

DELIVERY OF PRE-CHARGED SPLIT SYSTEMS:

A PRACTICAL GUIDE FOR DISTRIBUTORS AND END USERS

F gases are used as refrigerants in several types of products and appliances, such as in refrigeration, air-conditioning and heat pump equipment. Despite F gases having no ozone depletion potential, they are potentially powerful greenhouse gases with a global warming effect. Therefore, the F Gas Regulation (Regulation 517/2014/EC) aims to reduce emissions of these gases through a variety of measures: rules on containment, use, recovery and destruction, but also quantitative limits for the placing on the market of HFCs (phase-down).

The revised F Gas Regulation sets new requirements for delivery of fluorinated greenhouse gases: distributors have to perform a check. They need to ensure that the buyer of fluorinated greenhouse gases holds the appropriate certificate. As the gas included in split systems is covered by this quota limit, so the equipment containing that gas comes into scope of the requirements of the regulation itself.

There is also a requirement made upon end users, or "operators", of equipment in scope to ensure the person(s) installing and/or maintaining their equipment are properly qualified and certificated to do so.

This guide aims to provide practical guidance for distributors and re-sellers to help them fulfill their obligations both in the strictly legal and in the spirit of the Regulation. This guide is divided in two parts:

- a summary of the specific articles within the F gas Regulation spelling out the relevant sections extracted from the Regulation,
- and guidance for sellers of pre-charged split systems and end users as to what evidence of competence they are required to take as a screening measure.

EC517/2014: THE F GAS REGULATION

ARTICLE 6 RECORD KEEPING

1. Operators of equipment which is required to be checked for leaks pursuant to Article 4(1)¹, shall establish and maintain records for each piece of such equipment specifying the following information:

- a. the quantity and type of fluorinated greenhouse gases installed;
- b. the quantities of fluorinated greenhouse gases added during installation, maintenance or servicing or due to leakage;
- c. whether the quantities of installed fluorinated greenhouse gases have been recycled or reclaimed, including the name and address of the recycling or reclamation facility and, where applicable, the certificate number;
- d. the quantity of fluorinated greenhouse gases recovered;
- e. ***the identity of the undertaking² which installed, serviced, maintained and where applicable repaired or decommissioned the equipment, including, where applicable, the number of its certificate;***
- f. the dates and results of the checks carried out under Article 4(1) to (3);
- g. if the equipment was decommissioned, the measures taken to recover and dispose of the fluorinated greenhouse gases.

2. Unless the records referred to in paragraph 1 are stored in a database set up by the competent authorities of the Member States the following rules apply: EN 20.5.2014 Official Journal of the European Union L 150/203

- a. the operators referred to in paragraph 1 shall keep the records referred to in that paragraph for at least five years;
- b. ***undertakings carrying out the activities referred to in point (e) of paragraph 1 for operators shall keep copies of the records referred to in paragraph 1 for at least five years.***

¹ Article 4(1) states that stationary refrigeration, air-conditioning and heat pump equipment containing more than 5 tonnes CO₂ tonnes equivalent of fluorinated greenhouse gases is in scope of the Regulation.

For systems containing R410A, for example, this means any system containing over 2.39kgs of gas charge after installation.
For systems containing R32 this means any system containing over 7.407kgs after installation.

² Article 2 defines an "undertaking" as "any natural or legal person who (amongst other consideration) "installs, services, maintains, repairs, checks for leaks or decommissions equipment that contains, or whose functioning depends upon, fluorinated greenhouse gases"; or who "is the operator of equipment that contains, or whose functioning relies upon, fluorinated greenhouse gases."

ARTICLE 11

RESTRICTIONS ON THE PLACING ON THE MARKET

4. For the purposes of carrying out the installation, servicing, maintenance or repair of the equipment that contains fluorinated greenhouse gases or whose functioning relies upon those gases for which certification or attestation is required under Article 10³, fluorinated greenhouse gases shall only be sold to and purchased by undertakings that hold the relevant certificates or attestations in accordance with Article 10 or undertakings that employ persons holding a certificate or a training attestation in accordance with Article 10(2) and (5).

5. **Non-hermetically sealed equipment charged with fluorinated greenhouse gases shall only be sold to the end user where evidence is provided that the installation is to be carried out by an undertaking certified in accordance with Article 10.**

Reference should also be made to the [REFCOM Practical Guide for Distributors](#) for more information about bulk gas sales, restrictions and protocols. Please refer to www.refcom.org.uk for more information.

WHAT EVIDENCE SHOULD I ASK FOR?

IDEALLY THERE ARE TWO DIFFERENT PIECES OF EVIDENCE YOU SHOULD CHECK:

- **Company F Gas Certificate:** These are issued by REFCOM to companies that can demonstrate they employ suitably qualified personnel and have sufficient quantities of properly calibrated equipment to carry out the work they are certified to carry out. It is important to note that there are different levels of certification and careful attention should be paid to the wording on the certificate. Some companies may only be certified to carry out leak checks, for example, or recovery of gas at decommissioning. For the purposes of installation the wording shall clearly state that the company named in the certificate is qualified to carry out “...**installation, commissioning, repair, maintenance or servicing, decommissioning...**”
- **Technician qualification:** There are two routes to F Gas qualification for technicians: BESA Training F Gas Certification, or City & Guilds. Technicians can, rather than having to carry around their A4 certificate all the time, apply for an ACRIB⁴ Skillcard. This is a wallet sized smart card that holds details of all the technician’s qualifications and skills.

WHOLESALE SCREENING FOR “END USER” PURCHASES

An end user wishing to purchase equipment pre-charged with fluorinated greenhouse gases must provide evidence that it will be installed by a competent person. An engineer purchasing pre-charged equipment on behalf of an end user may fall outside of this scope, but a retailer is entitled to request qualification evidence and refuse sale if they are concerned that an attempt is being made to circumvent installation by competent persons.



³ Article 10 refers to training and certification of natural persons, undertakings and entities involved in working with fluorinated greenhouse gases. It spells out which relevant standards are applicable. For further information on which qualifications and certifications are required please refer to www.refcom.org.uk

⁴ ACRIB is the Air Conditioning and Refrigeration Industry Board, a pan industry sector body representing the entire supply chain. Cards can be applied for online at www.acrib.org.uk