

This project is co-financed by the European Union and the Republic of Turkey

Setting up a new F-gas legislation in Turkey

Julia Kleinschmidt Öko-Recherche

31st Meeting of the Parties to the Montreal Protocol 6 November 2019 Rome, Italy









Current Turkish F-gas Regulation

Turkish F-gas Regulation 2018

Revised Turkish F-gas Regulation

- Based on findings of the earlier project "Technical Assistance for the Usage of F-Gases in Turkey and Harmonisation of Related Legislation" (2014-2016)
- Based on the "old" F-gas Regulation (EC) No 842/2006 that implemented a number of measures (e.g. containment, competence of personnel handling F-gases, bans of F-gases in specific applications, ban on non-refillable containers)
- Published in the Official Gazette on 4 January 2018, numbered 30291









Revising the Turkish F-gas Regulation

Turkish F-gas Regulation 2018

Revised Turkish F-gas
Regulation

- **▶** Development of a <u>complete new draft F-gas legislation</u> for Turkey
 - Based on the "new" F-gas Regulation (EU) No 517/2014
 - Based on the results of the legislative gap analysis
 - Taking into account Turkey's obligations as A5 country under the Kigali Amendment
 - Including findings and recommendations from discussions and consultations with the MoEU and national stakeholders from politics, industry and civil society





Legislative gap analysis





- Detailed comparative analysis to identify gaps and differences and to provide a basis for subsequent activities
 - F-gas Regulation (EU) No 517/2014 and Regulation (EC) No 842/2006 (and supplementing Commission implementing regulations)
 - F-gas Regulation (EU) No 517/2014 and 2018 Turkish F-gas Regulation (including supplementing by-laws)
 - Obligations for Turkey as A5 country under the Kigali Amendment
- Practical implications for affected industry
- List of institutional issues to implement new provisions







General comparison

Measure	Kigali Amendment (Article 5 countries)	Regulation (EU) No 517/2014	Regulation (EC) No 842/2006	2018 Turkish F-gas Regulation
Production controls	V	V	-	-
Import/export controls	V	V	-	-
Placing on the market/use controls	-	V	V	V
Labelling	-	V	V	V
Emission controls	(V)	V	V	V
Registration and records keeping	-	V	V	V
Reporting	V	V	V	V
Training and certification	-	V	V	V









F-gas Regulation (EU) No 517/2014



- Entered into force in January 2015
- Replaced Regulation (EC) No 842/2006
- Introduced additional and far-reaching requirements
- Supplemented by twelve Commission implementing regulations (some new or revised)
- EU Member States are allowed to maintain or introduce more stringent measures
- Includes
 - Several new or revised definitions
 - "Other" F-gases (e.g. unsaturated HFCs)
 - "Tonnes of CO₂e" as key indicator









F-gas Regulation (EU) No 517/2014

Measures to <u>avoid the use</u> of F-gases



Measures to prevent leakage of F-gases









Example: leakage control



2018 Turkish F-gas Regulation

	Frequency of leakage checks		
Charge size	No LDS installed	LDS installed	
3 kg and more	12 months	/	
30 kg and more	6 months	/	
300 kg and more	3 months	6 months	

- Charge size of 5 t CO₂e is equivalent to e.g. 1.3 kg R404A (GWP 3922) or 3.5 kg R134a (GWP 1430)
- Leakage Detection Systems (LDS) obligatory for equipment types containing ≥ 500 t CO₂e

F-gas Regulation (EU) No 517/2014

	Frequency of leakage checks		
Charge size	No LDS installed	LDS installed	
5 t CO ₂ e and more	12 months	24 months	
50 t CO ₂ e and more	6 months	12 months	
500 t CO ₂ e and more	3 months	6 months	

- The thresholds for leak check intervals are defined in t CO₂e, rather than in kg refrigerant.
- The obligation for leakage checks immediately after putting new equipment into service not contained in the Turkish F-gas Regulation.





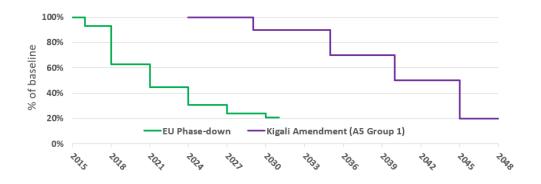




"Between two worlds"



- Geographical proximity to the EU → Turkey as major producer of RAC equipment and exporter to the EU
- Turkish manufacturers affected by the impacts of the EU HFC phase-down and have already adopted alternative technologies
- Under the Kigali Amendment, Turkey will be obliged to follow the HFC phase-down schedule obligatory for developing countries (A5, group 1)







Example: placing on the market bans



Placing on the market bans on RAC equipment according to the Regulation (EU) No 517/2014

Examples	GWP	Date of prohibition
Domestic refrigeration	≥ 150	1 January 2015
Commercial refrigeration (hermetically sealed)	≥ 2500 ≥ 150	1 January 2020 1 January 2022
Stationary refrigeration (except applications below – 50 °C)	≥ 2500	1 January 2020
Multipack centralised commercial refrigeration (≥ 40 kW)	≥ 150 ≥ 1500 in primary refrigerant circuit	1 January 2022
Movable room AC (hermetically sealed)	≥ 150	1 January 2020
Single split AC (< 3 kg of F-gases)	≥ 750	1 January 2025

- 2018 Turkish F-gas Regulation already introduced placing on the market ban for domestic refrigerators and freezers that contain HFCs with GWP ≥ 150 (as of 1 January 2019)
 - → similar to the Regulation (EU) No 517/2014
- New bans e.g. in the RAC sector might follow the bans set out in Regulation (EU) No 517/2014
 - → to ensure competitiveness of the Turkish industry







Stakeholder involvement



Foam sector



- Ministries, competent authorities
- Environmental inspectors
- Importers, exporters
- Equipment manufacturers
- Business associations
- Service companies
- Operators
- To provide their (sector-specific)

 views on the scope of the

 envisaged revision of the Turkish Fgas Regulation
- To develop recommendations









Stakeholder input





Asking for **input on relevant aspects** such as

- Design of a HFC phase-down (according the KA/F-gas Regulation)
- Design of a quota allocation system
- Introduction of a HFC import/export licensing system
- Introduction of additional placing on the market bans
- Certification/evaluation/training body (or bodies)
- (Minimum) requirements for training/examination programme
- Certification system covering F-gases (and ODS)
- Introduction of a central equipment database
- Submission of annual reports to DBR database
- Organisation and infrastructure for recycling/reclamation/collection/destruction of F-gases
- ...



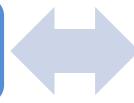






Final process

New draft for a revised F-gas legislation







Revised Turkish F-gas legislation

 Prepared within the project (Activity 9)

- MoEU to review the draft for a revised Turkish F-gas Regulation and decide about final version
- MoEU to start the process of approval and legislative process within the Turkish government

 Publication in the Official Gazette









Thank you very much for your attention!

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www.F-GasesTurkey.com











This project is co-financed by the European Union and the Republic of Turkey

Establishing electronic tools for F-gas data collection, monitoring and reporting in Turkey Felix Heydel

TECHNICAL ASSISTANCE FOR INCREASED CAPACITY FOR TRANSPOSITION AND CAPACITY BUILDING ON F-GASES

Side event during the 31st MOP to the Montreal Protocol 06 November 2019, Rome





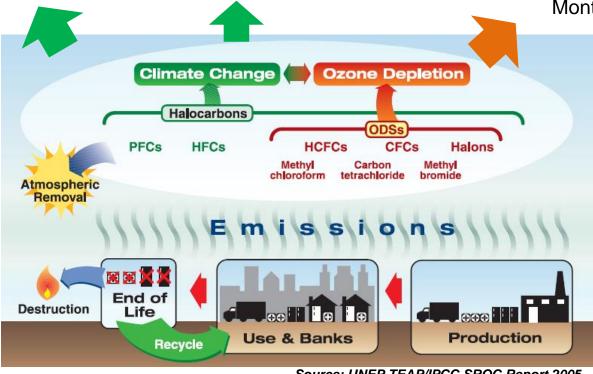




International reporting obligations concerning F-gases

Reporting of F-gas emissions under UNFCCC (New) reporting obligation of HFC production and consumption under Montreal Protocol (Kigali Amendment)

Reporting of
ODS production and
consumption under
Montreal Protocol













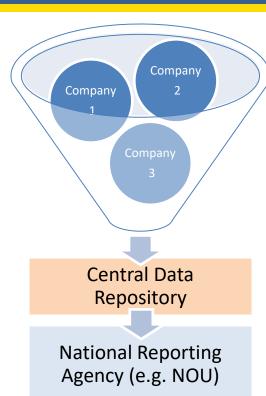


Objective of the project activity

- Development of two harmonised electronic databases
 - Database of Business Reports (DBR) for the submission of the Ozone report to UNEP's Ozone Secretariat
 - Central Register of Equipment Operators (CREO) for compilation of F-gas emissions inventory (UNFCCC)
- Experience from Poland considered
 - General advantages of electronic databases
 - Ensure high quality of data
 - Keep track with high number of reporters
 - Enables automated checks with e.g. with import/export license data

Facilitates monitoring, aggregating and data analyses











Database of Business Reports

- Collection of annual reports on F-gases, data will include:
 - Quantity of F-gases (imported, exported, used, sold, purchased, recovered, recycled, reclaimed, destroyed, or stored)
 - Equipment (types) imported, exported, manufactured
- Expected amount of reports submitted annually ca. 20 000
- "One time data submission database" where the reports on Fgases will be submitted once a year by certain deadline
- Enables to calculate the HFC consumption under Article 7 of the Montreal Protocol

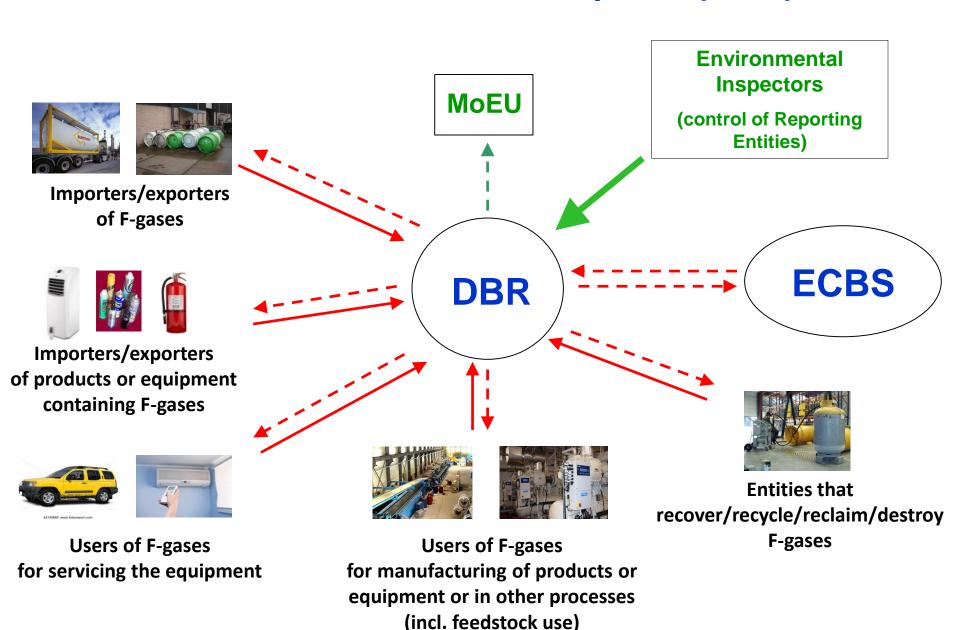








Database of Business Reports (DBR)







Central Register of Equipment Operators

Collection of logbooks for equipment containing
 5 tons of CO₂ eq of F-gases or more



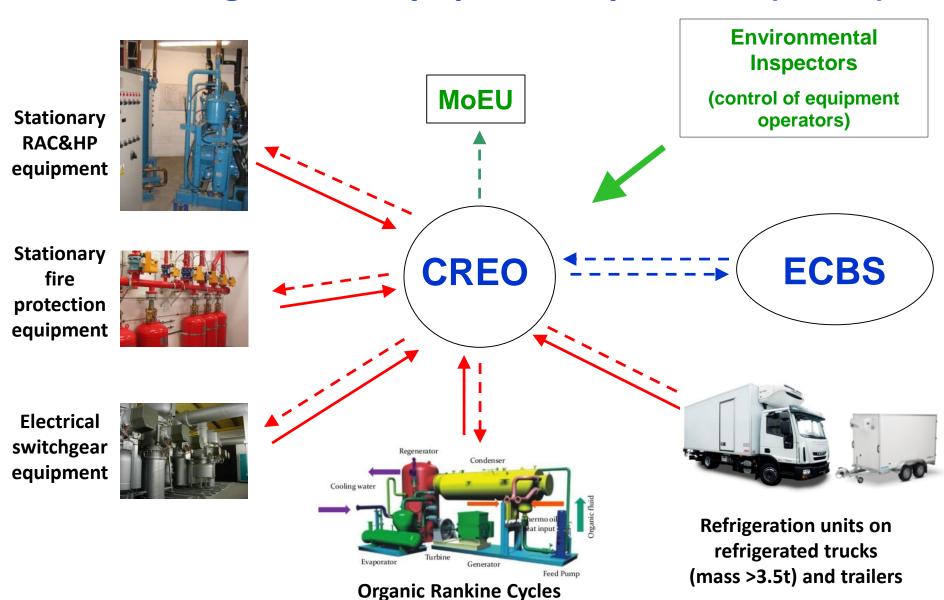
- Electronic F-gas logbooks will include data on:
 - Operator, equipment type, F-gas contained
 - Conducted activities: installation, maintenance/servicing/repair, decommissioning, leakage checking, leakage repair, leakage detection system installation, leakage detection system checking, recovery
- Expected amount of RAC units (=1 logbook each) in the country ca. 800 000
- "Live" database where new data entry can be introduced at anytime
- Enables to compile a national inventory on emissions of fluorinated GHGs under Article 4 of UNFCCC







Central Register of Equipment Operators (CREO)





Additional benefit: link between reporting data flows

Top-down: HFC Consumption: Mass balance approach

Imports

Exports

Destruction

DBR





Assess completeness checks of data collected using different approaches



Bottom-up: HFC Equipment Registry: Emission factor

Electronic logbook for each equipment unit

Leakage rates during operation (operation emissions)

Disposal and recovery emissions (disposal emissions)







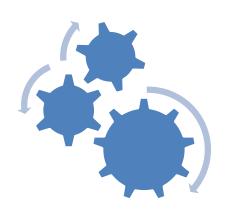






Process

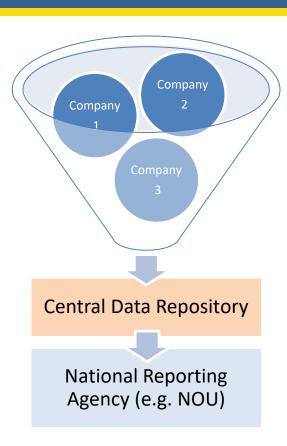
- An IT company with experience in this field was contracted for the development
 - From database concept to implementation about 1 year
- Close communication with MoEU on technical details concerning the implementation
- IT expert supports the MoEU during implementation phase
- Systems includes a helpdesk function to communicate with companies and operators
 - Allows for automated alerting of reporters or operators on deadlines e.g. for approaching leak check of operators





Benefits of the developed databases for the MoEU

- The databases will allow the MoEU to effectively monitor compliance with obligations of the revised Turkish F-gas Regulation, e.g.
 - Compliance with HFC reduction targets (also on company level)
 - Record keeping of equipment
 - Emission prevention
 - Leakage checking & installation of detection systems
 - Recovery of F-gases from equipment
 - Report breaches of F-gas legislation to national inspectorates



Idea of establishing DBR and CREO received full support from Turkish industry!









Thank you for your attention!

Felix Heydel

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F-gas alternatives in Turkey

Dietram Oppelt Project Expert, HEAT International

31st Meeting of the Parties to the Montreal Protocol 6 November 2019 Rome, Italy

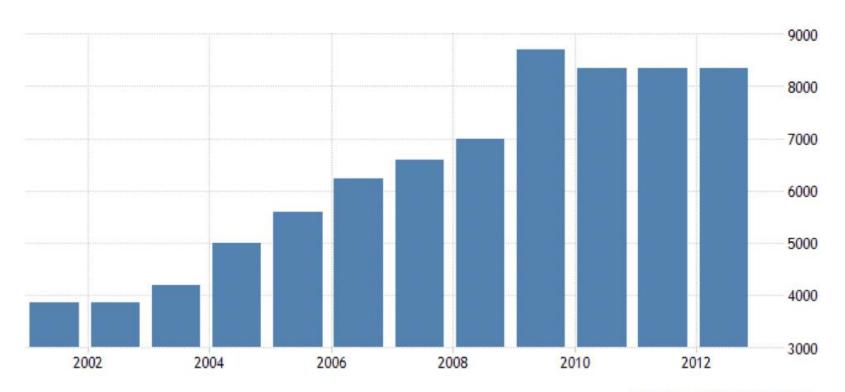








BAU - Historically growing F-Gas emissions













Assessment of F-gas alternatives

Focus subsectors

- Refrigeration, air conditioning and heat pumps (RAC&HP),
- Fire protection (FP),
- Switchgear,
- Foam and Solvent sectors









Sector analysis

Focus subsectors

- Refrigeration, air conditioning and heat pumps (RAC&HP),
- Fire protection (FP),
- Switchgear,
- Foam and Solvent sectors

- Questionnaires
- Interviews
- Workshops









Key findings I

- RAC&HP, foam and fire protection sector ready for a fast take up of low GWP alternatives
- Low GWP alternatives are commerically available
- Ammonia available for chiller and industrial processing
- Medium and low GWP available for residentail and commercial refrigeration and AC









Key findings II

- Market penetration of low GWP alternatives low
- Potential to improve legislative measures
- Neet for additional awareness raising activities

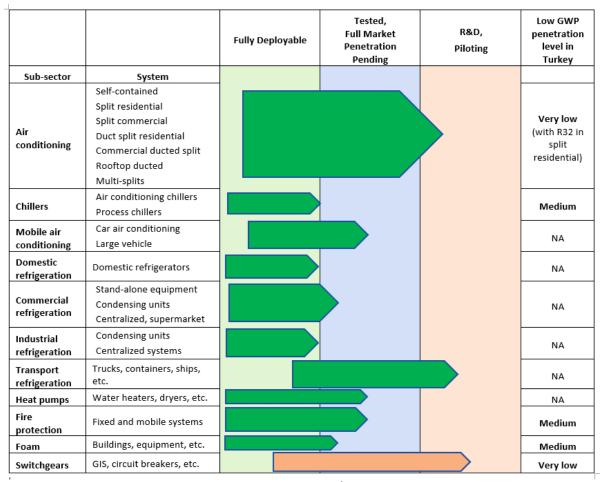








Key findings II











Summary

- HFCs are still increasing
- The Turkish industry is capable to move to low GWP alternatives
- Implementing of EU F-gas legislations elements will accelerate transition to low GWP alternatives
- Awareness raising required to accelerate the "seeding" and market penetration of low GWP alternatives









Thank you very much for your participation!

www.F-GasesTurkey.com







"Managing F-Gases in Turkey"

HCFCs Phase-out out interventions in Turkey and the Kigali Amendment

Rodica Ella Ivan Industrial Development Officer UNIDO - Department of Environment

6 November 2019 – MoP31 side -event



ivile funded projects with impact on the fifes

future phase-out commitments

- 1. HCFCs Phase-Out Management Plan of Turkey
 - Approved in 2012 by the 68th Meeting of the Executive Committee
 - The Government of Turkey committed to reduce the consumption of HCFCs consumption by 86.4 % per cent of the calculated baseline by the year 2017
 - (current achieved consumption phase-out in 2019 reached 98% of the baseline)

2. Enabling Activities for Kigali Amendment

Approved by the 80 ExCom in November 2017
 With the objective to support ratification of the Kigali Amendment to the Montreal Protocol and initiate early implementation actions









ivilif tunded projects and the impact on the

HFCs future phase-out commitments

Two areas of priority interventions high were included within the HPMP Stage I of Turkey:

- To complete HCFCs consumption phase-out in foam sector (SH Manufacturers and their down-stream users) considering zero GWP alternatives
- To address the increasing trend of the HCFC-22 consumption in the refrigeration servicing sector; several elements linked this sub-component with the HFCs control:
 - Introduction of EU F-Gas Regulation elements within the legislative system (with applicability mainly to HCFCs control)
 - Consideration of a demonstration component within the HPMP to raise awareness and promote low GWP refrigerants (including several pilot conversion to such alternatives and considering the energy efficiency benefits for each of the study cases)







Synergy concept and benefits

Synchronizing the EU funded F-Gases project interventions with the HPMPs activities in field created premises for enhanced impact for both projects

- In <u>developing the F-Gases regulatory framework</u>, the experience accumulated during the development and enforcement of the HCFCs control (HPMP project) was beneficial for understanding the challenges and the barriers
- EU funded project main outcome is the complete HFCs regulatory framework, while the effective early interventions for low GWP alternatives introduced during the HCFCs phase-out contribute directly to its future enforcement and creates the momentum for achieving compliance with Kigali commitments
- The projects complements each other.









Synchronizing the EU funded F-Gases project interventions with the Kigali EA project

- Further, addressing at an early stage the HFCs control (as a priority in Turkey for accessing the EU market) was beneficial towards the ratification process for the Kigali Amendment (currently under consideration by the Parliament)
- The activities of the Kigali Enabling Activities project (the ratification) are strengthening the legal base for the HFCs control and supports the decision for the licensing and quota system allocation

Another important step for the decision making

Process on criteria for enforcing HFCs imports licensing and future quotas is

the ODS alternatives survey conducted with MLF funding for the years 2014 – 2016, and replicated under the EA project for the HFCs consumption in 2017 and 2018, facilitating the market consumption forecast and potential trends.









Setting up field cooperation

- NOU/ MoEU Turkey played crucial role
- Teaming-up in field on the projects activities execution (direct cooperation between the experts and executing teams)
- organization of the linked activities back—to-back (e.g. F-Gas regulatory consultative workshop back to back with legislative consultations on Kigali Amendment)
- Sharing information for avoiding overlaps and
- Aligning / linking projects annual work-plans
- Involving local technical experts in relevant events/workshop/ consultations of both projects









Few elements on the low GWP pilot conversions component of the HPMP executed in partnership with SOSIAD Turkey

The HPMP Stage I demonstration component addressed a series of activities, that are expected to be completed until December 2019:

- National awareness campaign on R-22 phase out and related bans, national dissemination activities on alternatives,
- Demonstration Project CO2/NH3 cold room cascade system conversion.
- R-448A/R290 conversion of a discount supermarket currently running on HCFC-22.
- R-123 chiller conversion to R-1233zd



http://www.unido.sosiad.org.tr/en/





Demonstration Site	Reason for Selection	Type of System	End-User
Izmir	HVACR manufacturers are very active in this region. It is an appropriate target group for dissemination and awareness raising.	CO ₂ /NH ₃ cold room cascade system conversion.	UNILEVER/Algida Ice Cream Plant, Izmir
Istanbul (3 discount supermarkets)	International/national food retail sector is very common in Istanbul. Corporate headquarters and end users are located here and easy to reach.	R-448A/R-452A/R290 conversion of a discount supermarket with HCFC-22.	Sariyer Market Ferahevler, Sariyer Market Etiler, Cagri Market, Fikirtepe (Istanbul)
Ankara	State-owned stakeholders are the target audience. Therefore, one of the important pillars of dissemination and awareness.	R-123 chiller conversion to R-1233zd	ETI Soda, Ankara Plant



Thank you for your attention!









Republic of Turkey MINISTRY OF ENVIRONMENT AND URBANISATION

DEPARTMENT OF CLIMATE CHANGE AND ADOPTATION

TECHNICAL ASSISTATION INCREASED CAPACITY FOR TRANSPOSITION AND CAPACITY BUILDING ON F-GASES UIKÜ füsun ERTÜK









CONTENTS

- -Implementation of MP
- By-Law on ODS and other relevant regulation
- Provisions regarding the current By-law on F-Gas
- Kigali Amendment Adaptation Process (Road Map)



MONTREAL PROTOCOL

Party to Montreal Protocol in 199
And adopted all amendments
(except Kigali Amendment) to MP
Ministry of Environment and
Urbanization is coordinating
national and international studie





By-law on ods/other relevant regulations

In 1999 the first By-law on the Reduction of the Substances that Deplete the Ozone Layer published in Turkey. It has been revised in 2006 and 2008.

Second By-law on ODS entered into force in Official Gazette dated 12 November 2008 and numbered 27052 (By-law on phase-out of ODS)

Second By-Law on ODS entered into force in Official Gazette dated 07 April 2017 and numbered 30031 based on 1005/2009 EC Directive.(By-law on ODS)

Circular (2016/01) Usage and Importation of ODS

Communiqués of the Ministry of Trade; importation & exportation



By-law on ODS dated 28.07.2017 (harmonization of 1005/2009/EC Substances That Deplete The Ozone Layer Directive)

Placing on the market and use restrictions

Labeling

Leakage checks

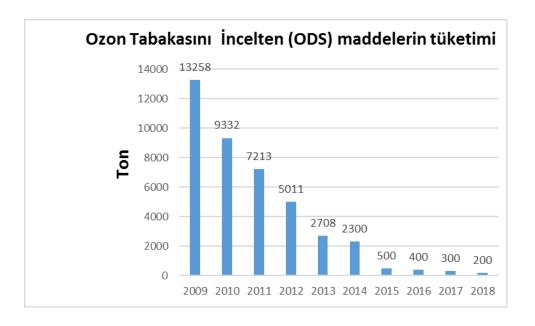
Training and certification system

Ods Monitoring system IMPORTER END-USER (SERVICE) **IMPORTER Companies supplying** these gases, which are not **IMPORTER** produced in our country, (PRODUCTI to the service companies or industrialists producing ON) domestic ventilation systems. **DISTRIBUT Companies that** OR distribute and export gases through domestic sales networks. Companies engaged in the service and maintenance of all kinds of products and equipment working with controlled substances **Companies that working INDUSTRIA** and producing with LST controlled substances.

C DILL SAN A

phase OUT OF ods

The amount of the exported Ozone Depleting Substances decreased within the phase-down schedule applied under Montreal Protocol, from 13200 tonnes in 2009 to 200 tonnes in 2019.



It is stated that 18 billion tonnes of CO₂ equivalent will be decreased between 2010-2050 as a result of HCFC phase-out through worldwide studies on ODS phase-down.



Honor madals!









Honor madal in 2019!





Honor madal in 2019





Training activities

- ➤ The meetings for raising cooperation between NOU and Customs Officer were held within in the framework of cooperation between UNEP-MoEU
- ➤ ODS Inspection Trainings have been conducted for the inspectors from 12 Province Directoretes (Ankara, İstanbul, Kocaeli, Tekirdağ, Bursa, Balıkesir, İzmir, Antalya, Konya, Mersin, Manisa ve Denizli)







Other activities

• The International Ozone Day has been celebrating every year in various events around the world. Since 2010, various events have been organized in our country..





Other activities





F-GAS REGULATION

By-law on F-gas:

It entered into force after being published on the official gazette No. 30291 on 04.01.2018.

By-law;

- Labelling (As of the publishing of the by-law)
- Leakage Testing, (As of the establishment of central data base)
- Reporting, (As of the establishment of central data base)
- **Electronic Registration** (As of the establishment of central data base)



by-law ON FLUORINATED GREENHOUSE GASES

REGULATION CONTENT REGULATION REGULATION REGULATION REPORTING REPORTING TRAINING AND CERTIFICATION MARKET SUPPLY AND USAGE



Placing on the market and use restrictions

- Non-refillable F-gas cylinder
 - imports banned from 4 Jan 2020,
 - POM banned from 1 Jan 2022





Placing on the market and use restrictions

- Placing on the market (POM) and use restrictions relevant to RAC&HP sector
 - Bans on placing on the market
 - Non-confined evaporation systems that contain HFCs or PFCs as refrigerants
 - By-law on F-gas banned from 1 Jan 2019
 - Domestic refrigerators and freezers that contain HFC with GWP of 150 or more (either as refrigerants or a blowing agents in insulating foam)
 - By-law on Fgas banned from 1 Jan 2019





Placing on the market and use restrictions

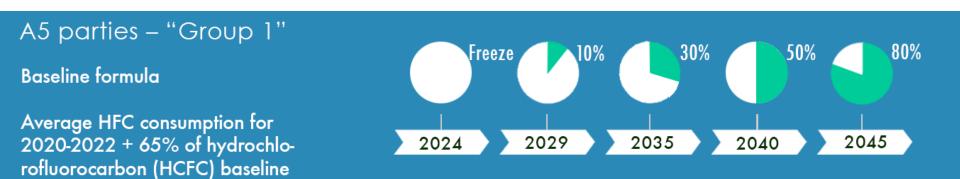
- Placing on the market (POM) bans relevant to fire protection sector
- Bans on placing on the market
- Fire protection equipment containing PFCs or HFC-23
- from 1.01.2019





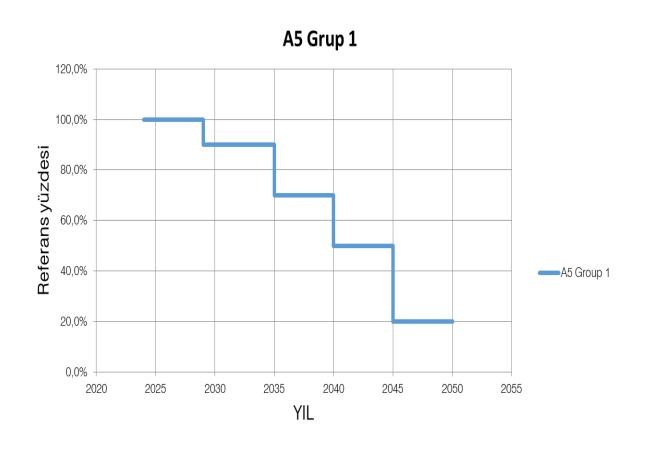
KIGALI AMENDMENT PHASE DOWN PLAN

A5 countries are allowed to take time until 1 January 2021 to establish their licensing system.





what is the road map for phase down?





RESPONSIBILITIES UNDER KIGALI AMENDMENT

- Base Year Reporting (Article 7)
- Production, export and import base year for articles on Annex-F will be prepared.
- Base year period for A 5 Group 1 countries is between 2020-2022.

Baseline year Article 5 Group 1	Baseline data to be reported by
2020	30 September 2021
2021	30 September 2022
2022	30 September 2023



ECHINICAL ASISTANCE FOR INCREASED CAPACITY FOR TRANSPOSITION AND CAPACITY BUILDING ON F-GASES LEGISLATION GAP ANALYSIS

- When the provisions of Kigali Amendment and F-Gas Regulation are compared,
- The most important parts of EU Directive;
- Some definition,
- HFC phase-down schedule
- HFC Quota system
- HFC licensing system
- Prohibition of placing on the market and use
- Are not included in By-law on Flourinated Greenhouse Gases.



ROAD TO KIGALI...



Ratification of Kigali Amendment,

Preparation of more comprehensive By-law on F-Gas the provisions regarding implementation of Kigali Amendment of Montreal Protocol,

Issuing a circular about Training / Certification,

Preparing a HFC phase-down plan, calculation the baseline

Developing HFC quota allocation, quota authorisation mechanism and recording system

Developing seperate national customs codes for HFC and mixtures containing HFC.

Developing a reporting system, central data base and business reports data base.



ROAD TO KIGALI...

- OIt is very important to enter leak checks with Central Data base (CREO) as gas leaking increases emission in industrial and commercial refrigerant and fire protection sectors.
- Awareness for transition to low GWP alternatives must be expanded and studies for capacity building must be accelerated.
- F-gas waste management system development activities (legistlation&system)

•



THANK YOU FOR YOUR ATTENTION!

ENVIRONMENT MANAGEMENT GENERAL DIRECTORATE
DEPARTMENT OF CLIMATE CHANGE AND ADAPTATION
PROTECTION OF OZONE LAYER UNIT (NATIONAL OZONE UNIT)



This project is co-financed by the European Union and the Republic of Turkey

Overview of the project - current status and success factors

Gönül Ertürer Project leader

31st Meeting of the Parties to the Montreal Protocol 6 November 2019 Rome, Italy









Project Overview

- Co-financed by EU and Government of Turkey
- Beneficiary: MoEU
- Technical capacity development for regulating and managing f-gases towards mitigating climate change
- Technical Assistance Team: GFA Consulting Ankon -Öko Recherche - Heat International
- https://f-gasesturkey-en.com
- 3-years project; May 2017-May 2020









Project Components

<u>Legislative Studies</u>

- Activity 1: Legislative Gap Analysis
- Activity 2: Preparatory Workshops
- Activity 9: Revised F-Gas Legislation

Capacity Building Activities

- Activity 3: Training and Certification of Technicians and Service Companies
- Activity 4: Awareness Raising on F-Gas Alternatives
- Activity 5: Leak Testing
- Activity 7: Waste Treatment and Recovery

Establishment of F-Gas Inventory and Database

- Activity 6: National F-gas Inventory
- Activity 8: Establishment of a Reporting System of Fully-Functioning F-gas Database



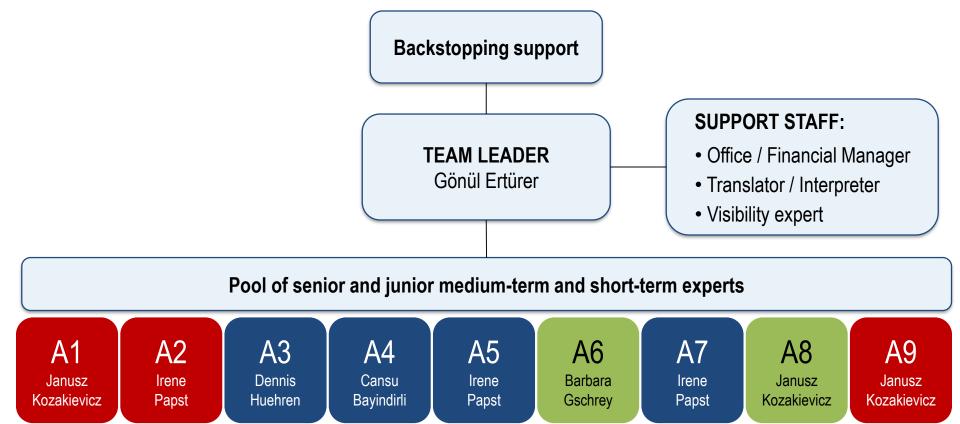








Technical Assistance Team





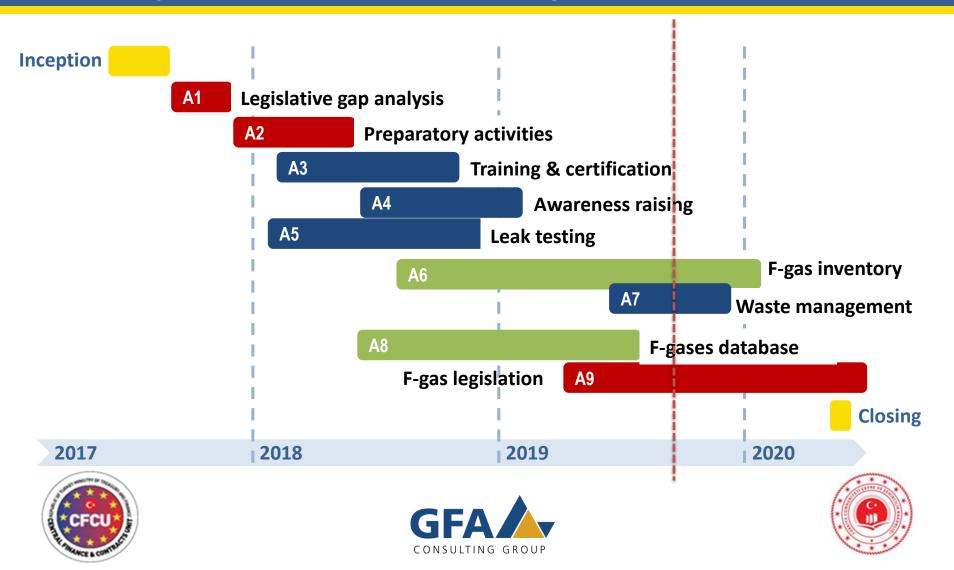








Workplan / Timeline for Project Activities





Legislative Gap Analysis

 Align the current national F-gas legislation with EU F-gas Regulation 517/2014 and supplementing by-laws

 Comply with Kigali Amendment commitments









Preparatory Workshops

- Stakeholder consultation meetings with regulators, sectoral associations, operators, equipment distributors, gas importers, service technicians
- Thematic discussions
 - Training and certification
 - Waste management
 - Quota allocation
 - Leak tests
 - Data Base and Reporting









Capacity Building Activities

- Training of Service Technicians
- Pilot Programme for Leak Testing
- Training of MoEU inspectors
- Recovery of f-gases, recycling, treatment and disposal









Consultation workshops









Training of Trainers





















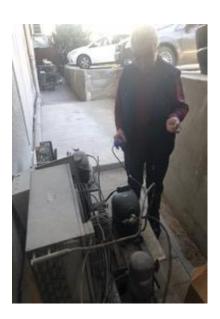


Leak Test Programme

















Waste management field study













Awareness Campaign











Visibility Materials











Broschures

F-Gazlar Nedir?

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Workshops



CONSULTING GROUP





Establishment of F-Gas Inventory and Database

- Central Registry of Equipment Operators
- Data Base of Reporting

- National F-Gas Inventory
- Evaluation of Current Inventories
- Evaluation of calculation approaches









Thank you very much for your participation!

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