

Illegal refrigeration trade:

EU(CZ) experience and reflections on EU F-gas regulation relevant for Customs

Jana Mašíčková

Tel.: +420 267 122 278

mob.: +420 704 655 771

email: Jana.Masickova@mzp.gov.cz

Air protection department

Ministry of the Environment, Czech Republic

<https://www.mzp.cz>

Fluorinated greenhouse gases (F-gases)



- Greenhouse gases – impact on climate
- Global warming potential: **GWP** → from one-digit numbers up to 24 300 (SF_6)
- Approximately 2,5% total world's greenhouse gas emissions, continuous increase



Use: Refrigeration, Air Conditioning, Fire Protection, Power Engineering (High Voltage Switchgear), Insulating Materials, Healthcare (Asthma Treatment, Inhalation Anaesthetic), etc.



F-gases in products and equipment



Commercial refrigeration



Personnel cooling



Firefighting equipment



Household refrigeration and freezing



Chillers



AC



Heat Pumps



Technical aerosols



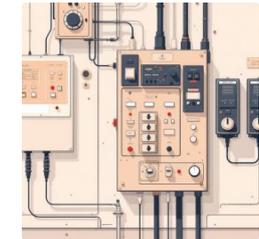
Insulation foams



Anesthetics



MDIs



Electrical switchgears

Regulation (EU) 2024/573 on F-gases

<https://eur-lex.europa.eu/eli/reg/2024/573/oj>

In force since 11. 3. 2024



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2024/573

20.2.2024

REGULATION (EU) 2024/573 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 7 February 2024

on fluorinated greenhouse gases, amending Directive (EU) 2019/1937 and repealing Regulation (EU) No 517/2014

(Text with EEA relevance)

THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,
Having regard to the Treaty on the Functioning of the European Union, and in particular Article 192(1) thereof,
Having regard to the proposal from the European Commission,
After transmission of the draft legislative act to the national parliaments,
Having regard to the opinion of the European Economic and Social Committee ⁽¹⁾,
After consulting the Committee of the Regions,
Acting in accordance with the ordinary legislative procedure ⁽²⁾,

- 1st regulation in force since **2006**
- 3rd generation of EU F-gas legislation
- Directly applicable
- Obligations
 - **Specified persons** manipulating/working with F-gases
 - **Member states** and their bodies (Customs, ENVI Inspection, Trade Inspection)

1. STRICTER RULES IN RELATION TO THE F-GAS EMISSIONS PREVENTION

- **Extension of existing obligations** → equipment, uses, number of F-gas substances, limits, etc.
- **New rules and obligations**
- **New bans**

2. STRENGTHENING THE ROLE OF REGULATION TO COMBAT THE ILLEGAL TRADE AND OTHER ILLEGAL ACTIVITIES

Definitions

Čl. 3

- Definition (1) : „Global Warming Potential“, „GWP“
 - (1) 'global warming potential' or 'GWP' means the climatic warming potential of a greenhouse gas relative to that of carbon dioxide (CO₂), calculated in terms of the 100-year global warming potential, unless otherwise specified, of one kilogram of a greenhouse gas relative to one kilogram of CO₂, as set out in Annexes I, II, III and VI or in the case of mixtures, calculated in accordance with Annex VI;
- Definition (3): „tonne of CO₂ equivalent“
 - (3) 'tonne of CO₂ equivalent' means a quantity of greenhouse gases expressed as the product of the weight of the greenhouse gases in metric tonnes and of their global warming potential;
- Definition (4): „hydrofluorocarbons“, „HFC“
 - (4) 'hydrofluorocarbons' or 'HFCs' means the substances listed in Section 1 of Annex I or mixtures containing any of those substances;

Definitions

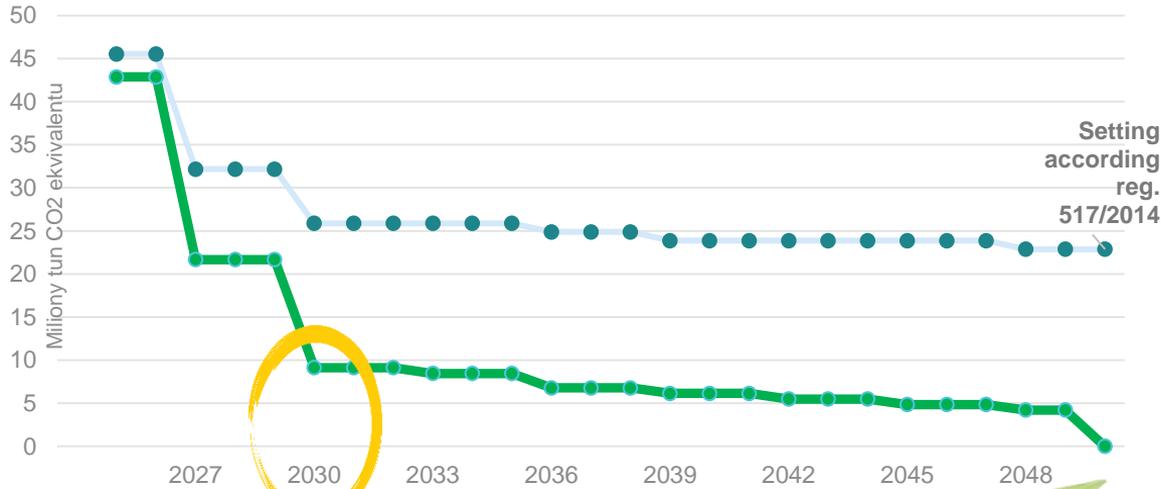
Čl. 3

- Definition (6) : „Placing on the market“
 - (6) 'placing on the market' means the customs release for free circulation in the Union or the supplying or making available to another person within the Union, for the first time, for payment or free of charge, or the use of substances produced, or of products or equipment manufactured, for own use;
- Definition (7): „Import“
 - (7) 'import' means the entry of substances, products and equipment into the customs territory of the Union, in so far as the territory is covered by a ratification of the 1987 Montreal Protocol on Substances that Deplete the Ozone Layer (the 'Protocol'), and includes temporary storage and the customs procedures referred to in Articles 201 and 210 of Regulation (EU) No 952/2013;
- Definition (8): „Export“
 - (8) 'export' means the exit of substances, products and equipment from the customs territory of the Union, in so far as the territory is covered by a ratification of the Protocol;

Reduction of HFCs placed on market

HFC phase-out & quota system

Art. 16, 17



- **Schedule 2025 – 2050**
- **3-year steps** to phase down HFC production and consumption
- **Exemptions** → destruction in EU, feedstock, export from EU (bulk substances only), military equipment, semiconductor sector

Baseline 2015 (= 100%):

- **2025-2026: 24,3%**
- **2027-2029: 12,3%**
- **2030-2032: 5,2%**

Total phase-out of in 2050.

5% comparing 2015

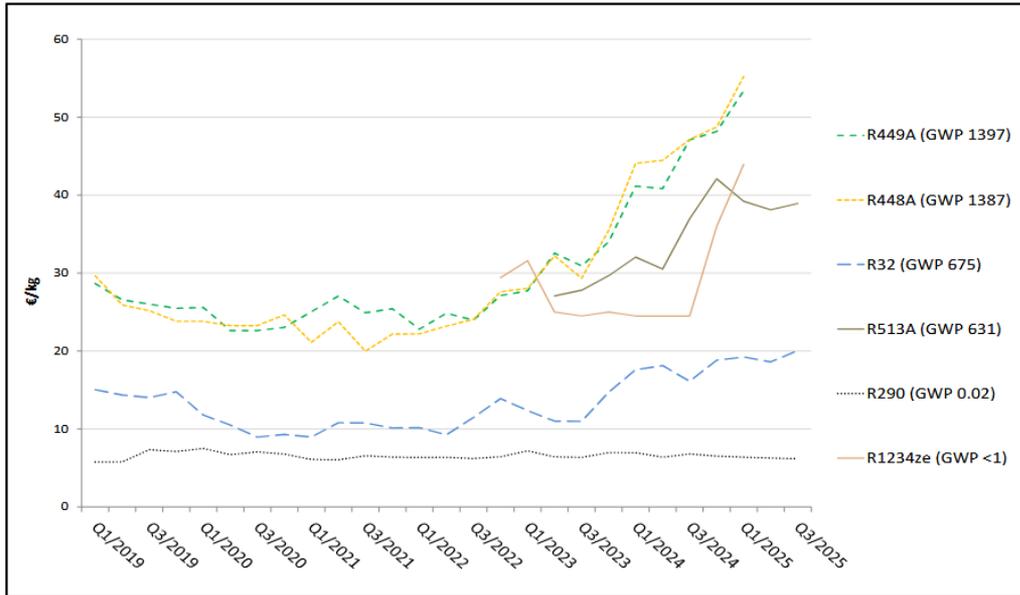
F-gas (refrigerants) prices



High price on the legal EU market

=

High profits from black market sales



Source: [EC Monitoring of Refrigerant Prices on the EU market](#)

Example: 12 kg bottle

- CHIN → TR = 40-50 €
- EU black market = 200 – 250 €
- EU market = 500-700 €



Licensing system



= control of import and export

Substances and Products Covered:

- Any fluorinated greenhouse gases listed in Annexes I, II, and III of Regulation (EU) 2024/573 or mixtures containing some of these substances
 - HFCs, PFCs, SF₆, HFOs, etc. or mixtures containing them
 - **Substances with very low GWP (incl. < 1)**
- Any products and equipment containing these gases



Quota system

Art. 17, 18, 19, 21

= main tool to ensure **phase down of hydrofluorocarbons (HFCs)** placed on the EU market

- control and reduction of F-gases emissions to meet EU climate targets
- Direct linkage with the licensing system

Substances and Products Covered:

- Substances: **HFCs**
- Products: **refrigeration, air-conditioning, heat pumps, and newly metered dose inhalers (MDIs).**

- Charging for the established quota system: **1 ton of CO₂ equivalent = €3**
- Limit for the placing of products and equipment containing HFCs on the market outside the quota system:



10 t equivalent CO₂



Quotas

Adjustments to the quota allocation mechanism → requirements for applicants – quota holders

BULK substances
= in vessels



Quota

- Distributed by European Commission
- Request by undertakings in F-gas portal (producers, importers of F-gases in BULK)

Products and Equipment



Quota Authorization

- From quota holders
- Authorization of someone to use the quota to import/place on the market in EU) product or equipment containing F-gases
- **Yearly import over 10 t eq.CO₂**

Import and Export

Valid License:

- Import and export of fluorinated greenhouse gases, and products and equipment containing those gases shall be subject to the presentation of a **valid license** to customs authorities issued by the Commission → **F-gas portal**
- Does not apply to equipment and products being personal effects
- F-gases imported to the EU considered as newly produced gases

LICENSE

A valid registration in the F-Gas Portal
at the moment of import or export



F-gas Portal and its functionalities

- Registration of:
 - EU and non-EU undertakings (Producers, importers, and exporters of **bulk F-gases** (Annex I–III), Importers and exporters of **products or equipment containing fluorinated greenhouse gases** (Annex I–III), exempted uses, destruction
 - customs authorities and auditors (reporting verification)
- Management of HFC quotas and authorisations for placing equipment on the market
- Submission of annual reports and declarations
- Access point for customs and competent authorities
- From 2025, the portal includes production rights data and quota allocation payment information



Linkage to the **EU Single Window Environment for Customs (CERTEX)**

https://taxation-customs.ec.europa.eu/eu-single-window-environment-customs_en

System & F-gas portal

[F-gas portal link](#)

Operated by the European Commission through the
F-gas Portal



centralized online platform for managing HFC quotas,
import/export licensing, and compliance reporting.

The screenshot shows the F-gas portal interface. At the top right, there is a language dropdown set to 'ENGLISH (EN)', a user welcome message 'WELCOME JANA MASICKOVA <JANA.MASICKOVA@MZP.CZ>', and a 'LOGOUT' link. The main header features the European Commission logo and the text 'CLIMATE ACTION F-Gas'. Below this is a breadcrumb trail: 'European Commission > Climate Action > Policies > Fluorinated Gases > Portal', followed by a 'GO TO ODS' button. A navigation bar contains tabs for 'CZECH REPUBLIC', 'HOME', 'PROFILE', 'REGISTRATIONS', 'HFC REGISTRY', 'AUDITORS', and 'REPORTING'. The main content area displays a personalized welcome message: 'WELCOME JANA MASICKOVA <JANA.MASICKOVA@MZP.CZ>' and 'YOU ARE IDENTIFIED AS CZECH REPUBLIC'. There are three main sections: 'MESSAGE BOARD' with a sub-section 'INFORMATION ON 2026 QUOTA' containing text about 2026 quota calculations and links to 'Article 17 of Regulation (EU) 2024/573' and 'FAQ'; 'HELP' with a link to 'security good practices and privacy statement'; and 'USEFUL LINKS' with a list of links including 'F-gas Regulation (EU) 2024/573', 'Reference Value holders 2025/2026', 'Correction of Reference Value holders 2025/2026', 'How companies register correctly', 'DG Clima F-gas website', and 'FAQs'.



CLIMATE ACTION

F-Gas

European Commission > Climate Action > Policies > Fluorinated Gases > Portal

GO TO ODS

CZECH REPUBLIC

HOME

PROFILE

REGISTRATIONS

HFC REGISTRY

AUDITORS

REPORTING

REGISTRATIONS

Below there is the list of registrations. You can filter the registrations by status and type. You can also look for a registration form of a specific organisation using the search option in the name column. You can change the number of applications displayed on the screen by clicking on the number on the bottom of the table.

FILTER REGISTRATIONS

Status	ID	Name	User contact	VAT/EORI/Ref. Number	Country	Business profile	Type	EU only representative	EU only representative country	
Valid					All	Includes	Undertaking		All	
All						All				
Draft										
Requested										
Revision										
Valid										
Rejected										
Cancelled										
Withdrawn										
Reporting only										

SEARCH

		USER CONTACT	VAT/EORI/REF. NUMBER	COUNTRY	BUSINESS PROFILE	TYPE	EU ONLY REPRESENTATIVE	EU ONLY REPRESENTATIVE COUNTRY	SUBMISSION DATE
		S.A.							
		luis CASTAÑON <export@stagi.com>	VAT: ESA80331192 EORI: ESA80331192	Spain (ES)	- Imp/prod/exp of HFCs in bulk - Producer or "Release for free circulation" importer	Undertaking			10/10/2014
Valid	9405	ALDIFRIO-Sociedade de Equipamentos de Frio e Ar Condicionado, Lda (PT) JOAQUIM ALDINHAS <aldifrio@mail.telepac.pt>	VAT: PT501298398 EORI: PT501298398	Portugal (PT)	- Imp/prod/exp of HFCs in bulk - Producer or "Release for free circulation" importer - Exporter	Undertaking			10/10/2014
Valid	9424	Lindab Sp. z o.o. (PL) Grzegorz Pieklik <grzegorz.pieklik@lindab.com> Sławomir MIELAŃCZUK <ekoslaw@gmail.com>	VAT: PL8520400158 EORI: PL852040015800000	Poland (PL)	- Imp/prod/exp of HFCs in bulk - Producer or "Release for free circulation" importer - Importer of equipment having HFCs - RAC (Refrigeration, AC, heat pump or MDI)	Undertaking			10/10/2014

F-gas portal

CSW EVENTS FOR

FILTERS

YEAR: 2025 | TARIC DOCUMENT TYPE CODE: | MRN: | RELOAD

F-gas
portal

QUANTITY MANAGEMENT SUMMARY | QUANTITY MANAGEMENT DETAILS | **CSW EVENTS**

CREATION DATE	EVENT DATE	EVENT	TYPE	MRN	REFERENCE NUMBER	TARIC CODE	ITEM	CNCODE	ITEM NUMBER	NET MASS	AMOUNT	SUPPLEMENTARY AMOUNT	TONNES OF CO2 EQUIVALENT	CUSTOMS PROCEDURE
2025-07-23 12:07:19	2025-07-23 14:07:18	CLEARANCE	GOODS_RELEASED	25CZ2000001JVUTNQ5	CZ221050	Y125								
2025-07-23 12:07:19	2025-07-23 14:07:18	CLEARANCE	GOODS_RELEASED	25CZ2000001JVUTNQ5	CZ221050	Y123								
2025-07-23 11:59:27	2025-07-23 13:59:23	RESERVATION		25CZ2000001JVUTNQ5	CZ221050	Y125								
								2903420000	1	7920	5346 TCE		5346	40
2025-07-23 11:59:26	2025-07-23 13:59:23	RESERVATION		25CZ2000001JVUTNQ5	CZ221050	Y123								
								2903420000	1	7920	5346 TCE		5346	40
								2903510010	2	1540	6.16 TCE		6.16	40

Trade

Trade controls

art. 23

- **Release for free circulation:** undertaking holding a quota or authorization to use it and registered on the F-gas portal = importer listed in the customs declaration
- **Other purpose:** Undertaking registered on the F-gas portal = declarant listed in the customs declaration who holds a permit for a special regime other than transit
- **Transit regime:** Undertaking registered on the F-gas portal = regime holder
- **Export:** Undertaking registered on the F-gas portal = exporter listed in the customs declaration



→ **Release for free circulation, import/export**

- **Information provided to customs authorities (import/export):**

- Identification number on the F-gas portal
- EORI (Economic Operators Registration and Identification number)
- Net weight of F-gases
- Commodity code (Combined Nomenclature, TARIC)
- F-gas content expressed in tons of CO₂ equivalent

Information about
EORI - CZ Customs
website

https://ec.europa.eu/taxation_customs/dds2/taric/taric_consultation.jsp?Lang=cs#

Trade

Trade controls/ illegal trade monitoring

art. 24

• Customs controls:

- Quota/Q authorization use BEFORE releasing goods into free circulation
- Registration of importer/declarant/exporter on the F-gas portal
- Refillable containers (HFC substances and Annex II substances, e.g. HFO) – declaration of conformity, including documentation on measures for returning containers for refilling (Article 11(4))
- Documentation on the disposal or recovery and further use of HFC 23 generated as a by-product of the production of other F-gases (Article 4(6))
- Declaration of conformity when placing products and equipment containing F-gases on the market (Article 19(2))
- Verification of compliance with import and export rules, likelihood of illicit trade, and past compliance by the company
- Control:
 - goods + description in the license and customs declaration
 - prohibition according to Annex IV and single-use bottles
 - Marking according to Article 12



Trade

Trade controls/ illegal trade monitoring

Art. 24

- **Customs authorities:**
 - Preventing attempts to import/export F-gases and products and equipment containing them that are covered by the F-gas Regulation
- **Illegal disposable vessels (including refillable vessels without the necessary documentation)** → confiscation or removal for disposal (customs authorities or market surveillance authorities)
- **F-gases in non-compliance with quotas and quota authorizations** → possibility of introducing auctions
- **Prohibition on the export of F-gases (Annex I, Section 1) whose release into free circulation is in non-compliance with the Regulation**



THANK YOU



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