

## FREQUENTLY ASKED QUESTIONS for EPA LICENSED SITES: ODS & F-Gas – January 2026

### Q1. Is there a glossary of F-Gas key terms and definitions?

To aid with understanding, the EU Commission has listed definitions of key terms and definitions used in F-Gas policy and regulation: [Glossary for F-gas policy - Fluorinated Greenhouse Gases – Climate Action](#).

### Q2. Why do I need to provide information on ODS & F-Gas to the EPA?

The EPA are the responsible body for the enforcement of Ozone Depleting Substances (ODS) Regulations ([EU No. 2024/590](#)) and Fluorinated Greenhouse Gases (F-Gas) Regulations ([EU No. 2024/573](#)) for both EPA licensed sites and non-EPA licenced sites.

### Q3. What are the key requirements for compliance with the ODS & F-Gas Regulations:

The following table summarises many of the key requirements for ODS and F-Gas compliance:

Requirement Obligation:	How to Comply:
<b>1. Phase Down</b>	If your equipment runs on F-gas make sure you are aware of, and ready for, F-gas Phase Down (in force since 1st January 2015) and the Service and Maintenance Ban (from 1st January 2020)
<b>2. Prevent Emissions</b>	Prevent the intentional release of F-gases from equipment
<b>3. Leak Checks</b>	Have your systems checked for leaks and get them repaired. How often you must check your systems depends on the quantity of ODS or F-Gas refrigerant installed in the equipment.
<b>4. Qualifications</b>	The people working on your systems must be qualified to handle F-Gases/ODS where required. The company they work for must also be certified with F-Gas Registration Limited. F-Gas Registration Limited is the certification company established in Ireland to issue company certificates. This company certificate demonstrates that qualified technicians are in their employment and you should ensure they have a valid company certificate (these are time limited and so must be regularly checked). Contractor company certificates can also be issued by a certification body in another Member State of the European Union and are mutually recognised in Ireland.
<b>5. Labelling</b>	Prior to equipment being placed on the market it must be labelled with specified information.

<b>6. Comply with the ODS Ban</b>	Comply with the ODS ban which is in place since 1st January 2015. You may not add any ODS to equipment during servicing. At this point, the refrigerant gas in the system would either have to be replaced with an alternative gas or the whole system has to be replaced with an alternative system.
<b>7. Hazardous Waste.</b>	Make sure any waste gas taken from your systems is recovered properly and treated as a hazardous waste.
<b>8. Keep Records</b>	Keep written records, where required, to prove you <ul style="list-style-type: none"> <li>• have complied with the regulations. Minimum record requirements are set forth in Article 7 of the F-Gas Regulation;</li> <li>• used certified people to install, maintain, repair, service, decommission and leak check equipment; and,</li> <li>• managed your waste legally.</li> </ul>

#### **Q4. What personal qualifications/certificates do I need for managing ODS and F-Gas?**

The F-Gas Regulation sets forth F-Gas handling certification/attestation requirements for persons handling F-gases and the same certification is acceptable for handling ODS - any exceptions or additional requirements are listed in Irish implementing regulations.

Different certification types and levels are specified depending on the specific equipment type and the nature of activity being undertaken. In future, training will have to also consider alternative refrigerant gases (hydrocarbons, ammonia, CO<sub>2</sub>). Individuals recovering fluorinated greenhouse gas-based solvents from equipment shall hold a certificate. Appendix 1 below provides further detail.

#### **Q5. Where can I obtain F-Gas personal qualifications/certificates**

To obtain the appropriate certificate, you will need to undertake training with an approved training provider and pass an exam. In Ireland, training providers must be approved by [Quality and Qualifications Ireland \(QQI\)](#). F-Gas personal qualifications/certificates awarded in other EU Member states are mutually recognised in Ireland.

#### **Q6. Is my existing personal F-Gas handling certificate/attestation still valid?**

Existing certificates and training attestations issued in accordance with the previous F-gas Regulation (EU No 517/2014) remain valid, in accordance with the conditions under which they were originally issued (Article 10(9), F-Gas Regulation) for the time being. This also applies to personal F-Gas handling certificate/attestation issued under the original F-gas Regulation (EC No 842/2006).

In future, all F-Gas handling certificate/attestation holders, including those certified under previous iterations of the F-Gas Regulation, will have to participate in refreshment training courses or complete an evaluation process no later than 12 March 2029, and then repeat this process at least every 5-7 (depends on course) years. The arrangements for this have yet to be established in Ireland but must be in place by 12 March 2027.

Since 2021, due to BREXIT, UK F-Gas and ODS awards are no longer recognised in the EU. For example, City & Guilds certificates are no longer valid in the EU – a valid Irish or EU compliant certificate is required.

#### **Q7. When is F-Gas Company Certification required?**

Companies (including sole traders) must hold F-Gas Certification if they undertake tasks for other parties on the following categories of F-Gas containing equipment for which personnel must be F-Gas handling certified:

- stationary refrigeration, air conditioning and heat pump equipment;
- refrigeration units of refrigerated trucks (>3.5 tonnes) and trailers;
- stationary fire protection equipment;
- Organic Rankine Cycles, and
- Electrical switchgear.

Please note that mobile air conditioning requirements are not included in the above list and have separate requirements.

F-gas Registration Ltd provides Company F-Gas certification in Ireland and maintains a public register of certified companies.

Equipment operators shall only engage an undertaking to perform relevant tasks for which F-gas certification, if they hold the necessary certificate (A.10, F-Gas Regulation).

- If an inhouse person is used, the person must hold the appropriate F-Gas handling certificate/or attestation.
- If a third-party contractor is used, they must hold an appropriate F-Gas company certificate. This can be checked, if registered in Ireland, at F-gas Registration Ltd.

A valid company certificate issued by a certification body in another Member State of the European Union is mutually recognised in Ireland.

#### **Q8. Am I required to undertake mandatory leak checking of equipment?**

The intentional release of F-Gases into the atmosphere, where such release is unlawful, is a serious infringement of the F-Gas Regulation and is prohibited. Operators and manufacturers of equipment are obliged to prevent leakage of F-Gases to the extent possible, including thorough checking of the most relevant equipment for leaks.

Therefore, operators and manufacturers of specified equipment containing fluorinated greenhouse gases listed in Annex I or Annex II above specified thresholds shall ensure that the equipment is checked for leaks at least as often as the frequencies specified in the F-Gas Regulation. This requirement can be referred to as mandatory leak checking. It is undertaken for the purpose of proactively minimising leaks of F-Gases. Mandatory leak checking does not apply to foams containing F-Gases.

The EPA also recommends that leak checking is done at least annually on non-hermetically sealed equipment containing fluorinated greenhouse gases listed in Annex I or Section 1 of Annex II beneath the specified thresholds for mandatory leak checking.

Refer to Article 5 of (EU) No. 2024/573 for F-gases and Article 21 of the ODS Regulation (EU) 2024/590.

#### **Q9. Am I required to undertake any other leak checking of equipment?**

Leak checking must also be undertaken when equipment is installed and after a leak repair has been undertaken.

Please note that the 2024 Regulations now require verification leak checking. Article 4, section 5 of Regulation (EU) 2024/573 (the F-Gas Regulations) states that “Where the equipment is subject to leak checks under Article 5(1) and a leak in the equipment has been repaired, the operators of the equipment shall ensure that the equipment is checked by a natural person who is certified in accordance with Article 10 at the earliest after an operating time of 24 hours has elapsed but not later than 1 month after the repair to verify that the repair has been effective.”

Where records submitted to the EPA refer to a leak of a certain item of equipment for example, the Licensee is required to demonstrate that the verification leak check was undertaken in accordance with the regulations.

#### **Q10. What type of equipment requires mandatory leak checks?**

Mandatory leak check requirements apply to operators and manufacturers of Stationary or Mobile equipment as follows:

<u>Stationary Equipment</u>	<u>Mobile Equipment</u>
a. Refrigeration equipment b. Air-conditioning equipment c. Heat pumps d. Fire protection equipment e. Organic Rankine Cycles f. Electrical switchgear**	a. Refrigeration units of refrigerated trucks and refrigerated trailers b. Refrigeration units of refrigerated light-duty vehicles, intermodal containers, including reefers, and train wagons* c. Air-conditioning equipment and heat pumps in heavy duty vehicles, vans, non-road mobile machinery used in agriculture, mining and construction operations, trains, metros, trams and aircraft*

\* Please note the requirements in mobile equipment types for (b) and (c) do not come into force until 12 March 2027.

\*\* Electrical switchgear does not require mandatory leak checks provided that it complies with one of the following conditions:

- it has a tested leakage rate of less than 0.1 % per year as set out in the technical specification of the manufacturer and is labelled accordingly;
- it is equipped with a pressure or density monitoring device with an automatic alert system while in operation;
- it contains less than 6 kilograms of fluorinated greenhouse gases listed in Annex I.

#### **Q11. How often am I required to undertake mandatory F-Gas leak checks?**

The frequency of mandatory F-Gas leak checking is determined by the quantity F-Gas the equipment contains when it is fully charged. Quantity for this purpose is listed in either tonnes carbon dioxide equivalent (tCO<sub>2</sub>eq) or kilograms as summarised in the following tables.

Table 1. Mandatory F-Gas Leak Checking Frequencies for Annex I F-gases

Quantity of gas (tCO <sub>2</sub> eq) for Annex I F-gases *	F- gas Mandatory Leak Checking Frequency	
	No leak detection equipment fitted	Leak detection equipment fitted
≤ 5 or ≤10 if hermetically sealed	None	None
5 to 50	12 monthly	24 monthly
50 to 500	6 monthly	12 monthly
≥ 500	3 monthly	6 monthly

Table 2. Mandatory Leak Checking Frequencies for Annex II (Section I) F-gases

Quantity (kg) for Annex II (Section I) F-gases *	F- gas Mandatory Leak Checking Frequency	
	No leak detection equipment fitted	Leak detection equipment fitted
≤ 1 or ≤2 if hermetically sealed	Not Required	Not Required
1 to 10	12 monthly	24 monthly
10 to 100	6 monthly	12 monthly
≥ 100	3 monthly	6 monthly

\*Mandatory leak checking, as listed in Table 1 and 2 above, is not required for hermetically sealed equipment installed in residential buildings where that equipment contains less than 3 kilograms of F-Gases, provided the equipment is labelled as hermetically sealed.

**Q12. How often am I required to undertake mandatory ODS leak checks?** The frequency of mandatory ODS leak checking is determined by the quantity ODS the equipment contains when it is fully charged.

Table 3. Mandatory Leak Checking Frequencies for ODS

Mandatory Leak Checking Frequency	Refrigerant charge for non-hermetically sealed systems (kg)	Refrigerant charge for hermetically sealed systems (kg)
Not required	< 3	< 6
12 monthly	3 to 30	6 to 30
6 monthly	30 to 300	30 to 300
3 monthly	≥ 300	≥ 300

**Q13. Do I need to leak check when I install new equipment containing F-Gases?**

Newly installed and charged equipment must also be checked for leakage immediately after they have been put into service (A.7, Commission Regulation (EC) No 1497/2007).

**Q14. Is there further instruction on leak checking?**

Yes, the following should be applied:

- [Commission Regulation \(EC\) No 1516/2007](#) provides standard leakage checking requirements for F-gas containing refrigeration, AC and heat pump equipment.

- [Commission Regulation \(EC\) No 1497/2007](#) provides standard leakage checking requirements for stationary fire protection systems containing certain fluorinated greenhouse gases

#### **Q15. Do I need to maintain equipment records**

If mandatory leak checking is required for an item of equipment, then associated mandatory records must also be maintained in accordance with Article 7 of the F-Gas Regulation and Article 21 of the ODS Regulation. This is relevant for EPA licensed sites and non-EPA Licensed sites and these mandatory records must be maintained on site for inspection by the EPA for at least five years.

While mandatory records for equipment below the mandatory leak checking thresholds are not required, the EPA considers it best practice to keep records for such equipment nonetheless.

#### **Q16. What must I do if I find an F-Gas or ODS Leak?**

- Where a leakage of fluorinated greenhouse gases is detected, it should be repaired without undue delay.
- Where the equipment is subject to mandatory leak checks and a leak in the equipment has been repaired, the operators of the equipment shall ensure that the equipment is checked to verify that the repair has been successful (i.e verification leak check).
- For mobile equipment (as listed in Article 5(3) of the F-Gas Regulation), a leak repair verification check may be carried out directly after a repair.
- Where the equipment is subject to mandatory leak checks, a mandatory record of the leak, its repair and subsequent leak repair verification leak check must be recorded.
- If the quantity of ODS/F-Gas leaked is above the incident reporting threshold specified by the EPA, it must be reported as an incident through EDEN.

#### **Q17. If I find a leak, do I need to report it to the EPA?**

- Only leaks above the following thresholds are required to be reported as incidents to the EPA: ODS leaks:
  - >3kg, or >6kg if hermetically sealed.
- F-Gas leaks:
  - ≥5 tCO<sub>2</sub> eq, or ≥10tCO<sub>2</sub> eq if hermetically sealed for Annex I F-Gases.
  - ≥1 kg, or ≥2kg if hermetically sealed for Annex II (Section 1) F-Gases

#### **Q18. How do I report a leak to the EPA?**

Leaks above the thresholds listed above should be notified as incidents to the EPA as soon as possible following detection via [www.EDENireland.ie](http://www.EDENireland.ie). The Licensee shall complete the incident reporting excel when submitting an incident relating to F-Gas emissions. A link to this excel can be found here: [ODS & F-Gas Incident notification template | Environmental Protection Agency](#).

This spreadsheet should serve as a rolling log and all reportable incidents should be recorded in a single excel spreadsheet. This spreadsheet is required to be submitted in conjunction with each individual incident notification as it occurs.

**Q19. What information should I report in an incident notification for an ODS/FGas leak to the EPA?**

The following information shall be submitted in an incident notification to the EPA:

- a. Equipment name, location and unique identifier (asset number/MSN).
- b. The cause of the leak (if known) or details of investigation findings.
- c. The type and quantity of ODS/F-Gas installed in the equipment when fully charged
- d. The quantity of ODS/F-Gas that leaked from the equipment.
- e. The date of detection.
- f. Where the leak occurred in the equipment.
- g. How the leak was detected.
- h. Confirmation that the leakage of ODS/F-Gas was minimised after detection of the leak.  
This typically involves recovering any remaining ODS/F-Gas from the equipment and transferring it to a suitable cylinder for storage pending repair of the leak.
- i. A copy of leak check records relating to the equipment for the previous 24 months. A summary of these leak checks may be acceptable.

**Q20. What other information should I know?**

- High GWP F-gases are recommended to be replaced with low GWP F-gases or non-F-gas alternatives where possible.
- Ensure all ODS/F-Gas containing equipment is labelled.
- Ensure that all equipment containing ODS or F-Gas is appropriately decommissioned. In all cases, the first step in decommissioning the equipment is to recover any remaining refrigerants from the equipment into appropriate cylinders so as to prevent accidental release.
- The use of ODS refrigerants (e.g. R22) for service and maintenance is now banned. Once equipment reaches end of life it must be decommissioned and the refrigerants managed as hazardous waste. If it leaks, it can no longer be topped up.

**Useful Links:**

- Additional guidance and templates are available on the EPA website: <https://www.epa.ie/our-services/compliance--enforcement/air/fluorinated-greenhouse-gases-f-gases/ods-and-f-gas-reporting-licensed-sites/>
- F-gas regulation: <https://eur-lex.europa.eu/eli/reg/2024/573/oj>
- F-gas Regulation information: <https://www.complianceandrisks.com/blog/regulation-eu-2024-573-european-commission-adopts-new-f-gas-regulation/>
- ODS regulation: <https://eur-lex.europa.eu/eli/reg/2024/590/oj>
- ODS Regulation summary (European Commission): [https://climate.ec.europa.eu/eu-action/ozone-layer/overview\\_en](https://climate.ec.europa.eu/eu-action/ozone-layer/overview_en)

For any other queries please contact [fgases@epa.ie](mailto:fgases@epa.ie) or [ods@epa.ie](mailto:ods@epa.ie).

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### Appendix 1 – Excerpt from European Commission

	Installation, maintenance, servicing, repair, decommissioning (Article 4)		Leak checks (Article 5)		Recovery (Article 8)	
<b>Stationary</b>	Natural persons	Legal persons	Natural persons	Legal persons	Natural persons	Legal persons
<b>Refrigeration</b>	Annex I, II/1 +alternatives	Annex I, II/1 +alternatives	Annex I, II/1	-	Annex I, II and III	-
<b>AC and HP</b>	Annex I, II/1 +alternatives	Annex I, II/1 +alternatives	Annex I, II/1	-	Annex I, II and III	-
<b>Fire protection</b>	Annex I, II/1 +alternatives	Annex I, II/1 +alternatives	Annex I, II/1	-	Annex I, II and III	-
<b>Rankine Cycles</b>	Annex I, II/1 +alternatives	Annex I, II/1 +alternatives	Annex I, II/1	-	-	-
<b>Switchgear</b>	Annex I, II/1, III +alternatives	-	-	-	Annex I, II and III	-
<b>Solvent</b>	-	-	-	-	Annex I, II and III	 European Commission

	Installation, maintenance, servicing, repair, decommissioning (Article 4)		Leak checks (Article 5)		Recovery (Article 8)	
<b>Mobile-Refrigeration</b>	Natural persons	Legal persons	Natural persons	Legal persons	Natural persons	Legal persons
<b>Trucks and trailers</b>	Annex I, II/1	Annex I, II/1	Annex I, II/1	-	Annex I, II and III	-
<b>Light duty vehicles</b>	Annex I, II/1	Annex I, II/1	Annex I, II/1	-	Annex I, II and III (attestation)	-
<b>Intermodal containers (incl. reefers)</b>	Annex I, II/1	Annex I, II/1	Annex I, II/1	-	Annex I, II and III (attestation)	-
<b>Train wagons</b>	Annex I, II/1	Annex I, II/1	Annex I, II/1	-	Annex I, II and III (attestation)	-

	Maintenance, servicing, repair (Article 4)		Leak checks (Article 5)		Recovery (Article 8)	
	Natural persons	Legal persons	Natural persons	Legal persons	Natural persons	Legal persons
<b>*Mobile AC/HP</b>						
<b>All road vehicles (incl. MAC)</b>	Annex I, II and III (attestation)	-	-	-	Annex I, II and III (attestation)	-
<b>Heavy duty vehicles</b>	Annex I, II and III (attestation)	-	Annex I, II/1 (attestation)	-	Annex I, II and III (attestation)	-
<b>Vans</b>	Annex I, II and III (attestation)	-	Annex I, II/1 (attestation)	-	Annex I, II and III (attestation)	-
<b>Non road machinery</b>	Annex I, II and III (attestation)	-	Annex I, II/1 (attestation)	-	Annex I, II and III (attestation)	-
<b>Trains, metros, trams</b>	Annex I, II and III (attestation)	-	Annex I, II/1 (attestation)	-	Annex I, II and III (attestation)	-
<b>Aircraft</b>	Annex I, II and III (attestation)	-	Annex I, II/1 (attestation)	-	Annex I, II and III (attestation)	-

	Installation, maintenance, servicing, repair, decommissioning (Article 4)		Leak checks (Article 5)		Recovery (Article 8)	
	Natural persons	Legal persons	Natural persons	Legal persons	Natural persons	Legal persons
<b>Foams and other products and equipment</b>	-	-	-	-	Annex I, II/ Appropriately qualified personnel	-