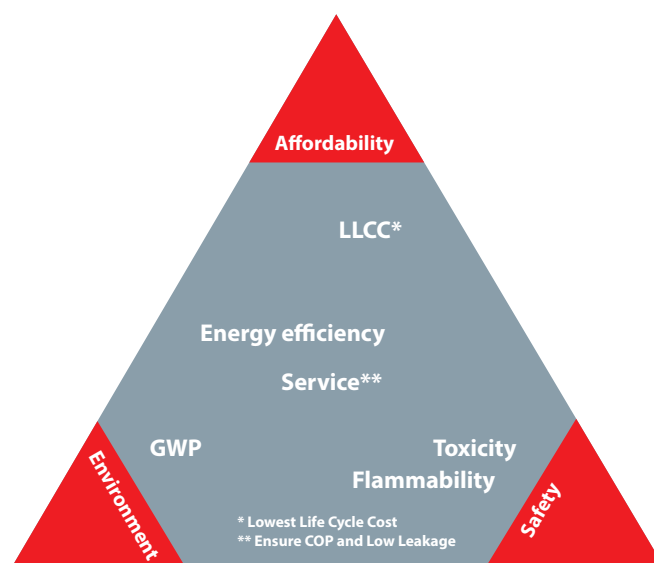


Figure 8: Refrigerant sustainability triangle

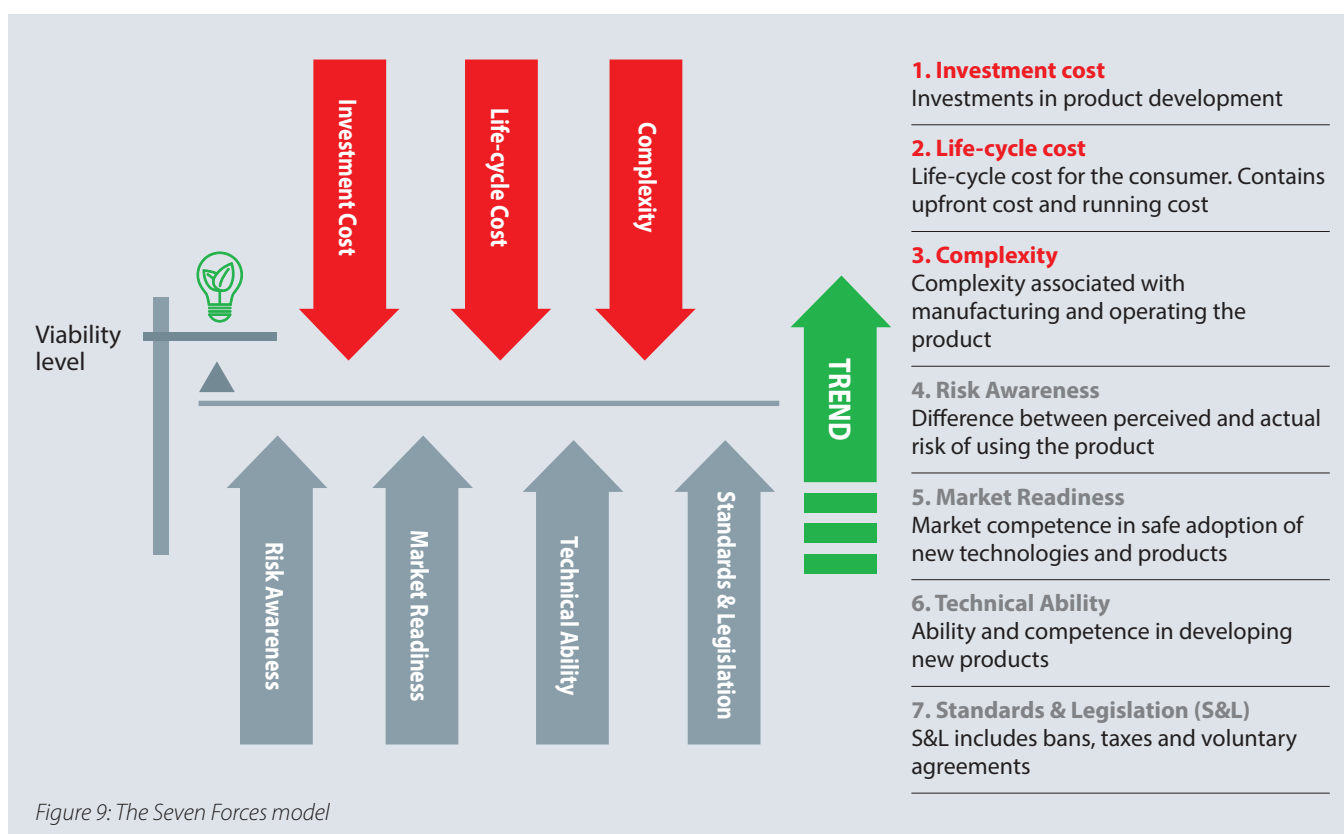


Figure 9: The Seven Forces model

The Outlook

The sustainability triangle (Figure 8) shows the three sustainability parameters and their diverse facets. Both system manufacturers and users want long-term solutions that are environmentally benign, safe, and affordable. Natural refrigerants have an ultra low GWP and they are efficient when used correctly. We expect them to become the preferred choice whenever possible; though safety will still be a limiting factor for some applications.

Our international group of experts within Danfoss has projected what we see as the likely refrigerant outlook. This outlook is summarized in tables 1A and 1B.

The trend shows a growing acceptance of mildly flammable, A2L refrigerants, especially now that they have been incorporated into the new ISO and IEC standards allowing for charge sizes that are appropriate for substitution of the high GWP HFCs. We also see highly flammable A3 refrigerants increasingly being used in smaller systems and outdoor installations like heat pump monoblocks. New upcoming editions of e.g. EN378 will allow significantly higher charge sizes.

A3 refrigerants are supported by the updated IEC 60335-2-89 standard, which currently permits up to 500 g A3 refrigerant in hermetical systems. We anticipate that this limit may increase to 1 kg within a few years. To allow for higher cooling capacities increased charge sizes are necessary. A new measure is to consider 'releasable charge' instead of the full system charge when evaluating the LFL (Lower Flammability Levels). This can be justified if certain parts of the system can be isolated in case of leakage. The new measure is used in the (ed. 7) IEC-60335-2-40.

CO₂ is widely used in industrial refrigeration and commercial refrigeration racks in the EU, NAM, Australia and Japan. We believe that this trend, which started in Europe, will eventually extend to the rest of the world. CO₂ heat pumps are increasingly being used up to MW sizes and often in combination with refrigeration systems using heat recovery

features. CO₂ is special in the sense that transcritical operation is often used for the heat pump mode. This gives some advantages, especially at higher temperatures, but specific system conditions must be observed to ensure high efficiency compared to, e.g., hydrocarbons like R-290. High leaving water temperatures combined with low inlet temperatures are the preferred conditions. Special attention is needed on system configuration, with ejectors playing a key role.

We foresee ammonia continuing to be very well accepted, particularly in industrial refrigeration applications, though its toxicity requires unique safety measures. Low Charge systems are available and they are very efficient. We expect that a solution using both CO₂ and ammonia in cascade will be increasingly used. We see the very energy efficient hydrocarbons playing an important role in low-charge systems around the globe.

We also anticipate a significant increase in air-to-water heat pumps for domestic use, especially in the EU. The use of hydrocarbons in chillers and large-scale heat pumps in systems placed outdoors or in machine rooms will also increase. We don't believe HFCs will disappear, but will be limited to those with the lowest GWP and will be combined with HFOs – a trend which is already happening. HFCs and HFOs are now available in more environmentally-friendly, yet mildly flammable versions, making safety precautions all the more important. The potential PFAS discussion and the accompanying uncertainties are likely to result in some regional preferences for not using F-gases. In conclusion this means a very diverse refrigerant landscape.

The demand for low-GWP refrigerants will continue to challenge our current perception of which refrigerants can be used in certain applications, but will also drive innovations in system design. The EU heat pump growth outlooks for the coming decades will demand safe and ultra-low GWP refrigerants. This can only be obtained with natural refrigerants like R290 and HFO based solutions.

		Air Conditioning & Heat Pump																	
		Residential A/C incl. reversible systems			Rooftop units VRF systems Scroll			Commercial A/C Scrolls incl. reservable units			Commercial A/C Screw / Centrifugal incl. reversible			Res. & Commercial Heat Pumps			Commercial and Industrial Heat pumps		
		Capacity			1-10 kW			10-30 kW			30-400 kW			400 kW - 5 MW			1-10 MW		
Refrigerant	Region/Year	2025	2028	2032	2025	2028	2032	2025	2028	2032	2025	2028	2032	2025	2028	2032	2025	2028	2032
CO ₂ (R744)	NAM																		
	EU																		
	China																		
	ROW																		
NH ₃ (R717)	NAM																		
	EU																		
	China																		
	ROW																		
HC e.g. R290 & R600a	NAM																		
	EU																		
	China																		
	ROW																		
HFC (A1) GWP > 700	NAM																		
	EU																		
	China																		
	ROW																		
HFC/HFO (A1 & A2L) Mid-GWP 300-700	NAM																		
	EU																		
	China																		
	ROW																		
HFC/HFO (A1 & A2L) Low-GWP <150	NAM																		
	EU																		
	China																		
	ROW																		

		Refrigeration														
		Domestic-Household Refrigeration			Light Commercial Refrigeration			Condensing Units			Centralised Commercial racks (Foot retail)			Industrial Refrigeration		
	Capacity	50-300 W			0.15 - 5 kW			3-20 kW			20-500 kW			1-10 MW		
Refrigerant	Region/Year	2025	2028	2032	2025	2028	2032	2025	2028	2032	2025	2028	2032	2025	2028	2032
CO ₂ (R744)	NAM															
	EU															
	China															
	ROW															
NH ₃ (R717)	NAM															
	EU															
	China															
	ROW															
HC e.g. R290	NAM															
	EU															
	China															
	ROW															
HFC (A1)	NAM															
	EU															
	China															
	ROW															
HFC/HFO (GWP < 150) (A2L)	NAM															
	EU															
	China															
	ROW															

** Ammonia/CO₂ cascades will dominate industrial refrigeration

	Main refrigerant	Limited use and only niche applications
	Regular use	Not applicable or unclear situation

Tables 1a and 1b: Global trends in refrigeration, air conditioning and heat pumps.
Status April 2024.

Refrigerant Options

Facing the increasing regulatory pressures to eliminate high-GWP refrigerants, the industry has introduced many alternatives. Generally speaking there is a trade-off between GWP and flammability. As seen in Figure 10, most of the old non-flammable ‘signature’ refrigerants have no simple low-GWP drop-in replacements. Flammability is linked to GWP and refrigerant capacity. With lower GWP and higher capacity comes increased flammability.

The main method for reducing GWP in HFCs is to make them chemically unstable (unsaturated) so Thus, if the are released into the atmosphere, they will quickly break down rather

than remaining in the atmosphere. The main unsaturated F-gases , also known as HFOs (hydrofluoroolefins), are R1234yf, R1234ze (E), and R1233zd. They have very low GWP levels, are non-flammable or only mildly flammable, and belong to a group of lower density refrigerants. Pure high density HFOs as R1132 (E) are unfortunately far too unstable to be used as a single fluid refrigerant. To lower the GWP of higher density HFCs, HFOs and HFCs are blended together. As seen in Figures 13A and 13B, the proposed blends within the same group are similar to each other, with the main differences being which ‘R1234 type’ is used and the exact refrigerant it is replacing.

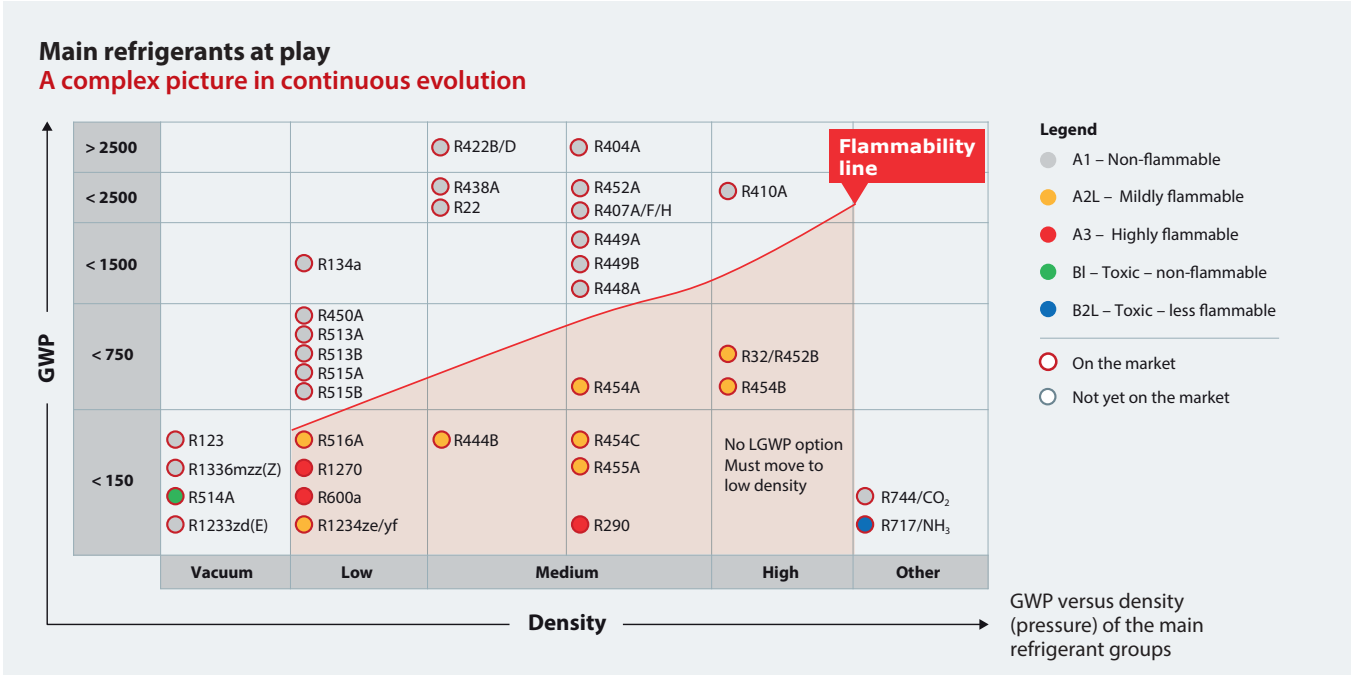


Figure 10: Carbon -chain-based Refrigerants (HCs, HFCs, HFOs, HCFCs), GWP versus density (pressure) of the main refrigerant groups.

According to ASHRAE 34, refrigerants are divided into classes depending on toxicity and flammability (See Figure 11). A1 refrigerants are non-flammable and have very low toxicity. At the other end of the scale, with high flammability and high toxicity, no B3 refrigerants are available. Hydrocarbons, characterized by low toxicity and high flammability, require special precautions. Ammonia, on the other hand, is highly

toxic and has low flammability. It is widely used, especially in industrial refrigeration, due to its high energy efficiency.

The A2L subgroup is made up of refrigerants with low flammability. Flame propagation speed is low, less than 10 cm/s. These refrigerants are already playing a significant role as we move away from the old high-GWP HFCs.

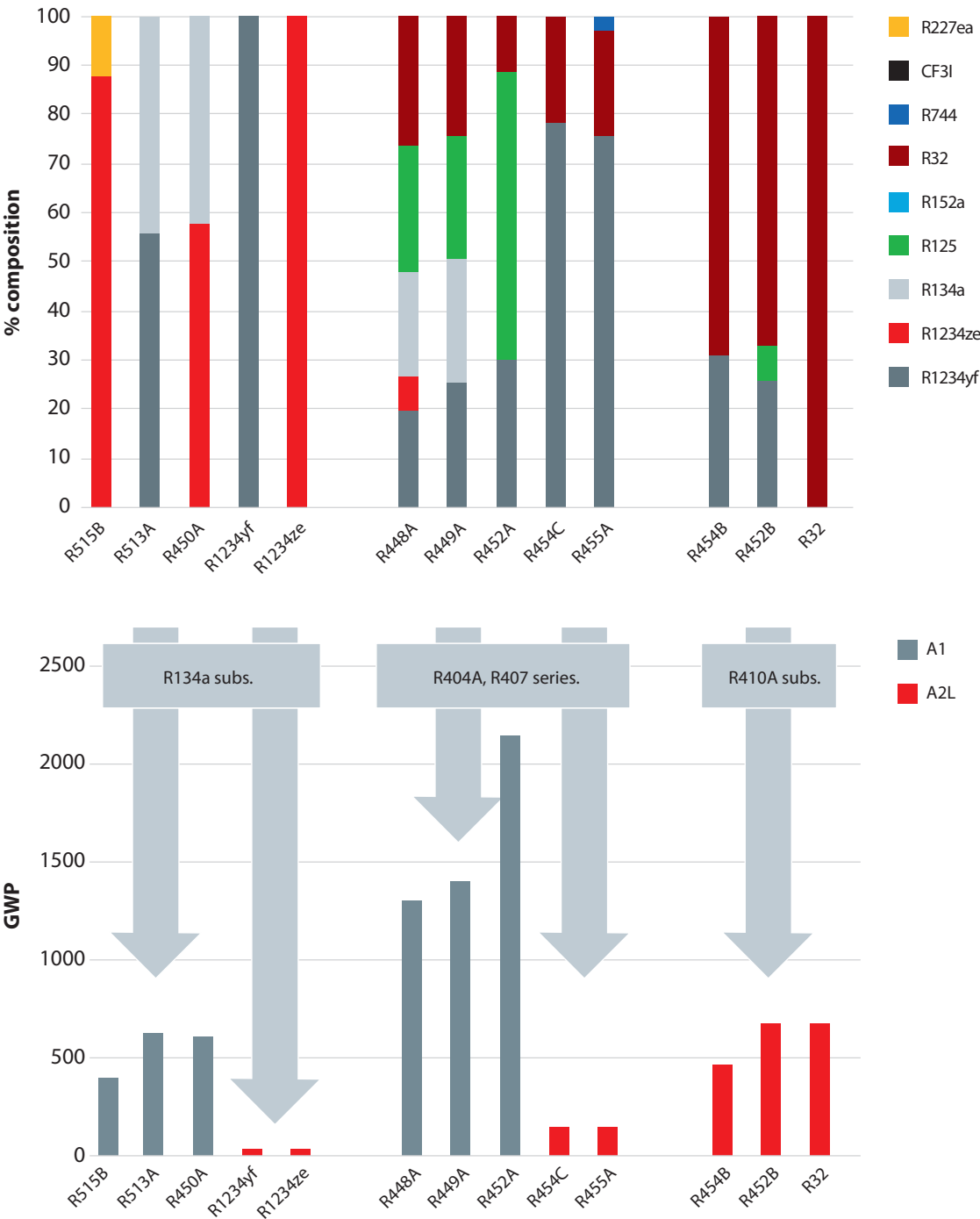
	Lower Toxicity	Higher Toxicity
No flame Propagation	A1: CFC, HCFC, most HFCs	B1: Seldom used
Lower Flammability	A2L: Most HFOs, R32	B2L: Ammonia
Flammable	A2: R152	B2: Seldom used
Higher Flammability	A3: Hydrocarbons	B3: no refrigerants

Figure 11: Refrigerant classes.

There are application-specific pros and cons for using a specific refrigerant. Some important questions to ask could be: How do the energy-efficiency improvement schemes match? Is it intended for a fast drop-in or is it part of a major redesign cycle? What are the climate conditions and will the local markets be ready to handle the refrigerant? What is the impact of glide from a service and energy perspective? Will it make sense to go for one type of refrigerant or will a dual strategy be better? We recommend taking a thorough, balanced approach, such as one using the Seven Forces model outlined in Figure 9.

Today it is evident that A2L refrigerants are efficient and available. Components are available for the main A2L refrigerants. For R1234ze, some special conditions apply. R1234ze is categorized as an A2L refrigerant but is only flammable above 30°C. Therefore, EN 378, which is harmonized with the EU PED Directive, does not recognize R1234ze as a hazardous substance, but as a PED Group 2 fluid. This has the positive effect that it avoids material traceability for pipes and components up to 32 mm in normative diameter while the other flammable refrigerants require traceability at 25 mm.

Main replacement options: composition and GWP levels



Figures 12a and 12b: The main replacement options and their composition and GWP levels.

The usage of approved components for systems containing flammable refrigerants is not a problem if the system builder is designing systems according to the safety standards. Be aware that the system builder always must perform a risk assessment and ensure that an explosive atmosphere cannot arise in case of leakage.

In cases—normally accidental—where leakage occurs and where a temporary flammable atmosphere is foreseen,

ignition sources must be avoided or moved to a non-flammable zone. One method to avoid ignition sources is to use EX approved components. A good guideline—targeting the EU—can be found at the ASERCOM website. This guideline has been established with the input of major components manufacturers. The procedure is shown in Figure 13.

Note that during service, all ignition sources must be powered off.

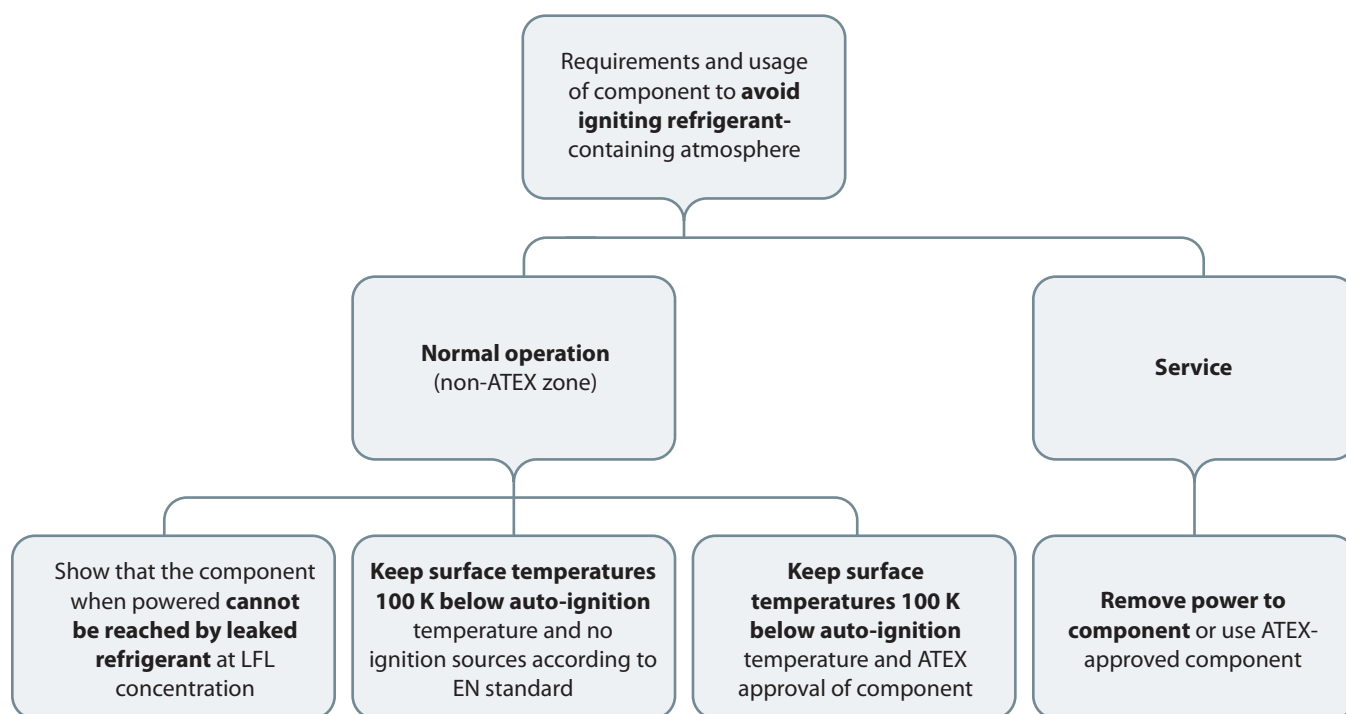


Figure 13: Requirements and usage of components in systems containing flammable refrigerants. Source : ASERCOM.

Conclusions

In a world where the cooling and heating needs are growing, the vapor compression process using refrigerants is more needed now than ever. Selecting the right refrigerants has a big impact on variety of sustainability parameters. While some of yesterday's solutions have had consequences for today's environment, it is imperative that the industry looks ahead to find future-proof solutions to current challenges. Doing so effectively will require a solid working partnership with a company that not only possesses a dynamic history and a comprehensive knowledge of the current standards, legislation, and emerging technologies, but that also maintains a high focus on the future in terms of safety and environmental responsibility. Danfoss is just such a company.

With 90 years of experience, combined with our willingness to meet the challenges of today's industry, we are a leader that is poised to offer our partners sustainable solutions. Danfoss is ready to work with you in defining and implementing the best alternative for your applications. Together we can conquer today's challenges while addressing the needs of tomorrow.

Appendix 1.

Legislation and regulations

1.1 Montreal Protocol

The Montreal Protocol has two regimes to control: the ODP and GWP substances. The phase-out schedule for HCFC can be seen in Table 2 and the phase-down schedules for HFC can be seen in Table 3. It is worth noting that the non-A5 countries rely on baselines that are frozen already while the A5 countries have a combination of the HCFC quota (already frozen) and HFC consumption, which is yet to come.

This uncertainty regarding the baseline has triggered some speculation about the missing incentive for A5 countries to move to low-GWP refrigerants ahead of schedule, as this would decrease their baseline. However, the reality appears to be that the A5 countries are rapidly adopting lower GWP refrigerants.

Group I: HCFCs (consumption)

Non-Article 5(1) Parties: Consumption (Developed Countries)		Article 5(1) Parties: Consumption (Developing Countries)	
Base level:	1989 HCFC consumption + 2.8 per cent of 1989 CFC consumption	Base level:	Average 2009 – 2010
Freeze:	1996	Freeze:	January 1, 2013
35% reduction	January 1, 2004	10% reduction	January 1, 2015
75% reduction	January 1, 2010	35% reduction	January 1, 2020
90% reduction	January 1, 2015	67.5% reduction	January 1, 2025
100% reduction	January 1, 2020, Allowance of 0.5% of base level consumption until January 1, 2030 for servicing of refrigeration and air-conditioning equipment existing on 1 January 2020.	100% reduction	January 1, 2030, Allowance of 2.5% of base level consumption when averaged over ten years 2030 – 2040 until January 1, 2040 for servicing of refrigeration and air-conditioning equipment existing on 1 January 2030.

Table 2: HCFC phase-out schedule and baselines
Source: UNEP

	Non A5-1	Non A5-2	A5-1	A5-2
Freeze	–	–	2024 (100%)	2028 (100%)
Step 1	2019 – 90%	2020 – 95%	2029 – 90%	2032 – 90%
Step 2	2024 – 60%	2025 – 65%	2035 – 70%	2037 – 80%
Step 3	2029 – 30%	2029 – 30%	2040 – 50%	2042 – 70%
Step 4	2034 – 20%	2034 – 20%	–	–
Final	2036 – 15%	2036 – 15%	2045 – 20%	2047 – 15%
Countries	All non A5 except non A5-2 and the EU	Belarus, Russia, Kazakhstan, Tajikistan, Uzbekistan	All A5 except A5-2	India, Pakistan, Iran, Iraq, Bahrain, Kuwait, Oman, Qatar, Saudi, Arabia, UAE
Baseline	HFC-average (2011 – 2013) + 15% of HCFC baseline (non-A5)	HFC-average (2011 – 2013) + 25% of HCFC baseline (non-A5)	HFC-average (2020 – 2022) + 65% of HCFC baseline (A5)	HFC-average (2024 – 2026) + 65% of HCFC baseline (A5)
Comments	HCFC phase-out plan does not correspond to the 15% in 2011 - but likely reflects actual consumption	HCFC phase-out plan corresponds to the 25% in 2010 – 2014	HCFC phase-out plan corresponds to the 65% in 2020 – 2024	HCFC phase-out plan corresponds to the 65% in 2020 – 2024

Table 3: HFC phase-down schedule and baselines
Source: UNEP

1.2 MAC Directive (EU)

This directive bans the use of any refrigerant with a GWP above 150 in air-conditioning systems in motor vehicles starting from:

- January 2011 for new models of existing vehicles
- January 2017 for all new vehicles

The directive does not cover other applications.

R134a, still the most common refrigerant in MACs globally, has a GWP of 1430 and is thus affected by the ban as well. R1234yf is increasingly being introduced globally and today, several millions of cars are using this HFO in the US and the EU and China.

1.3 F-Gas Regulation (EU)

The EU F-gas regulation is considered a front runner, preceding the Kigali Amendment to the Montreal Protocol and going beyond the latter.

The first EU F-gas regulation came into force in 2006 with a focus on containment and service. In 2015, the second version came into force, introducing the phase-down of high GWP hydrofluorocarbon (HFC) refrigerants. On February 20, 2024, the new EU F-gas regulation was published in the official Journal of the EU.

The latter is an extremely ambitious regulation with a long-term full phase out of F-gases. The EU and the US phase-down are illustrated in Figure 14 where the 2015 F-gas regulation is shown in comparison with the new 2024 agreed phase-down. From 2025 the quota is reduced significantly compared to the previous phase-down and, from 2030 the available amount of F-gases even for service is greatly diminished.

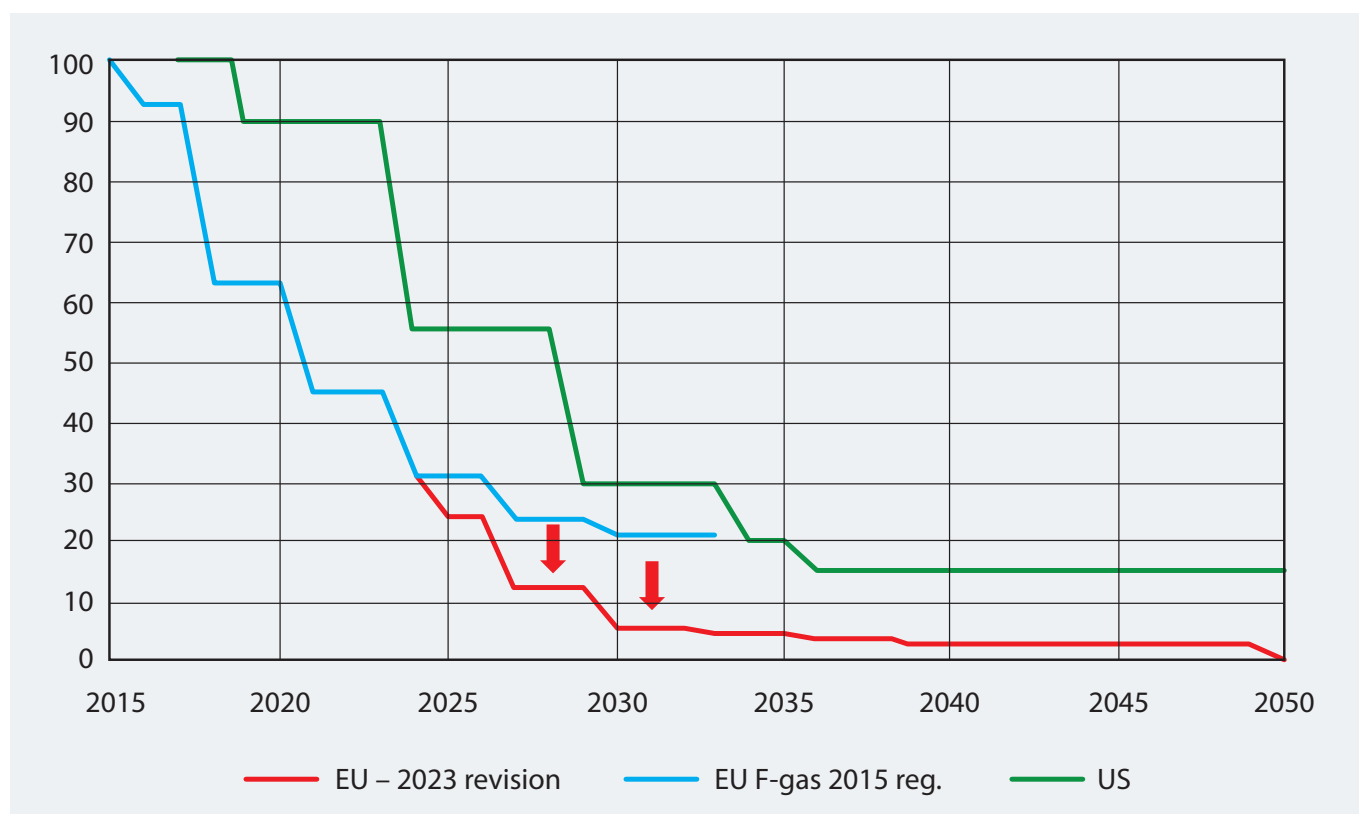


Figure 14: The phase-down the EU and in the US in percentage of baseline.

The quota allocation mechanism has in principle not changed but, the previously exempted Metered Dose Inhalers (MDIs) will be included in the quota as of 2025. Specific sub-quota allocations are made for MDIs and the

available amount for the RACHP industry is consequently reduced with a significant percentage which still has to be specified. The allocation mechanism can be found in the Annex VIII of the Regulation.

1.4 The EU equipment bans

The quota reductions are accompanied by placing on the market prohibitions (bans). Compared to the last revision the amount of bans and level of detail introduced is increasing. The overview can be seen in Figure 15.

Especially the bans outlined in Figure 15 were a big discussion topic during the review period. In light of the aggressive quota reductions, the long term consequence of having an application specific GWP ban is limited due to the pressure on availability of refrigerants via the phase-down steps (measured in CO₂-equivalents, i.e. GWP multiplied by metric quantity, resulting in highest pressure on higher GWP refrigerants). It must be noted that the Commission shall publish a report by January 2030 to evaluate, among others, the overall feasibility of the prohibitions that have not yet become applicable. Criteria include cost-effectiveness, technical feasibility, energy efficiency, availability, and reliability of alternatives. If appropriate, the Commission shall then submit a legislative proposal, which may include changes to the Regulation. Nevertheless, the prohibitions send a clear signal to the market on where to focus development efforts.

Export ban: From 2025 the F-gas regulation introduces an export ban for RACHP systems intended for the use of refrigerants with a GWP ≥ 1000 provided that these systems cannot be placed on the EU market (see Figure 15). This means that the date of the bans in Annex IV (Figure 15) will set the date for the potential export limitations. The restriction is new and it has generated some discussion. The Commission has stated that applications designed for multiple refrigerant use can apply the lowest GWP refrigerant as the measure for determining whether the product can be exported. The intention of the EU is to address concerns

about dumping of equipment, which is obsolete in Europe, into developing countries' markets.

Heat Pumps: The EU ambitions on decarbonizing the heating sector require a massive rollout of heat pumps to phase-out fossil fuel-based heating. The market for heat pumps is already in acceleration mode and there have been valid concerns regarding the availability of F-gases, especially for some of the technologies. This has led to a yearly assessment and a possible extra - but very limited - quota for the years 2025-2029. The concern is particularly related to split systems <12 kW which will also be subject to a GWP limit of 150 from 2027. This can become a serious problem as raised by many industry associations. Small split systems have generally moved to the high pressure refrigerant R32 and a high pressure low GWP version is not available today. Further, the level of flammability of A3 refrigerants such as hydrocarbons, leads to liability concerns among OEMs.

On the other hand, some important applications like small (<12 kW) A/W monoblock heat pumps will have GWP limits of 150 from 2027 and a full F-gas ban from 2032. However, many of these units are already using R290, so this is not expected to be a major problem.

Service bans: Service bans have been strengthened. As of 2025, small refrigeration systems will no longer be allowed to use virgin refrigerant with a GWP >2500. This will target old systems still relying on R404A. From 2032, the limit will be further decreased to a GWP 750. Service and maintenance of AC and HP equipment will likewise be restricted to a GWP level of 2500 from 2026. It is important to note that reclaimed and recycled refrigerant can still be used. An overview of the service ban can be seen in Figure 16.

The phase-down and the bans*

All bans are conditioned on sufficient safety requirements and exemptions for low temp. (< -50°C)

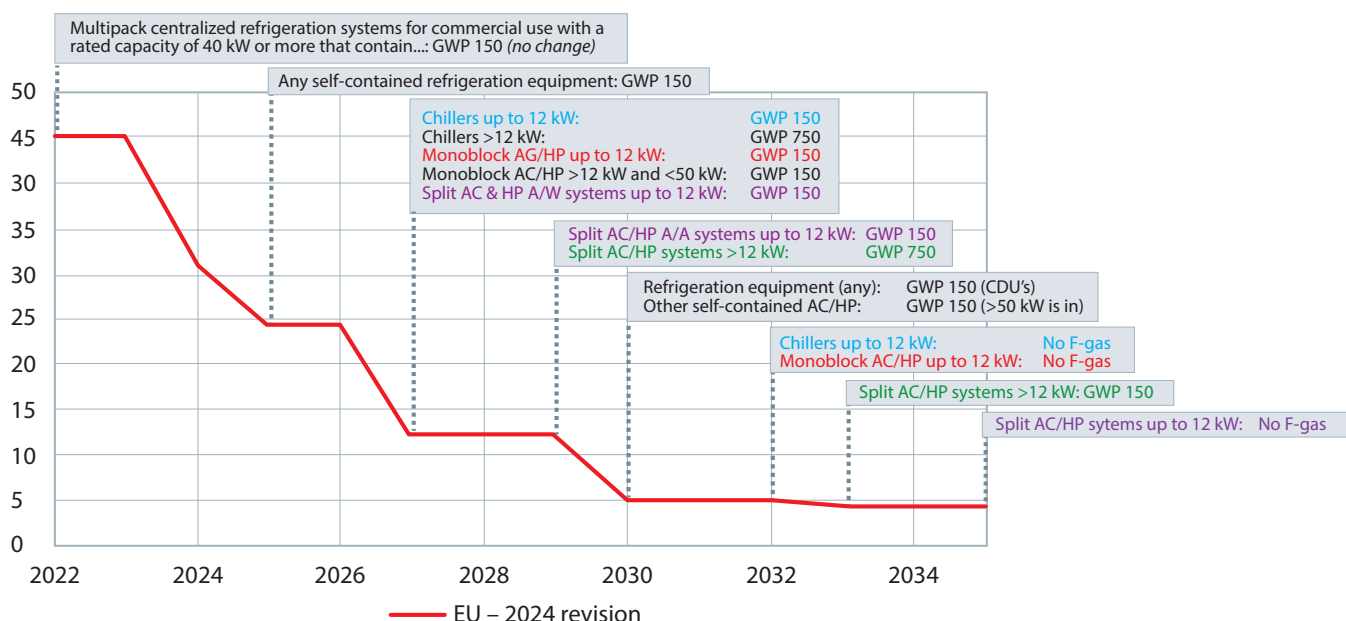


Figure 15: The market prohibitions as in the ANNEX IV of the EU 2023 F-gas regulation.

*Pending evaluation by 1 January 2030, especially products and equipment subject to full F-gas prohibitions.

		2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
Refrigeration equipment <i>Equipment for intended usage below -50°C is exempted.</i>	Virgin refrigerant	GWP <2500 <i>No lower capacity limit compared to the previous regulation.</i>							GWP <750 <i>Stationary equipment excluding chillers.</i>				
	Recycled/ reclaimed refrigerant	No service prohibition					GWP <2500						
AC and Heat Pump equipment	Virgin refrigerant		GWP <2500 <i>The Commission may authorise exemptions for up to 4 years in case of verified shortage of recycled and reclaimed refrigerant</i>										
	Recycled/ reclaimed refrigerant		No service prohibition							GWP <2500			

Figure 16: The Service bans imposed by the 2023 EU F-Gas regulation.

1.5 US HFC phase-down

In 2020, the US passed the AIM Act (American Innovation and Manufacturing Act) which aligned with the phase-down steps in the Kigali Amendment to the Montreal Protocol, which was ratified by the US Senate two years later, in 2022. The AIM Act provisions are now being implemented by the Environmental Protection Agency (EPA) via the Technology Transition Rule (TT). All refrigerants need to be approved via the EPA administered SNAP (Significant New Alternatives Policy) Program before they can be placed on the market and building codes need to allow their use. The latter have been a barrier for the deployment of flammable refrigerants – especially flammable A2L refrigerants. However, the upgrade of building codes is now well under way. The TT Rule was published in Oct 2023, listing GWP limits by sub-sector of application, although some definitions are

still being clarified. Compliance dates for those limits are set between 2025 and 2028 dependent on the subsector with sell through periods extending these dates by 1 or 3 years.. Compared to the EU bans the implementation period of the GWP restrictions is rather short. The GWP levels reflect the higher US quota – compared to the EU – especially for residential AC split systems, and there are no full F-gas bans long term. Figure 18 shows a simple and very limited overview on some main sectors. Especially in the refrigeration sector there is a considerable number of systems with a GWP limit of 150. In many of these applications we foresee the uptake of natural refrigerants like CO₂. In the higher temperature applications, the GWP limit is 700, which can be achieved with well-known A2L refrigerants like R32 and R454B.

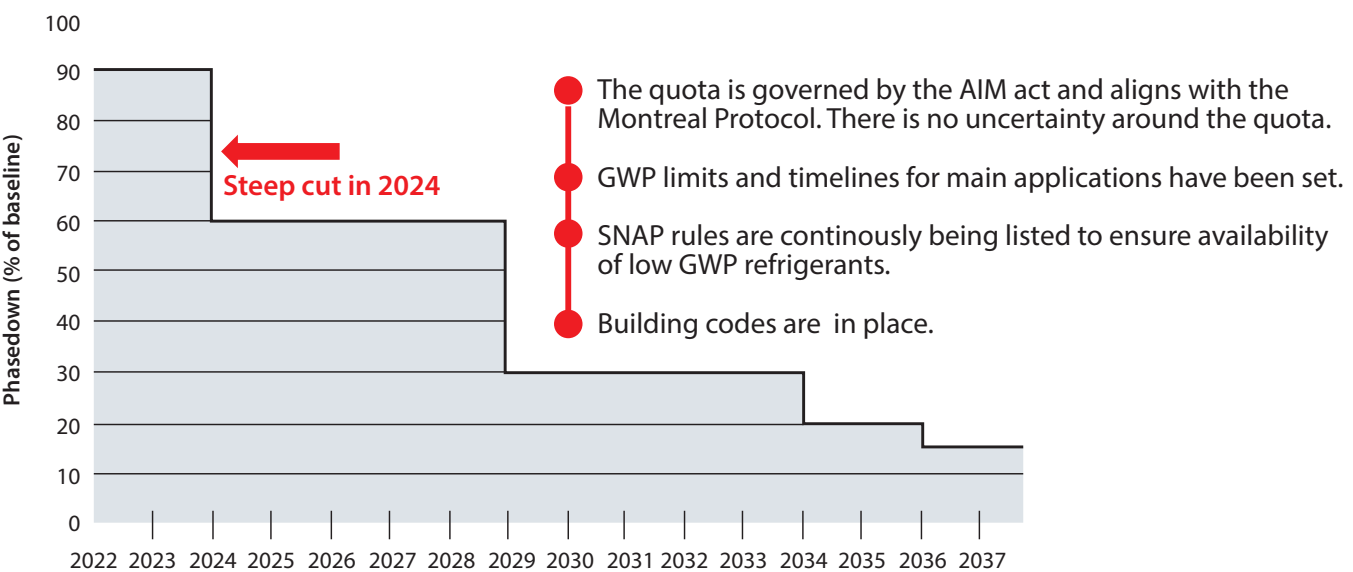


Figure 17: The US phase-down.

Following the phase-down targets means that the applications will change refrigerant types dramatically. This will impact the whole HVACR value chain and likely some of the behavioral patterns observed in the EU will be repeated. The GWP limits within specific sectors can be found on the EPA homepage. Compared to the EU there is

an additional approval mechanism for allowance of refrigerants. The (SNAP) Program was developed by the EPA as a tool implementing the ODP phase-out in 1989. The SNAP concept is to accept—or eventually ban—specific refrigerants for safe usage in defined applications.

Main sectors	GWP levels	Compliance date
Refrigeration*	150-300-700**	2025-2027
Data centers	700	2027
Transport	700**	2025
Chillers	700	2025-2028
Ice rinks	700	2025
Res A/C	700	2025-2026

* Below -50°C is not covered by specific GWP limits

** See also specific listings of refrigerant for certain subsectors

Table 4: GWP limits for specific main sectors.

- Appears more complex compared to the EU bans but likely avoids confusion on the definitions
- No full F-gas bans
- GWP limits on par with EU numbers
- Compliance dates catching up on the EU

There are basically three steps in accepting and introducing a new refrigerant into the market. The first step is for the EPA to list the new refrigerant as an acceptable substitute through its SNAP rules; the second step is to establish safety standards for design and usage; and the final step is to establish building codes to accept the usage of the new refrigerant which can harmonize with safety standards. However, the three parameters are not directly aligned, and the periodic updates are not synchronized, which makes the refrigerant transition a rather lengthy process.

Given the factual phase-down, it's critical that building codes are harmonized with the ASHRAE 15 safety standard. It's also important that AC applications be allowed for A2L refrigerants. California has been a frontrunner in the transition towards lower GWP refrigerants. Other states have followed and today the situation across states is nearly resolved. However, looking at the California application schedule will give a good indication of the longer-term picture of the US especially considering the overall phase-down constraint.

SNAP

SNAP Rule 17

Rule 17 allowed four specific hydrocarbons for use in household refrigerators and freezers and retail food refrigeration:

- Up to 57g R600a for the household segment
- Up to 150g R290 for the retail segment

Since this rule was established, several other applications have been allowed with an overview of additional rules forthcoming.

SNAP Rule 20 and 21

Rules 20 and 21 delist a series of high GWP refrigerants for specific applications such as chillers and refrigeration equipment. Rule 21 also accepts R290 in ice machines, water coolers, and very low temperature equipment.

Following a federal court case against the U.S. EPA, rules 20 and 21 were vacated and are now implemented according to local state legislation.

SNAP Rule 23

In 2023, the U.S. EPA issued a Proposed Rule Making for SNAP Rule 23. This rule would list several A1 and A2L refrigerants as acceptable substitutes in several sectors, including:

- Food retail: R-448A, R-449A, and R-449B
- Residential and light commercial air conditioning and heat pumps: R-452B, R-454A, R-454B, R-454C, and R-457A
- Residential and light commercial air conditioning and heat pumps excluding self-contained room air-conditioners: R-32

Rule 23 will help enable a smooth transition to A2L refrigerants.

SNAP Rule 26

In 2023, the US EPA issued a proposal for SNAP rule 26. This rule lists several HFC/HFOs and R290 for a broad range of refrigeration applications

- Commercial ice machines R32, R1234yf, R454A, R454B, R454C, R455A, R457A, R516A
- Industrial Process Refrigeration : R32, R1234yf, R1234ze(E), R454A, R454B, R454C, R455A, R457A, R516A
- Cold storage warehouse : R1234yf, R1234ze(E), R454A, R454C, R455A, R457A, R516A
- Ice Skating rings : R1234yf, R1234ze(E), R454C, R455A, R457A, R516A
- Retail Food Refrigeration – Refrigerated food processing and dispensing equipment and stand alone units: R1234yf, R1234zeE, R454C, R455A, R457A, R516A
- Retail Food Refrigeration – Supermarket systems and remote condensing units : R1234yf, R1234zeE, R454C, R455A, R457A, R516A
- Commercial Ice Machines (New)—Self-contained Units : R290
- Retail Food Refrigeration (New)—Stand-alone Units : R290

Rule 26 will as rule 23 help the transition towards A2L refrigerant and also the transition towards R290.

California

- California is going beyond the SNAP ruling and imposing a challenging GWP-based phase-down plan. This plan is often regarded as the trendsetter for new marketing and technology. The following targets have been set for the refrigeration sector:
- Refrigerants with a GWP greater than or equal to 150 will not be allowed in new stationary refrigeration systems charged with more than 50 pounds, effective in 2022.
- Companies operating food retail facilities with refrigeration systems charged with more than 50 pounds

- must collectively meet a GWP weighted average or certain percent greenhouse gas potential (GHGp) reduction relative to a 2019 baseline by 2026 or 2030. Rules depends on number of stores operated by the company and can be found on the homepage of California codes of regulations.
- Refrigerants with a GWP greater than or equal to 750 will not be allowed in new stationary air conditioning equipment, effective 2023.

Ice Rinks

- A GWP limit of 150 for new refrigeration systems containing more than 50 pounds of refrigerant and new chillers in new ice rinks, effective 2024.
- A GWP limit of 750 for new refrigeration systems containing more than 50 pounds of refrigerant and new chillers in existing ice rinks, effective 2024.

For air conditioning the following targets are set:

- A GWP limit of 750 for new residential and commercial stationary air conditioning equipment effective 2025 and effective 2026 for air conditioning equipment that are variable refrigerant flow or variable refrigerant volume systems.
- A requirement for a minimum use of reclaimed refrigerant in an amount equal to 10% of the amount of R-410A that enters California in new equipment in 2023 and 2024.
- A GWP limit of 750 for new chillers used for air conditioning, effective 2024.

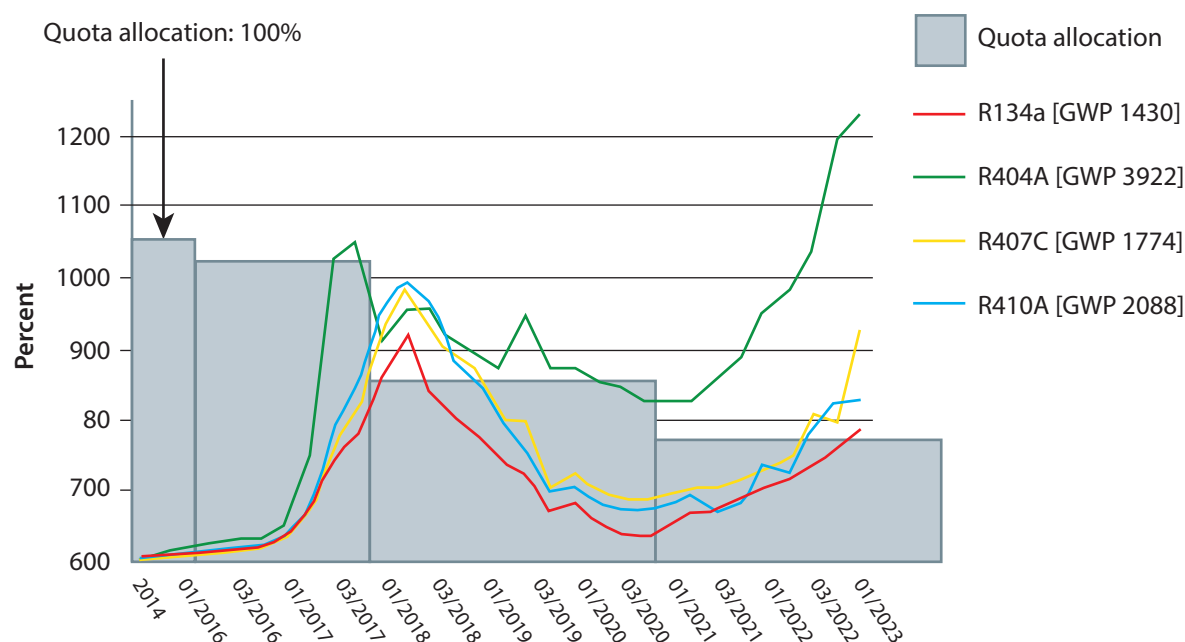
Year	System limit for refrigerant containment in new stationary systems	GWP limit
2021	Refrigeration systems $\geq$ 50 pound	150
2021	Refrigeration systems $\geq$ 20 and $\leq$ 50 pound	1500
2021	Air-conditioning systems $\geq$ 2 pound	700
Sales restriction on refrigerants		
2021	No production, import, sales, distribution, or entry into commerce	2500
2024		1500

Table 5: Detailed view of California's regulation on HFC restrictions.

Price development on refrigerants

Considering the market dynamics during a phase-down, some of the lessons learned in Europe may, to a certain extent, impact the speed of technology transition in the US. One very important factor is the availability of refrigerants and the timely development of the refrigerant prices. Figure 18 shows the EU price development with the overlayed quota reduction. There was obviously a delay in

price increases due to considerable stockpiling and a 'relaxed' market that didn't feel the urgency before it was too late. The market was suffering for years until the uptake of low GWP equipment started to kick in. It is difficult to predict if we will see the same trend in the US, as it depends on many other parameters, such as leakage rates and the ability to recycle and reclaim refrigerants.



EU development of purchase prices at Distribution on Distributor level
(Source: Öko-Recherche) overlayed with quota allocations.

Figure 18: Price development in the EU with overlaying quota reduction.

The Clean Air Act Section 608 extends the requirements for refrigerant usage. It lowers the leak-rate thresholds that trigger the duty to repair ACR equipment:

- Lowered from 35% to 30% for industrial process refrigeration
- Lowered from 35% to 20% for commercial refrigeration equipment
- Lowered from 15% to 10% for comfort cooling equipment

It requires quarterly/annual leak inspections for ACR equipment that has exceeded the threshold leak rate and requires owners/operators to submit reports to the EPA if systems containing 50 or more pounds of refrigerant leak 125% or more of their full charge in one calendar year. It further requires technicians to keep a record of refrigerant recovered during system disposal from systems with a charge size from 5 – 50 lbs.

In September 2024 the EPA set the final rules on management of HFCs and their substitutes under the AIM Act (see EPA homepage for detailed informations)

The following requirements are considered:

- Leak repair for certain appliances;
- Use of automatic leak detection systems for certain new and existing appliances;
- A standard for reclaimed HFC refrigerants;
- Servicing and/or repair of certain refrigerant-containing equipment with reclaimed HFCs;
- Initial installation and servicing and/or repair of fire suppression equipment with recycled HFCs;
- Recovery of HFCs from disposable cylinders prior to disposal; and
- Record keeping, reporting, and labeling.

1.6 China HCFC Phase-out Management Plan (HPMP):

The Chinese Green Cooling Action Plan submitted in June 2019 states that the HFC phase-down will follow the Montreal Protocol schemes agreed in October 2016. Besides having a focus on HFC phase-down, ambitious energy-efficiency targets for specific applications are also planned in a short period. The total picture of the HCFC phase-out and the HFC phase-down is seen in Figure 20. To fulfill the HCFC phase-out plan, the Chinese authorities are supporting projects for replacing HCFCs with alternative refrigerants according to the phase-out plan, which can be found on the UNEP homepage. Furthermore, to facilitate the HCFC phase-down plan and prepare for HFC phase-out plan, the Chinese government has

requested manufacturers to declare the consumed amount of refrigerants for further quota and monitoring management.

The evaluation of candidates has not only focused on the ozone depletion potential (ODP), but also on GWP, safety and suitability for the application. The recommendations from the Chinese authorities depend on the application and the time perspective, see Table 7. The recommendations include using a variety of known low-GWP refrigerant and are backed by the adoption process of international safety standards such as ISO 5149 (GB/T9237) and the IEC 60335 series. These standards are under review and updated as the versions indicate.

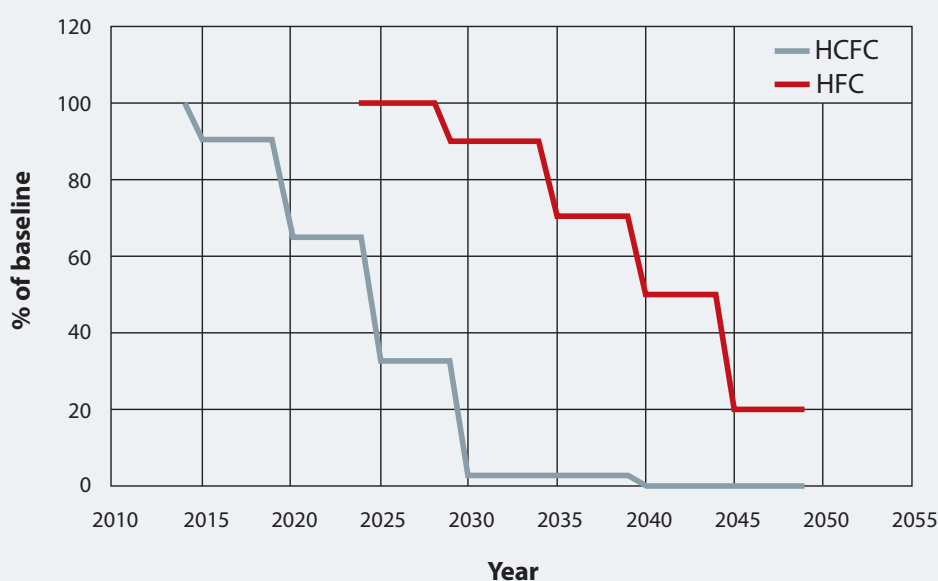


Figure 19: The HCFC phase-out and the HFC phase-down for China.

Application	Present	Mid term 2029	Long term
Centrifugal and Screw Chillers	< 1,5 MW : R134a → > 1,5 MW : R123, R134a →	R1234ze / R513A → R1233zd / R1336mzz / R514A →	R515B R1234ze
Scroll Chillers	R410A	R32	R515B
Air handling units/Rooftops	R410A	R454B	R1234ze / R1234yf / R516A
Low ambient Heat Pump	A/A: R410A → W/W: R410A →	R32 / R454C / R290 → R454C / R454B →	R454C / R290 R454C
AC Split units / VRF / CRAC	R410A	R410A / R32 / R454B	R32 / R454B
Industrial Refrigeration	R717 / R744 / R507	R717 / R744 / R507	R717 / R744
Centralised systems / Supermarkets	R22 R404A / R507	R404A / R507 R448A / R449A R744	R448A / R449A R744
Process Chillers	R22 R134a R744	R1234ze / R1233zd R744	R1234ze / R1233zd R744
Condensing Units	R22 R404A	R404A R22 R448A / R449A / R452A	R448A / R449A R452A R290
Self Contained units	R134a / R404A R600a / R290	R134a / R404A R600a / R290	R134a / R513A / R1234yf R600a / R290

Table 6: Refrigerant options per application.

China standard		IEC standard		
No	latest version	Corresponding version of IEC	No	latest version
GB4706.13	2014	2012	IEC60335-2-24	2020
GB4706.32	2012	2005	IEC60335-2-40	2018
GB4706.102	2010	2007	IEC60335-2-89	2019

Table 7: The IEC60335 series versus the Chinese standards

1.7 Japan

In 2014, Japan introduced a comprehensive program to reduce the emission of HFCs. The program is a life-cycle approach to reducing the GWP of the applied HFCs as well as reducing the leakage of systems in the field (service and

recycling) and during end of life. The system does not apply direct bans or specific quota allocation as seen in the US or the EU. Instead it targets specific GWP values for specific applications combined with a labeling program.

Application	Target GWP value (MAX)	Target year for full implementation
Room air conditioning	750	2018
Commercial air conditioning	750	2020
Commercial refrigeration	1500	2025
Cold storage	100	2019
Mobile air conditioning	150	2023

Table 8: GWP values and timeline.

1.8 Other local initiatives

A number of countries and regions have already taken steps to promote low-GWP alternatives. Such steps include a cap on the refrigerant charge (Denmark), taxation of high-GWP

refrigerants (for instance in Denmark, Norway and Australia), and subsidies for systems that use natural refrigerants (for instance in Germany and the Canadian province of Quebec).

Appendix 2.

Impact of direct leakage as a function of the leakage rate

Example:

The following example can serve to illustrate the relationship between direct and indirect impacts.

Typical refrigerant plant in a medium-sized supermarket:

- Store size: 1000 – 1500 m²
- Refrigerant: R404A
- Refrigerant charge: 250 kg

- Cooling capacity: 100 kW
- Energy consumption: 252,000 kWh/year
- Service life: 10 years
- GWP: 3920
- Operating time: 19 hours per day
- Recovery/recycling: 90%

CO₂ emissions from electricity production

Country A (fossil fuels): 0.8 kg CO₂ per kWh
Country B (hydro and wind power): 0.04 kg CO₂ per kWh

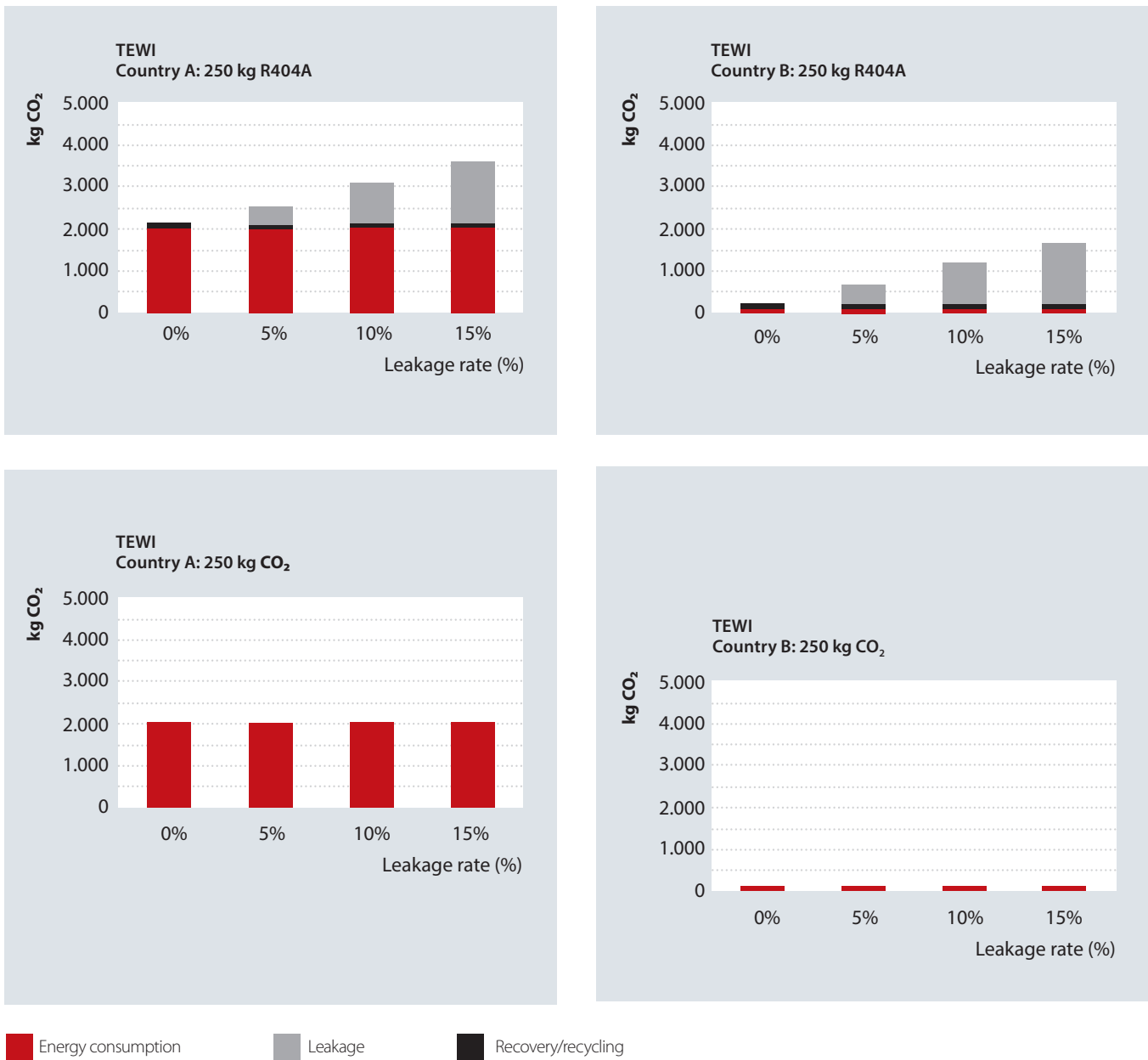


Figure 20: Relationship between the direct and indirect impacts of the refrigeration system.

Appendix 3.

History

Nearly two hundred years have passed since Jacob Perkins patented the vapor-compression cycle, which began the history of refrigerants. The vapor-compression cycle uses the refrigerant to transport heat from the cold side to the hot side of a refrigeration system, heat pump, or air-conditioning system. We use the same thermodynamic cycle today, though the refrigerants have changed.

Figure 1 shows the development of refrigerants since 1835. In the beginning, all refrigerants were easily obtainable as they existed in nature or were already used in industrial processes. By the 1930s, it became obvious that there were critical safety issues involving many of these early refrigerants, including cases of fires and poisoning caused by refrigerant leaks. It was at this time that synthetic safety refrigerants called chlorofluorocarbons (CFCs) were invented and began to be used on a global scale. Development of synthetic refrigerants continued in the 1950s, when partially chlorinated refrigerants (hydrochlorofluorocarbons or HCFCs) were introduced, including R22.

In the early 1970s, it was discovered that CFC and HCFC refrigerants caused a breakdown of the ozone layer. CFCs have a particularly high ozone depleting potential (ODP) and while HCFCs are comparatively lower in ODP, they still wreaked havoc. As a consequence, the Montreal Protocol—the global phase-down mechanism on substances that deplete the ozone layer—was established in 1987 and has since been regarded as a global success on reducing

dangerous chemicals. In addition to reducing the ODP load in the atmosphere, the reduction of CFC emissions has also considerably decreased the global-warming impact. Substitute refrigerants, called hydrofluorocarbons (HFCs), have an ODP of zero, but medium to high global warming potential (GWP) though still lower than phased-out CFCs. Due to the growing threat of climate change, usage of HFCs has been scrutinized in an attempt to reduce their impact on the environment. Scientific investigations show that while the impact of HFC leaks may not currently be a major contributing factor to global warming, their growing consumption, especially within air-conditioning units in developing countries, will eventually make HFCs a top global-warming contributor if phase-down measures were not introduced. In October 2016, the parties of the Montreal Protocol agreed to a phase-down for HFCs. The phase-down came into effect in 2019 and will help significantly reduce the use of high-GWP gases.

In summary, if we do not practice environmental stewardship, refrigerants may cause severe, long-term environmental consequences. History has been a learning curve away from the flammable and toxic refrigerants towards safe solutions, but ones that were environmentally destructive, making them only short-term solutions. Technological developments, together with recognized safety standards, have finally made it possible to begin moving towards real long-term solutions with zero ODP, low GWP refrigerants.

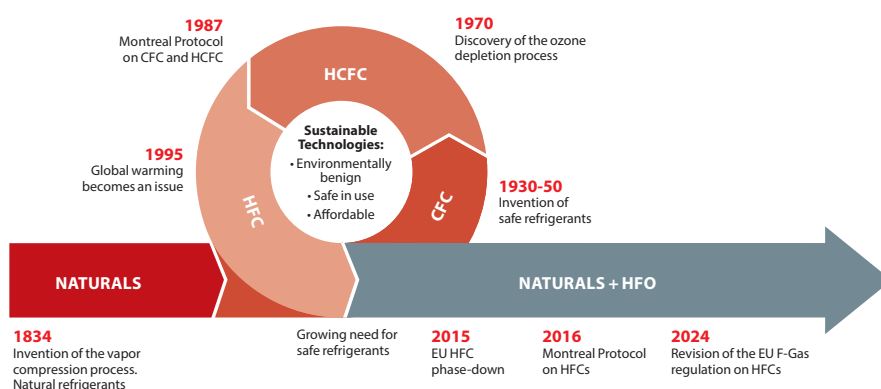


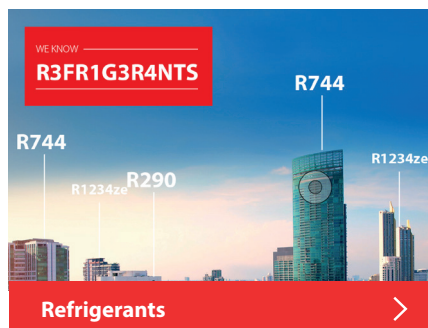
Figure 1: The historical cycle of refrigerants.

Danfoss and **low-GWP refrigerants**

Sustainable solutions are in the best interests of all stakeholders in our industry. Sustainability safeguards long-term investments and ensures compliance with Corporate Social Responsibility. Today, when talking about refrigerants and long-term sustainability, Danfoss considers three main parameters that must be aligned to accomplish a real sustainable balance: **affordability, safety, and environment**. In order to enable the

market to achieve these CO₂ eq reduction targets, Danfoss is actively working on **solutions for alternative refrigerants** with a pragmatic approach, keeping system efficiency, costs and safety in mind. The company offers **a wide range of products and solutions for low-GWP** synthetic and natural refrigerants for both refrigeration and air-conditioning applications.

Refrigerant tools:



Solutions for today and tomorrow

Intelligent solutions, combining natural, low-GWP refrigerants and high energy efficiency, are the road to sustainable refrigeration and air conditioning. Danfoss takes a proactive approach to further the development and use of low-GWP refrigerants to help abate global warming and to ensure the competitiveness of the industry.

Danfoss invests in the development of products for low-GWP refrigerants, both natural and synthetic to fulfil customers' needs for practical, safe and energy-efficient solutions. Our product portfolio already offers a full program of control components for CO₂, ammonia and hydrocarbons. The Danfoss product range is constantly developed to offer state-of-the-art energy efficiency in every component, from compressors to heat exchangers and everything in between.

Obtaining sustainable solutions is a fine balance between affordability, safety and environmental concerns. Based on our long-standing, sustainable mindset and our dedication to pioneering new technologies, we consciously pursue new developments aimed to be a sustainable balance.

Scan here for a direct access to
**Danfoss portfolio for
lower-GWP refrigerants**



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