

EPEE's position on the Training and Certification Draft Implementing Act

I- EPEE's interpretation

EPEE's interpretation of the scope of the Training and Certification requirements in the F-Gas Regulation and the Implementing Act is as follows:

According to the Commission's draft Implementing Act, Certificates B and C are intended for natural persons seeking certification in all activities with alternatives, such as NH₃ and CO₂.

Nevertheless, according to article 2 of *Regulation (EU) 2024/573*, **installers exclusively working with alternatives do not fall in scope of the F-gas Regulation, and thus, do not need F-Gas certification.**

Article 2

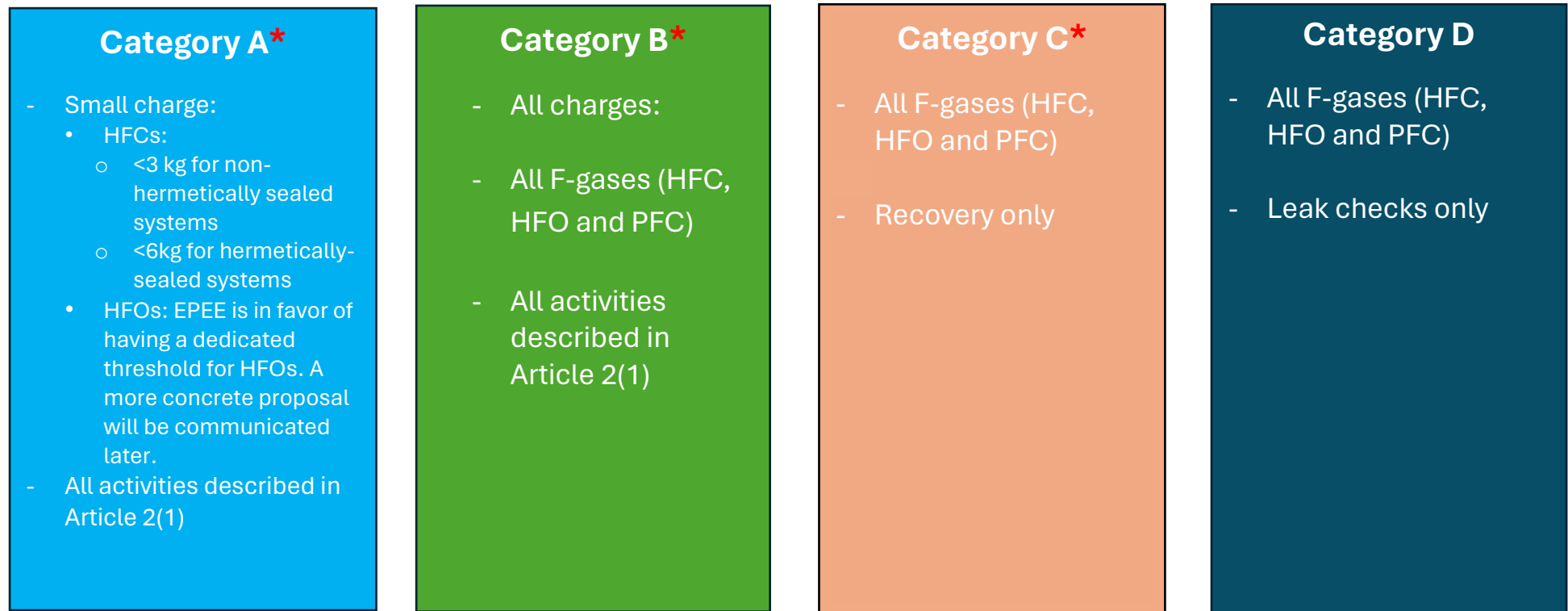
Scope

This Regulation applies to:

- (a) the fluorinated greenhouse gases listed in Annexes I, II and III, whether alone or as mixtures; and
- (b) products and equipment, and parts thereof, containing fluorinated greenhouse gases or whose functioning relies upon those gases.

Installers dealing with F-gases (either HFCs or HFOs) fall within the scope of the F-gas Regulation (*EU*) **2024/573**, and will additionally need to be informed about the necessity of education for safe and energy efficient handling of alternative refrigerants.

II- EPEE's proposed draft categories for certificates



➤ The structure proposed by EPEE above is divided into 4 categories:

- **Category A*:** EPEE highly recommends keeping a separate category for smaller systems (residential sector). This category is for installers tackling all activities of Art 2(1) (leak checks, installation, repair, maintenance or servicing and recovery) for F-gases. EPEE proposes to keep the same threshold for HFCs as in the current Implementing Act (EU) 2015/2067, i.e. 3kg for non-hermetically sealed systems and 6 kg for hermetically sealed systems. EPEE believes a dedicated threshold for HFOs would be necessary. We are currently discussing the appropriate threshold for HFOs and we will come back to DG CLIMA as soon as a proper proposal is consolidated.
- **Category B*:** is for all charges of equipment and all activities described in Article 2(1).
- **Category C*:** concerns the recovery of F-gases. It corresponds to the current category III, although extended to all F-gases.
- **Category D:** covers leak checks of systems using F-gases. It corresponds to the current category IV but extended to all F-gases.

- (*)The certificate categories A, B, C include the **safe handling of equipment containing flammable or toxic gases or operating under high-pressure or involving other relevant risks** according to Article 10 (5) e. of (EU)2024/573.

We would like to have further discussions on what this requirement on "safe handling" means, as it is necessary to avoid conflicts with qualification programmes already existing in Member States. Additionally, this requirement should not create a barrier for the uptake of alternatives.

Therefore, we believe the safe handling should include theoretical information, but not replace certifications already existing in Member States. Consequently, EPEE would like to have further discussion on the proposed tables, of the draft Annex of this draft implementing act, which contains the overview of Theoretical (T) and Practical (P) examination tests.

EPEE would like to remind that this certification is not a diploma; it is not possible to cover with the F-Gas certificate the skills required to install, troubleshoot, control, maintain and dismantle the diversity of refrigeration, air conditioning and heating systems.

Finally, EPEE would like to remind that the **employer must, already, among his legal obligations, take the necessary measures to ensure the safety and protect the health of workers**. Information, training and prevention actions for professional risks as well as appropriate means must be put in place by informing and training exposed employees. Examples of national requirements that already exists are the ATEX workplace directive, the pressure equipment directive, the Low Voltage and Machinery Directive. As well as voluntary programmes such as OHSAS, ISO.

About EPEE:

EPEE represents the Refrigeration, Air-Conditioning and Heat Pump industry in Europe. Founded in the year 2000, EPEE's membership is composed of over 50 member companies as well as national and international associations from three continents (Europe, North America, Asia). With manufacturing sites and research and development facilities across the EU, which innovate for the global market, EPEE member companies realize a turnover of over 30 billion Euros, employ more than 200,000 people in Europe and also create indirect employment through a vast network of small and medium-sized enterprises such as contractors who install, service and maintain equipment. Please see our website (<https://www.epeeglobal.org/>) for further information.