



# F- GAS AND REFRIGERANT STATEMENT

## July 2007

### WHAT'S IT ALL ABOUT...

With the increasing attention, priorities and pressures being applied to environmental issues and responsibilities, particularly with regard to the negative effects of greenhouse gas emissions, Regal have prepared this statement for the benefit of and advice to its clients who use refrigerant based Air Conditioning systems and as operators / end users who have a responsibility to be aware of and compliant with the new regulations.

Regal clients are currently classed as operators / end users of Refrigeration and Air-conditioning systems and will naturally have concerns with regard to their obligations to be compliant now and with the emerging F-gas regulations. These regulations are well explained in a statement from the Air Conditioning and Refrigeration Industry Board (ACRIB) and we provide the content of their bulletin dated 28th June 2007 as follows:

### 4TH JULY 2007 F-GAS REGULATION REQUIREMENTS

The European Union's F-gas Regulation No 842/2006 imposed obligations on operators of equipment containing HFCs. Many of these come in from 4 July 2007 but some require detailed clarification from the Commission. The Commission recently confirmed that this clarification will not be available until October, but that this delay will not affect the date on which the requirements come into operation.

### WORKING GROUP CLARIFICATIONS DELAYED

This announcement follows a Commission F-gas Regulatory Committee Working Group Meeting that took place in Brussels on the 18 and 19 June 2007. At this meeting a number of Decision papers were discussed and feedback from member states aired. The Commission feels that as discussions are still ongoing on a number of issues, a vote could not take place in advance of the 4th July deadline which is specified in the Regulation.

A meeting will be held in July at which guidance documents on leak checking procedures, training and certification of companies and personnel, labelling of new equipment and reporting for producers of F-gases are likely to be finalised. DEFRA has been consulting with UK industry on the contents of these drafts and seeking views on how the Regulation will be implemented within the UK. These will then need to be formally voted on in October before application in member states.

### GUIDANCE UNDER DISCUSSION

However, a number of interesting issues have been discussed informally at this stage – for example:

**Return inspection visit** – The Commission confirmed that the additional check once the leak has been repaired does not have to take place on a separate day or require a separate visit.

**Minimum training requirements** – On behalf of UK industry, DEFRA officials continue to highlight concerns regarding the proposed minimum requirements which go far beyond our existing refrigerant handling standards in the UK under C&G2078/CITB and are not

directly relevant to emissions reduction, whilst not including some activities the UK feels are closely linked to containment of emissions. Some of the other member states are beginning to voice similar concerns. It has been suggested that training requirements are also likely to apply to precharged equipment connected by snap fit connections, such as units currently marketed for DIY installation.

**Labeling of new equipment** – This relates to the manufacture of new equipment (not existing equipment) and to site-fabricated systems, but is not likely to apply until some 6 to 9 months after the specification for the label requirements has been agreed.

**Interpretation of Operator and Container** – The Commission is working on clarification statements regarding how to define who is the operator and how the ban on disposable containers will operate. These should also be confirmed in October.

### OBLIGATIONS FROM 4TH JULY 2007

In spite of this time delay, the following legal obligations remain in place for the 4th July for users of F-gas refrigerants including:

Articles 3.1 and 4.1 - Operators of equipment must **prevent leakage**, ensure leak checks are carried out and repair any leaks as soon as possible, as well as arranging proper refrigerant recovery

Article 3.2 - Operators must ensure systems are **checked for leaks**:

- At least annually if more than 3kg charge (hermetically sealed more than 6kg)

- At least once every six months if over 30kg. If they have an automatic leakage detection system they need only be checked once every 12 months

- If a leak is detected and repaired, a further check must be carried out on the repair site within one month to ensure that the repair has been effective

Article 3.3 - **Automatic leakage detection systems** must be installed on applications with 300kg or more, and these systems should be checked every 6 months. There are certain derogations – check the regulation for details

Article 3.6 – Operators must **maintain records of refrigerant** in equipment with a charge of 3kg or more (if hermetic, 6kg or more). Records to be made available to the competent authority on demand. A sample record log is available from ACRIB at [www.acrib.org.uk](http://www.acrib.org.uk)

Article 5 - Personnel involved in installation, maintenance, servicing, containment and recovery activities must **obtain existing qualifications** (City and Guilds 2078 or CITB Refrigerant Handling) which are acceptable until the Commission sets the minimum requirements and conditions for mutual recognition. Any new qualifications will be made mandatory at national level subsequently and transitional arrangements may be necessary to phase these new qualifications in over a number of years



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Article 4.2 – EU **sales of non-refillable containers** and non-confined direct evaporation systems are prohibited. Equipment cannot be first placed on the market after 4th July 2007 (first placing on the market might be wholesaler selling to retailer, so it is likely that some disposables filled before 4th July will still be available for a while after this date) Further details of the derogation in article 9(2) can be found in the regulation

### **ENFORCING THE REGULATION IN THE UK**

Meanwhile a UK consultation on the principles of enforcement and temporary arrangements for certification and training which will apply between July 4th 2007 and 4th July 2008 was issued on the DEFRA website earlier this year (<http://www.defra.gov.uk/corporate/consult/f-gas/index.htm>) and comments are invited by 14th August 2007. The ACRIB site has full details of the Regulation, Guidance for Users and a sample System Refrigerant Log and calculator at [www.acrib.org.uk](http://www.acrib.org.uk)

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Please rest assured that all Regal Environmental staff and engineers are familiar with the current situation: all engineers hold the required CITB Safe Refrigerant Handling certification and use all the appropriate equipment, as necessary, in order to fully comply with the above regulations.

In general, Regal's clients have light commercial systems that fall below the threshold of 3kg refrigerant charge per system (6kg if hermetically sealed). This would apply to all small split systems up to circa 14Kw nominal capacity for each system.

Regal clients with larger commercial VRV systems, chillers or large split systems which are above the 6kg threshold will be in possession of their required records of refrigerant in the Operating & Maintenance manuals provided, or by commissioning reports sheets issued after installation. Formal record logs will be provided if missing / lost or on equipment maintained but not supplied / installed by Regal. Charges will be applicable for the assessment and record logging in such cases.

Regal will contact any clients with specific needs in relation to their obligations under the new and emerging regulations on an ongoing basis, and will include annual leakage checks etc as appropriate and in accordance with the regulations. Obviously, charges at our published rates will apply to the additional work required in order to provide this service.

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