



## OBLIGATIONS FOR IMPORTERS OF EQUIPMENT CONTAINING FLUORINATED GREENHOUSE GAS UNDER THE EU F-GAS REGULATION

Following **EU regulation 514/2014** and subsequent implementation acts, companies importing equipment/products (e.g. refrigeration, air conditioning, heat pump equipment, ...) containing gases listed in Annex I and II of the F-gas Regulation exceeding 100 t CO<sub>2</sub> equivalent had to register, have the necessary authorisations to do so and annually report on imports via the dedicated F-portal for the first time by end of March 2018.

To support the accuracy and completeness of the information reported and consistency of the information with the annual reports submitted the regulator required **independent verification** by an **accredited verifier**. The verification report forms part of the **reporting obligations** to be completed **before the end of March**. Failure to do so may result in legal actions and fines.

For producers, importers and exporters of 'bulk gases' reporting and verification requirements are already in place since 2015.

To meet their obligations, **VERICO SCE** has performed more than 50 independent verifications for multiple clients across Europe. From major players to standalone SME's, we contributed assuring our client's legal compliance.

The fact that this was the first cycle of reporting, not all the stakeholders involved were up to speed or at the same level of understanding of the requirements and details of the F-gas regulation.

Underlying article is meant to **highlight some of the experiences** we came across this first year and take these **lessons** learnt to smoothen future reporting and verification within a tight schedule.

## WHAT ARE THE LESSONS LEARNT SO FAR:

### *Verification :*

- The regulation on importers requires **annual reporting and verification** to be performed **before the end of March** (similar date for verification of annual emission reports under the EU emission trading scheme). It was our perception that some importers discovered rather late they had obligations which resulted in late requests for verification. Availability of resources meant some clients could not be helped. **Upfront agreements** between the organisation and verifier on scope, boundary and planning of verification activities is a **prerequisite**.
- A **good understanding** of the complexity, the data flow (centralised/decentralised) activities, as well as the risks involved, is the **starting point** to develop a thorough risk analysis and subsequent sampling approach as the basis for the verification activities.

### *For the client :*

- Foresee **sufficient time** to prepare, gather necessary data and engage with a verifier at an early stage
- Appoint a **dedicated person** dealing with the F-gas regulation, supported within the organisation (e.g. finance, IT, ...)
- Gather the necessary **documentation** required in line with the F-gas regulation
- Where **logistic partners** are used, ensure **understanding** of the F-gas requirements and ensure (contractual) **agreements** on who is responsible for maintaining necessary documentation as part of the requirements
- Ensure the necessary **quality assurance** and **control processes** to prevent misstatements, data gaps, missing documentation
- In addition to the **correct labelling** the internal documentation must show the **quantity of hydro fluorocarbons (HFC's)** in each unit rounded to the nearest gram as well as information on how equipment used for determining quantities is maintained and calibrated.

### *For the logistics provider :*

- Ensure **knowledge** of the F-gas requirements
- Agree on **information gathering** with the client
- Ensure **availability of relevant persons** in consultation with the client/verifier

### *For the regulator :*

- **Invest in necessary resources**, well up to speed with the F-gas regulations. In certain jurisdictions the team (or person) is the same team, or the person engaged in EU ETS activities, hence fully stretched
- Ensure a **good overview** of entities that have reporting obligations under the F-gas regulation
- To address questions development of an **FAQ** or temporarily instalment of a **Helpdesk** might be useful
- To ensure correctness of reported data, providing the verifier with **authorisation** to confirm uploaded information in the F-gas portal might be useful

### *For customs :*

- **Customs data** is relevant as auditable evidence for Third Party verification of annual F-Gas Reporting
- **Automated customs systems** do **NOT** use the form described in the regulation.

## CONCLUSION

Do not get confused with F-Gas reporting requirements and suitable auditable evidence. If you feel uneasy with the correct interpretation of the EU F-Gas regulation, conform reporting and the BDR reporting tool or consider to change your verifier, **please contact** us [@Verico.eu](https://twitter.com/Verico.eu)

We are in a position to make an **offer** for those who are still unsure about how to meet the **next deadline** for submission of **verification reports** by the **end of March 2019**.



## SOME QUOTES FROM OUR SATISFIED CUSTOMERS

### Samsung

*"We highly value the support we received from **Verico** in the preparation phase and during the audit itself. A pragmatic approach was proposed to overcome some unforeseen obstacles, however keeping fully in mind the requirements of the verification process. The lessons learned have been shared between both parties in an open and constructive atmosphere."*

**M. Xavier FEYS, Vice President** - Pre Sales & Customer Service

**Samsung Electronics Air Conditioner Europe B.V.**

### Daikin

*"In 2015 the quota-related EU F-gas reporting was new for every market player including the verification companies. With the purchase of the Solvay refrigerant activities in 05/2015 Daikin Chemical Europe became one of the major F-gas quota holders in the EU. Under these extraordinary circumstances with a change of ownership of reference values and related quotas, we appreciated the professional understanding of this unique situation and the solution-focused way of handling all issues by **Verico**. Since then Daikin Chemical and affiliates have a trustful business relation with Verico in the field F-gas reporting and verification acc. the EU517/2014."*

**M. Felix FLOHR, Technical Service Manager**  
Regulatory Specialist Refrigerants

**Daikin Refrigerants Europe GmbH**

### Suntec

*"Despite lack of time, the verification went quickly and smoothly, the consultation and support were highly competent, which is especially important for legally relevant topics. We recommend **Verico** with a good conscience to everybody, who wants to be guided by qualified and experienced hands!"*

**Mrs. Alona PINDUS, Einkauf / purchase**

**Suntec Wellness GmbH, Düsseldorf**

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