

Chapter 5: Contractors

Contractors must be certified and be aware of the provisions affecting operators to ensure compliance. In addition, as the HFC phase-down progresses, there will be a growing demand for European contractors trained to install, service, maintain, repair and decommission natural-refrigerant technologies. In order to take full advantage of these opportunities, contractors should make it a priority to familiarise themselves with natural-refrigerant technologies and seek training on their safe handling and use.

I. Prevention of HFC Emissions

Contractors are under a legal obligation to “take all precautionary measures to prevent leakage” of HFCs and blends,⁽¹²⁴⁾ and are prohibited from intentional releases, such as during leak testing.⁽¹²⁵⁾ In addition, any person using an HFC container immediately prior to its disposal must arrange for the recovery of the residual gases therein.⁽¹²⁶⁾

When assigning tasks to a third person, the contractor shall “take reasonable steps to ascertain that the latter holds the necessary certificates for the required tasks.”⁽¹²⁷⁾

II. Mandatory Certification Programmes and Training

Certified personnel carrying out certain tasks, and those undertaking such tasks for them, must be certified pursuant to a certification programme that includes training and an evaluation process (see Table 13).⁽¹²⁸⁾

Table 13:
Tasks Requiring
Certified Personnel

| Equipment | Installation, Servicing, Maintenance, Repair or Decommissioning | Leak Checks | Recovery |
|---|---|-------------|----------|
| Stationary Refrigeration Equipment | ✓ | ✓ | ✓ |
| Stationary Air-Conditioning Equipment | ✓ | ✓ | ✓ |
| Stationary Heat Pumps | ✓ | ✓ | ✓ |
| Stationary Fire Protection Equipment | ✓ | ✓ | ✓ |
| Refrigeration Units of Refrigerated Trucks and Trailers | ✓ | ✓ | ✓ |
| Electric Switchgear | ✓ | | ✓ |
| Stationary Equipment that Contains Solvents | | | ✓ |

For air-conditioning equipment in motor vehicles falling under Directive 2006/40/EC, it is only required that contractors and undertakings complete a relevant training course.⁽¹²⁹⁾

All certification programmes and training must also include information on natural refrigerants and the existing regulatory requirements for working with natural-refrigerant technologies.⁽¹³⁰⁾ In addition, training must be available to contractors wishing to update their knowledge on the applicable regulations and technical standards, to know the requirements pertaining to the containment, recovery and safe handling of equipment, or to receive information on relevant technologies to replace or reduce the use of HFCs and blends.⁽¹³¹⁾

Training certificates which were obtained under the previous regulation remain valid in accordance with the conditions under which they were originally issued.⁽¹³²⁾

III. Record Keeping

A. Required Information

Contractors must maintain records for each piece of equipment subject to leakage checks.⁽¹³³⁾ In particular, the records must specify for each piece of equipment:

- the quantities and type of HFCs installed;
- the quantities of HFCs added during installation, maintenance or servicing;
- the quantities of recycled or reclaimed HFCs used, including the name and address of the recycling or reclamation facility and, where applicable, the certificate number;
- the quantity of recovered HFCs used;
- the identity of the persons who installed, serviced, maintained, repaired or decommissioned the equipment, including, where applicable, their certificate number;
- the dates and results of the checks; and
- the measures taken to recover and dispose of the HFCs in the case of decommissioning.

Unless these records are maintained in a database set up by the national authorities of the EU Member State concerned, the records must be kept by certified personnel for at least five years and made available on request to national authorities or the European Commission.⁽¹³⁴⁾

B. Information on Purchasers

Contractors and wholesalers supplying HFCs must establish records with minimum information on the purchasers, in particular: (i) the certificate numbers of the purchasers, and (ii) the quantities of HFCs purchased. These records must also be maintained for at least five years.⁽¹³⁵⁾

Training in the Use and Safe Handling of Natural Refrigerants

Several associations provide training to contractors in the installation, service, maintenance, repair and decommissioning of natural-refrigerant technologies. These include, but are not limited to:

- European Association of Refrigeration, Air Conditioning and Heat Pump Contractors (AREA): <http://www.area-eur.be/>
- Real Alternatives Europe: <http://www.realskillseurope.eu/>
- Cool Concerns: <http://www.coolconcerns.co.uk/>

The United Nations Environment Programme (UNEP) has also produced a number of information fact sheets, including:

- Safe Use of HCFC Alternatives in Refrigeration and Air-Conditioning: Flammable Refrigerants⁽¹³⁶⁾
- Safe Use of HCFC Alternatives in Refrigeration and Air-Conditioning: Higher Pressure Refrigerants⁽¹³⁷⁾
- Safe Use of HCFC Alternatives in Refrigeration and Air-Conditioning: Higher Toxicity Refrigerants⁽¹³⁸⁾