

# TECHNICAL BULLETIN TB/046v2

## F-GAS PRODUCT PROHIBITIONS

EFFECTIVE 1st January 2022

### 1 OBJECTIVE

The objective of this technical bulletin is to inform members of the next steps in placing on the market bans coming into force on 1 January 2022 under the F-Gas Regulations.<sup>1</sup> It should be read in conjunction with TB046 published December 2019 as it is an update to that technical bulletin.

Further to the UK leaving the EU the regulations we currently work within remain exactly as they were scheduled to: phase down steps, service and product bans either in place or coming into force – all will continue as planned over the coming years.

Some of the product "placing on the market" prohibitions will have major implications for the sector, and it is essential that our members understand what these changes will mean for them.

### 2 PRODUCT PLACING ON THE MARKET BANS<sup>2</sup>

EC517/2014, Annex III sets out a timetable for various different sectors and uses of different refrigerants where the sale of these systems/applications becomes illegal after certain dates. For the purposes of clarity this technical bulletin shall only consider those prohibitions coming into place on 1 January 2022:

#### ANNEX III

#### PLACING ON THE MARKET PROHIBITIONS REFERRED TO IN ARTICLE 11(1)

Products and equipment Where relevant, the GWP of mixtures containing fluorinated greenhouse gases shall be calculated in accordance with Annex IV, as provided for in point 6 of Article 2		Date of prohibition
11. Refrigerators and freezers for commercial use (hermetically sealed equipment)	that contain HFCs with GWP of 2 500 or more	1 January 2020
	that contain HFCs with GWP of 150 or more	1 January 2022
13. Multipack centralised refrigeration systems for commercial use with a rated capacity of 40 kW or more that contain, or whose functioning relies upon, fluorinated greenhouse gases with GWP of 150 or more, except in the primary refrigerant circuit of cascade systems where fluorinated greenhouse gases with a GWP of less than 1 500 may be used		1 January 2022

## 3 WHAT THIS MEANS IN PRACTICE

**"Commercial use"** is defined in the regulations as meaning:

*"used for the storage, display or dispensing of products, for sale to end users, in retail and food services"*

In effect this includes every fridge, freezer, bottle display cooler, ice cream / sundae machine, ice machines, and more in every food outlet or store, including storage rooms in these stores and distributions centres because they will be selling directly to the consumer/end user.

REFCOM are aware of a number of premises where the use of any flammable substance is strictly prohibited, severely limiting the application of products conforming to this new requirement in practice because the limit to refrigerants with a GWP lower than 150 will almost always demand the use of refrigerants with a degree of flammability for this type of product. This issue has been raised with DEFRA and the HSE with a request for an explanatory note advising how this prohibition ban can be applied in these locations.

A system supplied with no refrigerant in it would not technically be subject to this prohibition ban, but DEFRA have said the supply of equipment with a holding charge of OFN with the intention of subsequently charging a refrigerant with a GWP above 150 would not be in the spirit of the regulations.

**"Multipack centralised systems"** are defined in Article 2 as meaning:

*"systems with two or more compressors operated in parallel, which are connected to one or more common condensers and to a number of cooling devices such as display cases, freezers or to chilled store rooms"*

The scope for these prohibitions are far reaching, right across the retail sector, but it is important to remember that the prohibitions are on products "placed on the market" and are not applied retrospectively.

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<sup>1</sup>EC517/2014, Article 13 and Annex III

<sup>2</sup>EC517/2014, Annex III

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