

Department for Environment, Food and Rural Affairs

# Guidance for Fire Protection Sectors

## Guidance: F Gas and Ozone Regulations

### Information Sheet FP 4: Getting Started

April 2012

#### Contents

Step 1	Identify general scope of obligations .....	1
Step 2	Allocate director level and operational responsibilities .....	1
Step 3	Establish an inventory of relevant equipment .....	2
Step 4	Set up a record keeping system .....	2
Step 5	Ensure leak test obligations are being met .....	2
Step 6	Ensure automatic leak detectors are fitted .....	2
Step 7	Use records to identify recurring problems .....	2
Step 8	Only use appropriately qualified personnel .....	3
Step 9	Company verification .....	3
Step 10	Consider options for future fire protection systems .....	3

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Information Sheets FP 1 to FP 3 give compliance details for the fire protection sector in relation to the impact of the EU F gas Regulation. In this Information Sheet we provide advice on the first steps that should be taken to ensure your company, as a fire protection system owner or operator, meets its key obligations and minimises F gas emissions.

There is no restriction on the use of HFCs for fire protection equipment or systems. The regulation is about containment and emission control which is good practice for all fire protection equipment.

## **Step 1 Identify general scope of obligations**

The first step is to identify those fire protection systems that contain HFCs. All fire protection systems should be serviced in accordance with national standards, so your maintenance personnel will be able to identify those affected by the EU F gas Regulation.

Once you have confirmed that HFCs are being used on your site, consider the parts of the EU F gas Regulation that apply to your company. The obligations for the fire protection sector are summarised in Information Sheet FP 3. A key issue is to establish the quantity of F gas on each separate fire protection system as the obligations are dependent on the system charge. Any system with 3 kg or more of F gas will require a regular leak testing programme and records will need to be kept.

As you establish the answers to these questions you should make an estimate of the number of sites and systems in your organisation that are affected. This will help you assess the overall impact of the Regulations and influence the way in which you will plan for compliance.

It is also important to establish whether you have any non-fire protection system obligations related to F gases. For example, do you use HFCs for refrigeration, air-conditioning and heat pump equipment (RAC systems) or high voltage switchgear?

## **Step 2 Allocate director level and operational responsibilities**

The next step is to allocate responsibilities. It is suggested that a Director has overall control, so you can be certain that obligations are being met. It may be necessary to identify operational responsibilities in several parts of the company to ensure full coverage – “operators” have the main responsibilities under the EU F gas Regulation.

### **Step 3 Establish an inventory of relevant equipment**

Consider establishing an inventory of all the F gas equipment in the organisation. It is sensible to give each piece of equipment a unique identification and record the location and other relevant details (it may be possible to cross reference with your asset register). For each system you should also identify:

- Type of substance employed (F gas, other),
- Quantity of HFC (see FP 6 for advice).

### **Step 4 Set up a record keeping system**

For all F gas systems of 3 kg or more you must keep records (see Information Sheet FP 6 for details). The inventory is a good starting point for record keeping, but each system or extinguisher must have its own set of records or log book. It is the responsibility of qualified personnel working on the equipment to regularly update the records that you keep. There is no obligation to consolidate the information in the individual log books, but this should be considered as a means of tracking all of the company's equipment containing F gas.

There is no obligation to keep records for F gas systems below 3 kg, although it may be prudent to include all systems in your records.

### **Step 5 Ensure leak test obligations are being met**

For all fire protection systems of 3 kg or more at a minimum an annual leak test is required by the Regulation, but all systems should be checked every 6 months in accordance with ISO 14520<sup>1</sup>. The obligation for testing applied from 4th July 2007 so leak testing records should already be in place. Leak tests must be carried out by appropriately qualified personnel and the results of tests must be recorded. Any leaks identified must be repaired and the system re-tested by an appropriately qualified personnel.

### **Step 6 Ensure automatic leak detectors are fitted**

For fire protection systems above 300 kg of F gas in new systems it is mandatory to fit automatic leak detection systems. This obligation has been in force since 4th July 2007, except for systems installed before July 2007 for these systems this obligation has been in force since July 2010.

### **Step 7 Use records to identify recurring problems**

Make use of your records to ensure that any recurring incidents are reviewed.

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<sup>1</sup> EN15004 is now published and is the European equivalent of ISO 14520.

## **Step 8 Only use appropriately qualified personnel**

“Operators” have an obligation to ensure they only use personnel, be they contractors and/or in-house staff, with the appropriate qualifications to work on your fire protection systems. If you need to take delivery of containers of F gas then you may need to employ appropriately qualified and certificated personnel. Your fluid supplier may ask for a certificate as evidence that only appropriately qualified personnel will be using the F gas for maintenance or servicing. For more information on the required qualifications and certification see Information Sheet FP 5.

## **Step 9 Company certification**

Make sure your organisation has the relevant certification. All companies employing personnel to undertake certain activities on fire protection systems, be that in-house or to work as a contractor, must hold a company certificate. See Information Sheet FP 5 for more details,

## **Step 10 Consider options for future fire protection systems**

If you are planning to install a new fire protection system you should consider the following as ways for your company to reduce HFC emissions.

- Select HFCs only where careful risk evaluation shows them to be the right choice when safety, speed of suppression, space and weight and cost are taken into account.
- Choose fire suppression systems with high reliability.
- Endorse rigorous standards in fire suppression system design, installation, commissioning, inspection and maintenance.
- Choose advanced fire detection that minimizes discharges.
- Support recovery and recycling.

The information in this document is intended as guidance and must not be taken as formal legal advice or as a definitive statement of the law. Ultimately only the courts can decide on legal questions and matters of legal interpretation. If you have continuing concerns you should seek legal advice from your own lawyers.

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