



## Prior Annual Notification for the collection and transport of waste, returned and recovered refrigerants/halons/F-gases

(October 2022)

- Are you a contractor in the refrigeration, air conditioning, heat pump and fire suppressant sectors?
- Do you carry out servicing and maintenance of equipment that may have CFCs\*, HCFCs\* or HFCs\*\*?
- During servicing and maintenance, do you recover old refrigerants/halons/F-gases that need to be disposed of?

If so, you must comply with waste law for the collection of waste, returned or recovered refrigerants/halons/F-gases.

**WHY?** Most refrigerants/halons/F-gases are either *ozone depleting substances* or *fluorinated greenhouse gases*. When waste, they are considered hazardous. This means that the collection and transport of these waste gases can only be carried on by a contractor that has authorisation under waste legislation to do so in order to ensure environmental protection. Authorisation can be either

- A **Prior Annual Notification (PAN)** which has been submitted to and acknowledged by the Environmental Protection Agency, or
- A valid Waste Collection Permit issued by a Local Authority or National Waste Collection Permit Office (NWCPO).

**HOW?** A Prior Annual Notification can be submitted to the Environmental Protection Agency by any person intending to collect and transport waste, returned or recovered refrigerants/halons/F-gases in gas recovery containers. There is **no fee** for submitting a PAN. However, PAN's can only be submitted and acknowledged where the following conditions are met:

- such transport is incidental to your main business activity
- the quantity of waste, returned or recovered gases transported does not exceed 2 tonnes
- no mixing of different gases occurs
- the material is brought to an authorised facility\*\*\*
- no venting or leakage occurs
- the waste will eventually be recycled, reclaimed or destroyed at an authorised facility in accordance with the relevant legislative requirements for the specific gas type.

### How to complete a Prior Annual Notification:

- **Step 1:** Register as a User on [www.edenireland.ie](http://www.edenireland.ie) (this is a once-off exercise). Refer to [PAN Guidance Manual Part 1 for First Time Users \(V1, EPA 2015\)](#)
- **Step 2:** Access the ODS & F-gas Compliance System on [www.edenireland.ie](http://www.edenireland.ie) and submit a PAN online. Refer to [PAN Guidance Manual Part 2 Step-by-Step \(V1, EPA 2015\)](#)

A register of PANs received and acknowledged by the EPA is available on the EPA website at [Waste ODS & F-gases: Prior Annual Notifications](#) .

**WHAT IF? Failure to comply may result in prosecution.** The EPA is responsible for enforcing this requirement. Enforcement inspections and other enforcement measures will be carried out.

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\*CFCs (e.g. R 11, R12) and HCFCs (e.g. R22) are ozone depleting substances and are controlled by Regulation (EC) No. 1005/2009 and the Control of Substances that Deplete the Ozone Layer Regulations 2011 (S.I. No. 465 of 2011)

\*\* HFCs (e.g. R410 a, R134a, R404a, etc.) are fluorinated greenhouse gases and are controlled by Regulation (EC) No. 517/2014 and the EU (Fluorinated Greenhouse Gas) Regulations 2016 (S.I. No. 658 of 2011).

\*\*\* An authorised facility is a facility that has been granted an environmental authorisation through the Waste Management Act 1996 (as amended) in the form of a waste licence, a waste facility permit or a certificate of registration.

\*\*\*\* Waste Management (Collection Permit) Regulations, 2007 (S.I. No. 820 of 2007, amended by S.I. No. 87 of 2008).