



Statement on the

EU Commission's implementing regulation establishing minimum requirements for training attestations and the conditions for the mutual recognition of such training attestations as regards mobile equipment containing fluorinated greenhouse gases

Joint statement by the organizations

**Landesinnung Kälte-Klima-Technik Hessen-Thüringen/Baden-Württemberg (LIK)
Verband Deutscher Kälte-Klima-Fachbetriebe (VDKF)**

Bonn/Maintal, 13.10.2024 – The VDKF and LIK organizations, as the national German trade association for the German refrigeration and air conditioning industry (VDKF) and as the certification body according to the F-Gas Regulation (LIK), are jointly commenting on the above-mentioned implementing regulation. We fully support the main objective of the F-Gas Regulation, which is to further reduce emissions of greenhouse gases. Therefore, we are critical of several aspects of the implementing regulation, because, in our view, the requirements for personnel who may carry out maintenance, servicing or repair of mobile heat pumps and air conditioning systems are, on the one hand, not broad enough; on the other hand, some people are unnecessarily overburdened.

Special requirements for work on passenger cars and light commercial vehicles

Persons who have previously carried out work on mobile air conditioning systems in passenger cars and light commercial vehicles, which are regulated in EU Regulation 2006/40/EC, require only a relatively simple training course with a small amount of content that is sufficient for the target group and the required activities. In the new implementing regulation, the minimum requirements for persons for work on the above-mentioned vehicle types are treated together with those in other vehicle types (heavy-duty vehicles, mobile machinery in mining and agriculture, trains, underground railways and trams) and combined into one group. In this context, the training requirements and contents have been significantly expanded. In our view, this raises two problems:

- In order to obtain a training certificate for a person who carries out work on mobile air conditioning systems in passenger cars and light commercial vehicles, in the future they will have to learn a lot of content that goes beyond the knowledge that is actually needed and that will only have to be applied in absolutely exceptional cases in daily practice, e.g. in automotive workshops. In order not to unnecessarily burden this group of people with training, separate requirements for passenger cars and light commercial vehicles should be introduced.
- If there is no differentiation, in the future persons who in their daily work deal exclusively with passenger cars and light commercial vehicles may also work on systems that have large refrigerant charges, the handling of which requires special knowledge for technical and environmental reasons. This knowledge can only be maintained after participating in a training course if it is also applied in everyday work, which is not to be expected in car repair shops. Therefore, separate requirements for cars and light commercial vehicles should be introduced for this reason as well.



LANDESINNUNG

KÄLTE - KLIMA - TECHNIK
HESSEN-THÜRINGEN/BADEN-WÜRTTEMBERG



Review of training content

In order to receive a certificate for work on stationary refrigeration and air conditioning systems, persons must complete appropriate training and demonstrate the knowledge acquired in an examination to ensure that they really do have all the knowledge needed to avoid the emission of greenhouse gases. The same does not apply to obtaining a training certificate for work on mobile air conditioning systems. Here, participation in a training course without an examination is sufficient. This may be considered sufficient for work on air conditioning systems in passenger cars and light commercial vehicles. However, this does not apply to the newly added mobile applications. Many of these mobile air conditioning systems are absolutely comparable to stationary systems in terms of size, performance and refrigerant charge. It is therefore not comprehensible why, in this case, a training certificate without a test of the knowledge acquired is sufficient. As described above, separate requirements should therefore be introduced for work on air conditioning systems and heat pumps for passenger cars and light commercial vehicles, and a training certificate that can be obtained without a test, and for the other applications, further requirements and a mandatory test. This is relevant both for reasons of climate protection and to avoid emissions of greenhouse gases, and for reasons of operational safety and personal protection, because in addition to fluorinated refrigerants, alternative (flammable) refrigerants are now also regulated in the implementing regulation.

Recognition of existing certificates

Persons who hold a valid certificate (A1) according to the Implementing Regulation 2024/2215 or a certificate according to Cat. I DVO 2015/2067 for activities on stationary refrigeration and air conditioning systems should automatically also be allowed to carry out work in connection with mobile air conditioning applications. The A1 certificate already covers all – and even more – knowledge.

Contact:

Christoph Brauneis, christoph.brauneis@vdkf.de, 0049 1520 2006037

VDKF – German Association of Refrigeration and Air Conditioning Companies

Over 1,000 member companies from the skilled trades, industry and commerce are organized in the VDKF, representing more than 40,000 employees and a sales volume of over 6.8 billion euros per year. VDKF has been the leading German trade association for the refrigeration, air conditioning and heat pump industry and a partner of the refrigeration plant engineering trade since 1962. As a trade association, the range of services provided by the association extends from representing the interests of its members vis-à-vis government agencies, authorities and organizations, to addressing economic policy issues, promoting the exchange of ideas between experts, and providing a comprehensive range of services and information. www.vdkf.de

LIK – State Guild of Refrigeration and Air Conditioning Technicians for Hesse, Thuringia and Baden-Württemberg

The LIK is responsible for the refrigeration and air conditioning companies in Hesse, Thuringia and Baden-Württemberg. The State Guild is also certification body according to the F-Gas Regulation and the sponsor of the Federal College of Refrigeration and Air Conditioning Technology in Maintal, Harztor / Niedersachswerfen and Leonberg, as well as the European Academy of Refrigeration, Air Conditioning and Ventilation (ESaK).

www.landesinnung-kaelte-klima.de