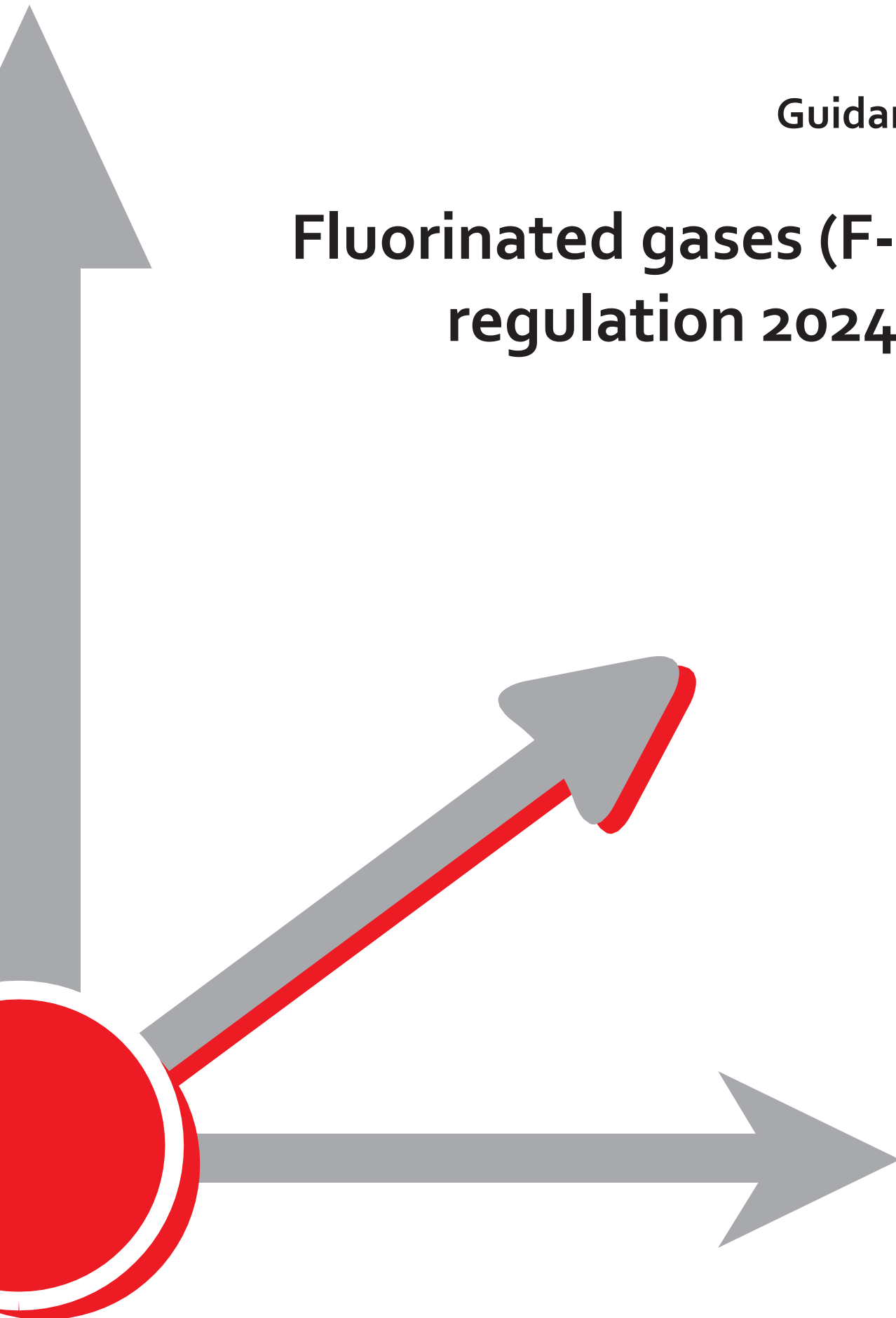


Guidance on

Fluorinated gases (F-gas) regulation 2024/573



Date	Rev #	Who?	Change
2025-01-17	V1		Initial release
2025-06-16	V2		Added information and corrections

TABLE OF CONTENTS

1 Introduction..... 3

2 Scope..... 3

3 What Has Changed 3

3.1 Chapter I: **General provisions**..... 3

3.2 Chapter II: **Containment**..... 4

3.3 Chapter III: **Restrictions and control of use** 5

3.4 Chapter IV: **Production schedule and reduction of the quantity of hydrofluorocarbons placed on the market** 6

3.5 Chapter VI: **Reporting and collection of emission data**..... 6

3.6 Annex III: Fluorinated greenhouse gases referred to in Article 2, point (a) (1) – fluorinated ethers, ketones and alcohols and **other fluorinated compounds** 7

Implementing regulation 2024/2174, other implications for labelling 8

Implementing regulation 2024/2195, other implications for reporting 8

Implementing regulation 2025/625, other implications for certificates for persons 8

FOREWORD

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1 Introduction

EU F-gas Regulation [2024/573](#), that amends Directive (EU) 2019/1937 and repeals Regulation (EU) 517/2014, has implications for the use of certain fluorinated greenhouse gases used in fire protection and in other applications. This Euralarm document only focusses on the implications for fire protection systems.



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REGULATION (EU) 2024/573 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL
of 7 February 2024
on fluorinated greenhouse gases, amending Directive (EU) 2019/1937 and repealing Regulation (EU)
No 517/2014

(Text with EEA relevance)

2 Scope

This Euralarm document provides guidance on the new EU F-gas Regulation [2024/573](#), that amends Directive (EU) 2019/1937 and repeals Regulation (EU) 517/2014. The below includes the wording, or a summary thereof, followed by the implications specifically pertaining to fire protection systems, and this document only focuses on the recent changes, not the full implications.

It includes the implications of the Implementation Regulations (EU) 2024/2174, labelling requirements, (EU) 2024/2195, reporting requirements and (EU) 2025/625, certificates of persons requirements.

3 What Has Changed

3.1 Chapter I: General provisions

Chapter 1 contains the General provisions. The following relates to fire protection systems.

3.1.1 Chapter I, Article 1: Subject matter

Article 1, Subject matter, which states: "This Regulation:

- (a) lays down rules on containment, use, recovery, recycling, reclamation and destruction of fluorinated greenhouse gases and on related ancillary measures, such as certification and training, which includes, the safe handling of fluorinated greenhouse gases and of alternative substances that are not fluorinated;
- (b) imposes conditions on the production, import, export, placing on the market, subsequent supply and use of fluorinated greenhouse gases, and of specific products and equipment containing fluorinated greenhouse gases or whose functioning relies upon those gases;
- (c) imposes conditions on specific uses of fluorinated greenhouse gases;
- (d) establishes quantitative limits for the placing on the market of hydrofluorocarbons;
- (e) establishes rules on reporting."

Implications: This has changed from 2014/517 by now including alternative substances in the subject matter; and for fire protection this now includes FK-5-1-12.

3.1.2 Chapter I, Article 2: Scope

The regulation Scope, article 2, states: "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."

Implications: None directly, but it clarifies what is covered, including the equipment.

3.2 Chapter II: Containment

3.2.1 Chapter II, Article 5: Leak checks

Chapter 2 focuses on Containment. Following on from Article 4, Prevention of emissions, Article 5 addresses Leak checks and clearly defines that operators *[means the undertaking exercising actual power over the technical functioning of products, equipment or facilities covered by this Regulation, or the owner designated by a Member State as being responsible for the operator's obligations in specific cases]* and manufacturers of any equipment containing over 5 metric tonnes CO₂ equivalent must be leak checked. Paragraph 2 point (c) citing fire protection equipment.

Paragraph 6 points (a), (b), & (c) then sets out the leak checking periods:

- (a) for equipment that contains less than 50 tonnes of CO₂ equivalent of fluorinated greenhouse gases listed in Annex I at least every 12 months; or where a leakage detection system is installed in such equipment, at least every 24 months; in the previous regulation this was stated as 5 to 50 tonnes CO₂ equivalent.
- (b) for equipment that contains 50 tonnes of CO₂ equivalent or more, but less than 500 tonnes of CO₂ equivalent of fluorinated greenhouse gases listed in Annex I at least every 6 months or, where a leakage detection system is installed in such equipment, at least every 12 months; this has not changed.
- (c) for equipment that contains 500 tonnes of CO₂ equivalent or more of fluorinated greenhouse gases listed in Annex I at least every 3 months or, where a leakage detection system is installed in such equipment, at least every 6 months. This has not changed.

Implications: None directly, but it clearly states that if the equipment contains more than 5 tonnes CO₂ equivalent it must be leak checked, but the periods have not changed; Article 5 Paragraph 6 point (a) is no lower than the previous 5-50 tonnes. While it is good practice for all fire protection equipment to be leak checked, these requirements apply to Annex I and Annex II, and do not include FK-5-1-12, which is in Annex III.

3.2.2 Chapter II, Article 7: Record keeping

Article 7 paragraph 4 now requires that records are kept, for at least 5 years of the equipment sold and for the certified installation companies it was sold to (i.e. installed by). This is linked to Article 11 (7) which required that F-Gases were only sold to certificated companies.

Implications: The qualifications and certification of installer companies needs to be verified before any equipment can be sold to them. Records must be kept for at least 5 years.

3.2.3 Chapter II, Article 8: Recovery and destruction

Article 8 paragraph 6 requires that any recovered fluorinated gases in Annex I and Annex II which is used for filling or refilling must be recycled or reclaimed. See definitions Article 3 (3.11 Recovery, 3.12 Recycling and 3.13 Reclamation).

Implications: Refilling is only possible using reclaimed or recycled HFCs. Use of new or recovered (without processing) HFCs is not allowed.

3.2.4 Chapter II, Article 10: Certification and training

Article 10 paragraph (1) establishes certification and training requirements including where relevant alternatives are used. Implementing Regulation (EU) 2025/625 identifies as such: perfluoro(2-methyl-3-pentanone), trifluoroiodomethane (trifluoromethyl iodide), and 2-bromo-3,3,3-trifluoroprop-1-en (2-BTP).

Implications: FK5-1-12 is now covered by the certification and training requirements.

Article 10 paragraph 8 States that the European Commission will by 12 March 2026 establish, by delegated acts, the minimum requirements for each of the activities. Those minimum requirements will specify, for each type of equipment referred to in paragraph 1, the required practical skills and theoretical knowledge, differentiating, where appropriate, between different activities to be covered, the arrangements of the certification or attestation as well as the conditions for mutual recognition of certificates and training.

Article 10 paragraph 9 introduces a refreshment period of 7 years by stating "Member States shall ensure that

certified natural persons are required to participate in refreshment training courses or complete an evaluation process referred to in paragraph 3, at least every 7 years” In addition it states that anyone trained under (EU) 517/2014 will have to undertake that training by 12 March 2029.

Implications: National training and certification schemes will need to be updated in line with any new requirements identified by the European Commission.

The qualifications and certification of installer companies trained under (EU) 517/2014 will need to be refreshed by 12 March 2029.

3.3 Chapter III: Restrictions and control of use

3.3.1 Chapter III, Article 11: Restrictions on placing on the market and sale

Article 11 (1) sets out the prohibitions on the sale of F-Gases, noting the specific wording of Annex IV (11) (c) which states 1st January 2025 for fire protection equipment that contain or rely on other fluorinated greenhouse gases listed in Annex I “except when required to meet safety requirements at the site of operation”

Implication: This states that new firefighting systems containing F-gases would be banned from 1/1/2025, noting that Annex I does include HFCs but does not include FK-5-1-12, and therefore FK-5-1-12 is not affected by a ban, whilst HFC-227ea is. However, the “except when required to meet safety requirements at the site of operation” is unclear. It could be this is determined by national regulators, as there is no guidance in the regulation in respect to this exception. PFCs and HFC-23 have earlier prohibition dates and are banned without exception. To be clear, as FK-5-1-12 is not included in Annex I, it is not subject to the ban affecting Annex I substances.

Article 11 (1) now sets out that maintenance and repair is allowed for the gases covered by the placing on the market restrictions providing they do not lead to:

- an increase in the capacity of the product or equipment;
- an increase in the amount of fluorinated greenhouse gas contained in the product or equipment; or
- a change in the type of fluorinated greenhouse gas used that would lead to an increase of the global warming potential of the fluorinated greenhouse gas used;

Implications: Provided the maintenance or repair does not lead to more F-Gas in the system, then existing systems can be maintained.

Article 11 (4) allows for refillable containers to be used where there is a binding process in place to return them.

Implications: Systems can be refilled provided there is a contract in place with the refilling operation.

3.3.2 Chapter III, Article 12: Labelling and product and equipment information

New paragraph 6 of Article 12 requires relabelling with updated information of refilled containers, where relevant

Implications: On refilling the label must show required information consistent with the refilling.

New paragraph 14 of Article 12 requires that when intended for destruction, export out of the EU, military equipment, etching/cleaning in the semiconductor industry or feedstock use an additional label stating “Exempted from quota under Regulation (EU) 2024/573 of the European Parliament and of the Council” has to be added.

Implications: New label to be considered if covered by one of these uses.

New paragraph 15 of Article 12 requires that when fluorinated gases are used under the safety requirements exception, a label needs to indicate this situation including the applicable safety requirement. Implementing Regulation 2024/2174 indicated that the text to be provided is as follows: ‘Prohibited to be operated, unless required by safety requirements that have to be applied at the site of operation’ followed by a reference to the applicable safety requirement that would make its use necessary

Implications: New label to be considered if covered by the exception

3.4 Chapter IV: **Production schedule and reduction of the quantity of hydrofluorocarbons placed on the market**

3.4.1 Chapter IV, Article 14: **Production of hydrofluorocarbons**

This new Article sets out the requirements for the production of HFC's and is in addition to the article on reduction in quantity of HFC's in the 2014 regulation.

Paragraph 1 of Article 14 states: "For the purposes of this Article, Article 15 and Annex V, the production of hydrofluorocarbons is the amount of hydrofluorocarbons produced minus the amount destroyed by technology approved by the Parties to the Protocol, and minus the amount entirely used as feedstock in the manufacture of other chemicals, but including hydrofluorocarbons generated as a by-product, unless not captured or unless that by-product is destroyed as part of or after the production process by the producer or handed over to another undertaking for destruction. No amount of reclaimed hydrofluorocarbons shall be considered in the calculation of the production of hydrofluorocarbons."

Implications: None, unless one is involved with the production of HFC's.

3.4.2 Chapter IV, Article 20: **F-Gas portal**

The Commission shall set up and ensure the operation of an electronic system for the management of the quota system, licensing requirements of imports and exports, and reporting obligations on fluorinated greenhouse gases (the 'F-gas Portal').

Implications: This is new control point for holding the data related to quota, so only relevant where organisations hold a quota.

3.5 Chapter VI: **Reporting and collection of emission data**

3.5.1 Chapter VI, Article 26: **Reporting by undertakings**

Article 26 (1) has extended to all fluorinated greenhouse gases the reporting obligations for producers, importers, exporters and undertakings receiving quota the reporting obligations. Paragraph 8 requires an independent auditor if quantities are more than 1000 tonnes CO₂ equivalent. Article 26(2) includes destruction. F Gas portal has to be used.

Implications: FK5-1-12 is included in the reporting obligations when more than 100 tonnes of CO₂ equivalent have been involved.

Article 26 (4) recording the amount of HFC's placed on the market, before reporting is required, has changed to 10 tonnes CO₂ equivalent for hydrofluorocarbons and 100 tonnes CO₂ equivalent for other fluorinated gases. Previously reporting it applied to 500 tonnes CO₂ equivalent of hydrofluorocarbons.

Implications: Minimum quantities have changed and also FK5-1-12 is now included in the reporting obligations when more than 100 tonnes of CO₂ equivalent are involved.

Article 26 (6) now adds a requirement to report when more than 1 tonne, or 100 tonnes CO₂ equivalent, is reclaimed for that calendar year. This includes FK5-1-12

Implications: This is a new requirement for FK5-1-12.

3.6 Annex III: Fluorinated greenhouse gases referred to in Article 2, point (a) (1) – fluorinated ethers, ketones and alcohols and **other fluorinated compounds**

Annex III now includes FK-5-1-12. This means that, whilst not subject to the restrictions and leakage requirements, it is now included in reporting, certification and training requirements and is recognized by the European Commission as related to F-Gas.

Implications: See explanations in each case.

Implementing regulation 2024/2174, other implications for labelling

Art 1 (2) clarifies that label affixed to product or equipment has to be legible at the time of placing in the market and as long it contains fluorinated gases, or the function of such product or equipment relies on them.

Implications: None, but worthy of note.

Art 1 (4) specifies that GWP values in Annexes of Regulation 2024/573 have to be used to determine the CO₂ equivalent information.

Implications: None, but worthy of note.

Art 1 (7b) allows to label as 100% Reclaimed for mixtures adding virgin substances to adjust the composition, where less than 10% of mass of the mixture is from virgin sources.

Implications: Only if mixtures are used.

Art 1 (7, a to h) Also precise wording may have changed but it should be verified for each language. Table in English:

Previous regulation 2015/2068/EU	New regulation 2024/2174/EU
100% Recycled	100% Recycled
100% Reclaimed	100% Reclaimed
For destruction only	Imported for destruction only
For direct export out of the EU only	For direct bulk export outside EU only
For use in military equipment only	For use in military equipment only
For etching/cleaning in the semiconductor industry only	For etching/cleaning in the semiconductor industry only
For feedstock use only	For feedstock use only
For MDI production only	For MDI production only

Implications: Verify if current labels align with the text required now by regulation in your language.

Implementing regulation 2024/2195, other implications for reporting

Tables contain more detailed information requirements now.

Implementing regulation 2025/625, other implications for certificates for persons

Art 2 (2) extends to 24 months (previously 1 year) the exemption of a certificate if the person is enrolled in a training course and is supervised by a person with a certificate who is fully responsible.

Implications: Minor. More flexibility to personnel.

All interim measures related to existing certification systems have been eliminated.

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