

30 May 2019

EFCTC letter to competent authorities for ADR application

In response to rapid emergence of illegal traffic of Hydrofluorocarbons (HFCs- or refrigerants) across the EU, and in order to assist the EU and Member States, EFCTC has launched a multi-level programme to fight against this illegal trade to raise awareness on this problem.

One of the issues related to the Illegal imports of F-gases is the increased activity in the transportation of pressurized/liquefied refrigerant gases in non-compliant cylinders that do not meet the ADR 1.1.4.2. requirements.

Competent authorities responsible for the ADR application, institutions and transportation related associations have been informed about the problem and have been asked to ensure that the ADR rules are strictly enforced in this respect.

Brussels, 10 May 2019

Dr. Nick Campbell
Chairman EFCTC

Dear Mr WILMART

Subject: Subject: Violation of ADR rules – Refrigerant gases in non-compliant cylinders

I am writing you to draw your attention that there appears to be an increased activity in the (transit) transportation of pressurized/liquefied refrigerant gases in non-compliant cylinders. These gases are shipped from non-EU countries in non-refillable single use cylinders that meet the US DOT requirements, but not the ADR 1.1.4.2. requirements. The cylinders typically have a capacity of 5 to 10 litres and are transported in 20 ft sea containers.

Under Multilateral Agreement M299, certain gases and liquids in **refillable** pressure receptacles approved by the US Department of Transportation may be carried from the location of the temporary storage to the end users under strict conditions.

Since the cylinders concerned are non-refillable, they clearly do not qualify under the exemption of M299.

I would appreciate it if you could ensure that the ADR rules are strictly enforced in this respect. Should you require additional information, please feel free to contact our organization via e-mail: Angelica Candido – anc@cefic.be.

Sincerely,

Dr. Nick Campbell
Chairman EFCTC



Reference: https://www.unece.org/trans/danger/publi/adr/adr_e.html

The European FluoroCarbons Technical Committee is a Cefic Sector Group that monitors legislation related to HFCs (hydrofluorocarbons), and HFOs (hydrofluoro-olefins) in the EU and at global level. Fluorocarbons are used as feedstock, as refrigerants, as solvents and as blowing agents for insulation plastic foams.

Contact: EFCTC Chairman: Mr. N. Campbell, nick.campbell@arkema.com
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