



Fgas Consultation Forum meeting

6 March 2018

AREA comments

Item 2: Standard setting for flammable refrigerants

- The CLP Regulation aligns the European Union system of classification, labelling and packaging of chemical substances and mixtures to the Globally Harmonised System (GHS). All flammable refrigerants except ammonia are classified as Extremely Flammable. This involves ATEX Product Directive and ATEX Worker Directive which are part of the national legislation in EU-countries and overrule the standards.
There is a need to update the [2003 guideline](#) on the ATEX Worker Directive, notably to address the installation of refrigeration plants and heat pumps with extremely flammable refrigerants according to CLP Regulation and both ATEX Directives.

Item 3: Information on training of personnel for the safe handling of alternative refrigerants

- Training needs are of growing importance and will eventually affect practically the entirety of the RACHP contractors' community. In the UK alone, an estimated 47,000 technicians will have to train. This will have a substantial financial impact on contractors, the vast majority of which are SMEs and even very small firms.
- National contractors' associations are making a lot of efforts to communicate on these needs to their members.
- Various initiatives are developing to provide a framework for the training of personnel
 - Further to the success of the REAL Alternative project, AREA is now involved in its successor, the *REAL Alternatives for LIFE Project* (project to be presented by Marco Buoni).
 - In the UK, ACRIB has set up top-up modules on flammables to complement the F-Gas certification.
- AREA members would welcome support from their national authorities in their efforts to promote the training of RACHP operatives
- AREA is now engaged in two international initiatives on competence of RACHP personnel:
 - The Refrigerant Driver's Licence, a refrigerant technician qualification program aimed at Article 5 countries
 - AREA is working together with UNEP on specifications for training schemes on alternative refrigerants in Article 5 countries.

Item 4: Information on the progress of the HFC phase-down

- Conscious of the importance of communication and the key role of contractors, AREA, EPEE, EFCTC and ASERCOM have joined forces to produce a clear and simple brochure explaining to RACHP contractors why they need to stop installing R-404A and R-507A and what alternatives are available.
- The uptake of alternatives to R404A has been gathering pace in recent months. In more AC based applications, the uptake of R32 has gathered pace as well and should be further developing with increased training.
- There is concern about the availability of R410A for larger AC applications and VRF/VRVs, where R32 or equivalent cannot be safely used. However, we hear that systems are still designed and priced even though there is no guarantee of availability of the gas.
- As regards alternatives:
 - Lack of availability and substantial price increases of (some) alternatives have been reported throughout the EU
 - There is a lot of uncertainty whether certain alternatives will eventually become commercially available, whether for patent or other reasons.
- Some concerns have been raised over used refrigerant recycling (lack of knowledge and facilities) and disposal (burden resting entirely on contractors & users).
- The combination of prices increases and availability issues creates a variety of concrete problems:
 - Challenge of making a quote because of the extreme volatility of refrigerant prices
 - Ability to install & maintain large AC systems and VRF/VRV sector of energy efficient heat recovery systems
 - Impossibility to service some applications either because of availability or cost, resulting in leaks
 - Risk of inappropriate retrofitting
 - Risk of unauthorised venting of used refrigerant into the atmosphere
 - Impossibility for users to change or retrofit their system because of availability or cost reasons
 - Some contractors have gone out of business and mentioned refrigerant price increases among the reasons
- Some discussions are ongoing in some Member States on whether and how some of these problems could be addressed. Can we do anything at EU level?
 - The European Commission could encourage Member States to increase control with plant owners that mandatory leak checks are duly carried out and that the provisions of Article 8 (Recovery) are respected when plants are decommissioned. Research in Norway shows that approximately 80 % of the emissions is gas leaking during lifetime, and 20 % comes from decommissioning without recovery of the gas.
 - AREA supports industry's demand regarding the quota for export of pre-charged equipment